

VOLUME I – APPENDIX AA

Ministry of Climate Change, Environment and Energy Republic of Maldives

ASSURE PROJECT Design Supply and Installation of Microgrid Modifications and Expansions for Integration of Solar Photovoltaic Systems in 20 Islands across Maldives

Environmental Management Plan

The environmental management plan includes the implementation arrangements, mitigation measures and monitoring requirements given in Chapter VII, Appendix 16 and Appendix 17 (given below) of the Initial Environmental Examination (IEE) for the ASSURE project and also available at <https://www.adb.org/projects/documents/mld-55191-001-iee>.

This EMP will form part of the contract document together with General Environment, Health & Safety (EHS) Conditions of Contract (CoC) for all contractors.

This EMP will form the basis for the contractor to prepare their environmental, health and safety management plan.

VII. ENVIRONMENTAL MANAGEMENT PLAN

A. Introduction

313. ADB's Safeguard Policy Statement (2009) requires that an environmental management plan (EMP) be prepared and implemented for a category B environment project. The EMP is the synthesis of all the mitigation measures to avoid, minimize, mitigate, or compensate/offset for the adverse environmental impacts and risks on the physical, biological, and socioeconomic environment that have been identified in the previous sections of the IEE as well as to enhance positive impacts. It aims to ensure compliance with (i) ADB's Safeguard Policy Statement 2009 requirements and international good practice as set out in the related International Finance Corporation (IFC) Environment, Health and Safety (EHS) general, Electric Power Transmission and Distribution and Wind Energy guidelines, and (ii) applicable environmental, health and safety requirements of the Government of Maldives, including the international agreements which it is a signatory too, as well as the sensitivity of local ecological and human receptors in the project area of influence.

314. The EMP outlines the mitigation measures to be implemented set to a timeframe, and the responsibilities for implementing them, whilst a monitoring plan elaborates on the monitoring requirements and responsibilities. To ensure these mitigation and monitoring plans are implemented, MOECCT and their Project Management Unit (PMU) supported by a Project Management Consultant (PMC) will need to undertake a program of environmental supervision and monitoring during project implementation. The institutional arrangements for this are also set out. The definitive version of the EMP cleared by ADB is the version disclosed on its website. The EMP is dynamic and can be updated as appropriate during the project implementation. However, any update to the EMP will first need to be cleared by ADB. In addition, any unanticipated impacts including changes to the project design and layouts as assessed in the IEE, or requirements for corrective action due to non-compliance identified during project implementation will be reported to ADB. In this case appropriate action will be agreed and taken by MOECCT and their contractors and FENAKA/Island Councils once operational to address them and bring the project implementation back on track.

315. The major components of the EMP are:

- (i) Corrective action plan for existing facilities (powerhouses) to be implemented by FENAKA pre-construction;
- (ii) Mitigation plan including performance standards to be followed by concerned parties during preconstruction, construction, operation and decommissioning of the project components;
- (iii) Monitoring plan including performance standards for quantitative monitoring to be undertaken; and
- (iv) Institutional arrangements, including organizational roles and responsibilities for mitigation, supervision, monitoring and reporting on EMP implementation, capacity development and training requirements for MOECCT, the PMU, their contractors, and FENAKA/Island Councils on various aspects of EMP implementation and, an indicative cost estimates/budget for its implementation.
- (v) Grievance redress mechanism (GRM)—Chapter F of the IEE report sets out the GRM for the project with roles and responsibilities for MOECCT, the PMU, their contractors, and FENAKA/Island Councils.

316. The EMP will form part of all bidding and contract documents and during planning and detailed design (pre-construction) and construction the contractors will be responsible for implementing all relevant measures under the supervision of the MOECCT. Any updates to it will be incorporated into the contract document. The contractors must always follow the definite version of the EMP which is the version that is disclosed on ADB's website. Contractors will cover the costs where corrective action is required due to non-compliance on behalf of the contractors, their subcontractors or third parties with the EMP.

317. There are five EPC contract packages to be awarded for the (i) lithium-ion BESS, (ii) flow BESS, (iii) ocean energy pilot, (iv) wind energy pilot, and (v) ground mounted solar on Thoddoo island. There are also two works contract packages for (i) grid upgrades and (ii) rooftop solar, under which there may be 3–4 lots each. For these the equipment will be separately procured under two goods contracts. Both the EPC and works contracts must append a full copy of the EMP including both the general and site-specific mitigation and monitoring plans relevant to the contract. For goods contracts MOECCT PMU will need to ensure relevant EMP measures including prohibitions on PCBs, asbestos containing materials, and SF6 are reflected in the equipment specifications.

B. Existing Facilities Corrective Action Plan

318. Since the project involves existing facilities that have been subject to environmental audit it is necessary for corrective action to be undertaken. Appendix 7 contains the corrective action plan for existing facilities (powerhouses); unless otherwise indicated, all actions are to be completed by FENAKA or delegated to the contractors through the scope of the relevant contracts prior to the contractor being given access to the project sites.

319. MOECCT PMU will be responsible to submit a report on the status of the corrective actions undertaken by FENAKA or delegated to ADB for clearance prior to the contractor being given access to the powerhouses in question to undertake works including site establishment. Contractors will be responsible for implementing any corrective actions delegated to them, or otherwise outstanding on gaining access to the powerhouses in addition to the requirements of the mitigation plan.

C. Mitigation Plan

320. The mitigation hierarchy; avoid, minimize, mitigate, offset/compensate; has been used to guide the mitigation of environmental and social impacts from the project components. Careful site selection and project design at the planning and detailed design stage can avoid significant impact. This is especially so since the ocean energy pilot is to be sited in the marine environment in a location that is still to be confirmed, and since the wind energy pilot can have noise, shadow flicker and safety impacts if it is not designed to meet performance standards in line with the IFC EHS Guidelines on Wind Energy. The environment, health and safety parameters to be followed for the ocean energy and wind energy pilots are set out in the mitigation plan and will need to be taken on board by the contractor, MOECCT PMU with the support of the PMC must ensure the performance standards are adhered to before approving any detailed design. The rest of the proposed mitigation strategy focuses on minimizing the minor to moderate impacts of the project components. In addition to the impacts of the ocean and wind energy systems mentioned above the main anticipated impacts and risks of the project-funded components relate to short-term (approximately 3-5 days for smaller works and up to two months for larger works i.e. wind turbine installation) disruption and disturbance during construction; pollution risks; and health and safety

risks to workers and local communities, for example, island roads will be blocked and noise and dust emissions will be created from the operation of construction machinery such as concrete mixers, bulldozers, dump trucks, cranes etc.

321. A general mitigation plan showing the stage-wise potential impacts and proposed mitigation measures and responsible party has been prepared in a matrix form and presented in Table 1, Appendix 16. Considering there are several project components which involve construction work, this common matrix will be applicable for all the components involving construction activities and will be attached to all EPC and works contracts. Operational phase mitigation measures are primarily for FENAKA, except for the ocean energy and wind energy pilots where the contractor will continue to be responsible for operation during and decommissioning at the end of the pilot, and the agricultural interventions which will be handed over to the Island Councils. All maintenance works during the operation phase, including by the contractors during their defect liability period and any operation and maintenance obligations will be undertaken following the construction measures. Separate matrices have been prepared for the individual components addressing component-specific impacts and mitigation of a particular component as follows:

- (i) General mitigation plan matrix for all construction work (Table 1, Appendix 16) including environmental codes of practice (Appendix 17),
- (ii) Mitigation plan matrix for BESS, EMS and Grid Upgrades (Table 2, Appendix 16),
- (iii) Mitigation plan matrix for solar photovoltaic plants (rooftop and ground mounted) (Table 3, Appendix 16),
- (iv) Mitigation plan matrix for Wind Energy Pilot (Table 4, Appendix 16),
- (v) Mitigation plan matrix for Ocean Energy Pilot (Table 5, Appendix 16) which is to be updated for ADB clearance following confirmation of the selected island, and
- (vi) Mitigation plan matrix for agricultural intervention (Table 6, Appendix 16) which is to be updated for ADB clearance following confirmation of the scope of physical interventions.

322. These mitigation plan matrixes for the ocean energy pilot and agricultural intervention will be updated as part of updating the IEE following the feasibility studies since the locations and exact scope are still be studied, the updated EMP will be cleared by ADB before the feasibility study is approved by MOECCT.

D. Monitoring and Reporting

The extent of monitoring and reporting must be commensurate with the project's impacts and risks. Throughout implementation of the project, MOECCT, and FENAKA/Island Councils during operation, will need to supervise and monitor EMP implementation progress and the impacts of the project in the field, the performance standard being all EMP mitigation and monitoring measures are implemented in full at the appropriate time. The environmental monitoring plan (EMOP) (Table 7, Appendix 16) sets out the minimum provisions for quantitative environmental monitoring and performance standards to be achieved—scope and periodicity is commensurate with the project's impacts and risks. Monitoring activities including any laboratory analysis for air quality, noise and water quality are to be carried out by a suitably qualified and experienced third-party monitoring organization that is approved by the EPA. Quantitative monitoring activities may be modified during project implementation, depending on the contractors' performance and analytical results obtained. If performance is worse than expected, corrective action will be identified, and environmental monitoring activities adjusted accordingly by MOECCT and their contractors if during pre-construction and construction and FENAKA/Island Councils once

operational, to help resolve any unsatisfactory performance. MOECCT will establish a system for supervision and monitoring and preparing semi-annual environmental monitoring reports for submission to ADB and local disclosure with inputs from FENAKA/Island Councils during operation.

E. Implementation Arrangement

The main institutions that will be involved in environmental management activities are the Ministry of Finance as the executing agency (EA); and MOECCT as implementing agency (IA) of the project, project management consultant (PMC), EPC and works contractors, and line agencies including the Environment Protection Agency (EPA). The project management unit (PMU) will be established under MOECCT for implementing the project facilities. MOECCT will be responsible for implementation, supervision and monitoring of the project with the support of FENAKA and the Island Councils.

323. MOECCT PMU will coordinate with EPA to seek advice on regulatory requirements for the project. If required MOECCT with support from PMC environment experts will update this IEE and EMP to meet the EPA requirements to get necessary approvals as per national requirements.

324. Efficient project implementation related to the EPC, works and goods contracts will be provided by the PMC and will include preparation of bidding documents; assistance during the bidding process and evaluation; and supervision of the technical design, equipment supply, construction, and commissioning as well as piloting and decommissioning in respect of the ocean and wind energy.

325. The EA/IA have overall responsibility for all aspects of the project. The IA through the PMU with support of the PMC will be responsible for day-to-day management of technical aspects of the project. The PMU will be responsible for updating the IEE and EMP as well as approving contractors' feasibility studies, detailed designs, and construction related management plans, and to ensure on-ground implementation by the contractors of the EMP. The EA/IA will ensure the environmental management and monitoring budgets are available and utilized as necessary for timely implementation of the EMP and CAP for existing facilities by all government entities.

326. The existing capacity of MOECCT in managing project level environmental aspects needs strengthening to ensure compliance with ADB and government requirements. PMU will have an environment officer and social (community liaison) officer in the project organization structure who will be full-time and primarily responsible for ensuring that the EMP and CAP for existing facilities is properly implemented. PMC will provide training and capacity building to PMU staff on managing the environmental issues associated with project and be responsible for ensuring the quality of deliverables before submission to ADB. Costs for the appointment of PMU officers and for the PMC consultant support are included in the capacity building component of the Project.

327. The contractors will be informed of their responsibility to comply with the EMP and the requirements of ADB. There are specific responsibilities for EMP compliance during construction phase that will rest with the contractors who will be supervised and monitored by the safeguards team of PMU and PMC. The contractors will be required to have one staff with experience in environmental management and one staff with experience of health and safety to supervise and monitor day-to-day EMP implementation and be responsible for preparing plans such as the CEMP, CHSMP, etc.

1. Institutional Arrangement

328. MOECCT will have ultimate responsibility for implementing the provisions of the EMP with the main parties involved in environmental management and monitoring activities for this project being:

- (i) **Ministry of Finance** as the executing agency to provide guidance to MOECCT on all project related matters.
- (ii) **Ministry of Environment, Climate Change and Technology** as the implementing agency responsible for environmental, health and safety management and compliance with the government regulatory requirements, ADB's Safeguard Policy Statement 2009, the project's loan covenants and EMP requirements ultimately lies with the MOECCT management.
- (iii) **Project management unit.** Responsible for the overall day-to-day management of the technical, environmental, and social aspects of project implementation and thus compliance with the government regulatory requirements, ADB's Safeguard Policy Statement 2009, the project's loan covenants and EMP requirements. The PMU will include an Environmental Officer and Social (Community Liaison) Officer who will be responsible for advising the technical arm of the PMU on EMP implementation requirements, supervising and monitoring EMP implementation including on-site supervision, acting as a GRM Focal, and preparing the semi-annual EMRs for submission to ADB.
- (iv) **Project management consultants).** Consulting firm to support PMU in overseeing project implementation, including and international environment consultants and national environment and terrestrial/marine ecological consultants to support PMU with updating of the IEE, providing regular (monthly) on-site supervision during the construction period, and undertaking ecological field survey work.
- (v) **International marine ecology expert.** To provide environment safeguards capacity development support, this expert will be separately appointed under TA6603.
- (vi) **Contractors and their subcontractors (if any).** Through the contract, MOECCT will delegate responsibility for implementing all relevant EMP measures to their contractors. The contractors are to employ suitably qualified and experienced full-time environment and social officers and health and safety officers as their safeguards team with a dedicated EHS supervisor on each island and health and safety steward on each active construction site where there are multiple islands/sites involved. For the wind pilot and ocean pilot ecologists will also be employed.
- (vii) **Construction workers employed formally or informally by the contractors and their subcontractors.** These workers will need to abide, in their behavior and work, to directives issued by their employer with regards to environmental, health and safety management.
- (viii) **FENAKA.** Responsible for implementation of the CAP and operation of the BESS, grid upgrades, rooftop and ground mounted solar upon handover from the contractors.
- (ix) **Island councils.** Responsible for providing and enforcing island-levels permissions as well as operation of the agricultural intervention upon handover.
- (x) **Environment protection agency.** Responsible for providing and enforcing all national environmental clearances required.
- (xi) **Project financiers–ADB.**

329. Key roles and responsibilities with respect to EMP implementation, supervision, monitoring and reporting are discussed in more detail below with the implementation arrangements illustrated in Figure 42. Reporting, instructions, liaison/consultation, and advice/inspection channels are also shown.

2. Ministry of Environment, Climate Change and Technology and Project Management Consultants Roles and Responsibilities

330. MOECCT will be the implementing agency and their management will establish a new PMU to be responsible for day-to-day management of project implementation including EMP implementation, supervision, and monitoring of their contractors' performance as well as establishment of the GRM and resolution of any grievances received. MOECCT will delegate relevant detailed design, pre-construction, and construction measures to its contractors through the contract. It will also put in place the institutional arrangements to ensure private sector developers will follow the Safeguard Policy Statement (2009) requirements (not just the government regulatory requirements) in developing associated facilities of the project. However, MOECCT will have ultimate responsibility for ensuring the provisions of the EMP are implemented by all parties concerned.

331. During project implementation, MOECCT/PMU is responsible for the following activities (not an exclusive list):

- (i) Ensuring adequate budget, institutional/management support, and staff resources are allocated to implement, supervise, and monitor the EMP throughout the project.
- (ii) Upon loan effectiveness appointing a suitably qualified and experienced, named environment officer and social (community liaison) officer and providing them with adequate resources and facilities to support MOECCT/PMU with EMP implementation.
- (iii) Providing with the support of PMC and the international marine ecology expert a suite of training activities for PMU staff, contractors, and EPA in relation awareness raising on Safeguard Policy Statement (2009) requirements and EMP implementation.
- (iv) Ensuring that all PMU staff support and attend all capacity development and training activities provided, and to facilitate the provision of the training venues etc.
- (v) Adopt a zero-tolerance approach to OHS on the project, enforce all PMU staff to comply with the OHS requirements of the EMP including the wearing of appropriate PPE on the construction site to set a good example to the contractor and their workers.
- (vi) Securing national environmental clearances before contract award and complying with any requirements set.
- (vii) Implementing the EMP and supervising and monitoring implementation by the contractor during all relevant stages of project implementation.
- (viii) Incorporating the EMP into the bidding and contract documents before issuing tenders and contract awards. The contract will explicitly require the contractors to provide an environment safeguards team to support EMP implementation, to report at least monthly to the PMU on their EMP implementation and immediately report any unanticipated impacts including health and safety incidents and chance finds.
- (ix) Reviewing bids to ensure they are in accordance with the EMP requirements prior to contract award.

- (x) Reviewing and approving in a timely manner contractors' detailed designs as well as any additional environmental safeguard assessments and their CEMP and CHSMP and sub-plans to ensure they incorporate and are in accordance with the EMP requirements.
- (xi) Updating the IEE/EMP as required in consultation with ADB prior to approval of the feasibility studies and detailed designs to reflect any changes from the scope and design assessed by the IEE and obtaining ADB's clearance for the update prior to commencement of any work, including site establishment. Once cleared, ADB will disclose the updated IEE on its website whilst PMU will locally disclose it.
- (xii) Preparing a community liaison/consultation plan and training plan to elaborate on EMP implementation.
- (xiii) Developing with the support of PMC international environment expert formal systems and templates for the PMU environment officer, the contractors, and national PMC consultants to supervise, monitor and report on day-to-day implementation of all aspects of EMP implementation, including the immediate reporting of non-compliances, unanticipated impacts, accidents, and chance finds etc.
- (xiv) Undertaking on-site supervision with all active construction sites (excluding rooftop solar sites) being physically visited by the PMU environment officer at least once per month to determine the status of EMP implementation by the contractors – FENAKA supervision staff will also assist PMU with day to day monitoring of EMP implementation.
- (xv) Keeping daily records and photo logs of site observations to inform preparation of the semi-annual EMRs.
- (xvi) With the support of PMC conduct monthly EHS meetings with each contractor's management including physical "spot check" site visits to at least one of their active construction sites (including rooftop solar sites) and the ocean and wind energy pilot projects during their first year of O&M to audit EMP implementation.
- (xvii) Identifying areas for improvement, unsafe acts, and any non-compliance with the EMP by the contractor and instructing corrective action to be taken by them to bring implementation back on track.
- (xviii) Ensuring that prior to handover from the contractors the project components as constructed will enable FENAKA and the Island Councils to comply with their O&M actions; undertaking site visits to check their EMP compliance during O&M stage.
- (xix) With the support of PMC developing O&M SOPs reflecting O&M-related environment, health and safety measures to be adopted and followed by FENAKA site operations management teams upon handover to them. For the powerhouses (grid upgrades) SOPs will include safe handling, storage, and disposal of diesel fuel, oil residues, and lubricating oil associated with existing diesel generators.
- (xx) Thoroughly investigating all unanticipated impacts, near-misses, accidents, and chance finds; preparing a detailed incident report where applicable, identifying and instructing corrective action particularly to avoid any repetition of near-misses and accidents.
- (xxi) Monitoring and reporting on EMP implementation including the submission of semi-annual EMRs to ADB from loan effectiveness and at least the first year of operation up until the ADB project completion report (usually 1-2 years after financial close) or longer period if required due to outstanding environmental issues.
- (xxii) Undertaking ongoing consultation with island councils and local communities to inform them of progress with project implementation including prior to finalization

of detailed designs, giving attention to consultations with women and other vulnerable groups. All ongoing consultation, such as, minutes of the meetings will be documented in the EMRs submitted to ADB.

- (xxiii) Upon loan effectiveness establishing and operationalizing the GRM for affected persons (construction workers and local community members) in line with provisions of the IEE report, including establishing a grievance redress committee for affected persons, recording and promptly addressing all environmental and social grievances received. Contact details for the GRM will be prominently displayed on notice boards at the project site. All ongoing grievance-related information will be documented in the EMRs submitted to ADB. Further details on the GRM are provided in Section 6.
- (xxiv) Locally disclosing the IEE and other environmental safeguards documentation. This will include MOECCT website publication and ensuring full copies of the IEE report and its executive summary translated into Dhivehi are available at the island council, powerhouse and construction site offices. Notices will also be placed on noticeboards at the project site and offices informing of the main findings of the IEE and the availability of the IEE report with notice given that help with translation into affected persons' languages or an explanation of their content will be extended free of charge on request.
- (xxv) Reporting any unanticipated impacts, incidents, and chance finds to ADB within 48 hours of them occurring along with a corrective action plan.
- (xxvi) Updating the IEE/EMP as necessary and locally disclosing any updates if unanticipated impacts (including project scope or design changes) occur during implementation; any such updates must be submitted to ADB for clearance and disclosed on the ADB website before any related works commence or are cleared to continue.
- (xxvii) Upon any decommissioning including of the ocean energy pilot and wind energy pilot if not successful, ensure construction-related measures in relation to the dismantling of equipment and restoration of the sites and other specific activities like transport and disposal of used batteries, photovoltaic panels, and electrical equipment are being followed.
- (xxviii) Developing and taking all requisite corrective action in case of any non-compliance with the EMP during pre-construction and construction, including repair of any property damage and financial compensation (insurance) for any health and safety incidents.

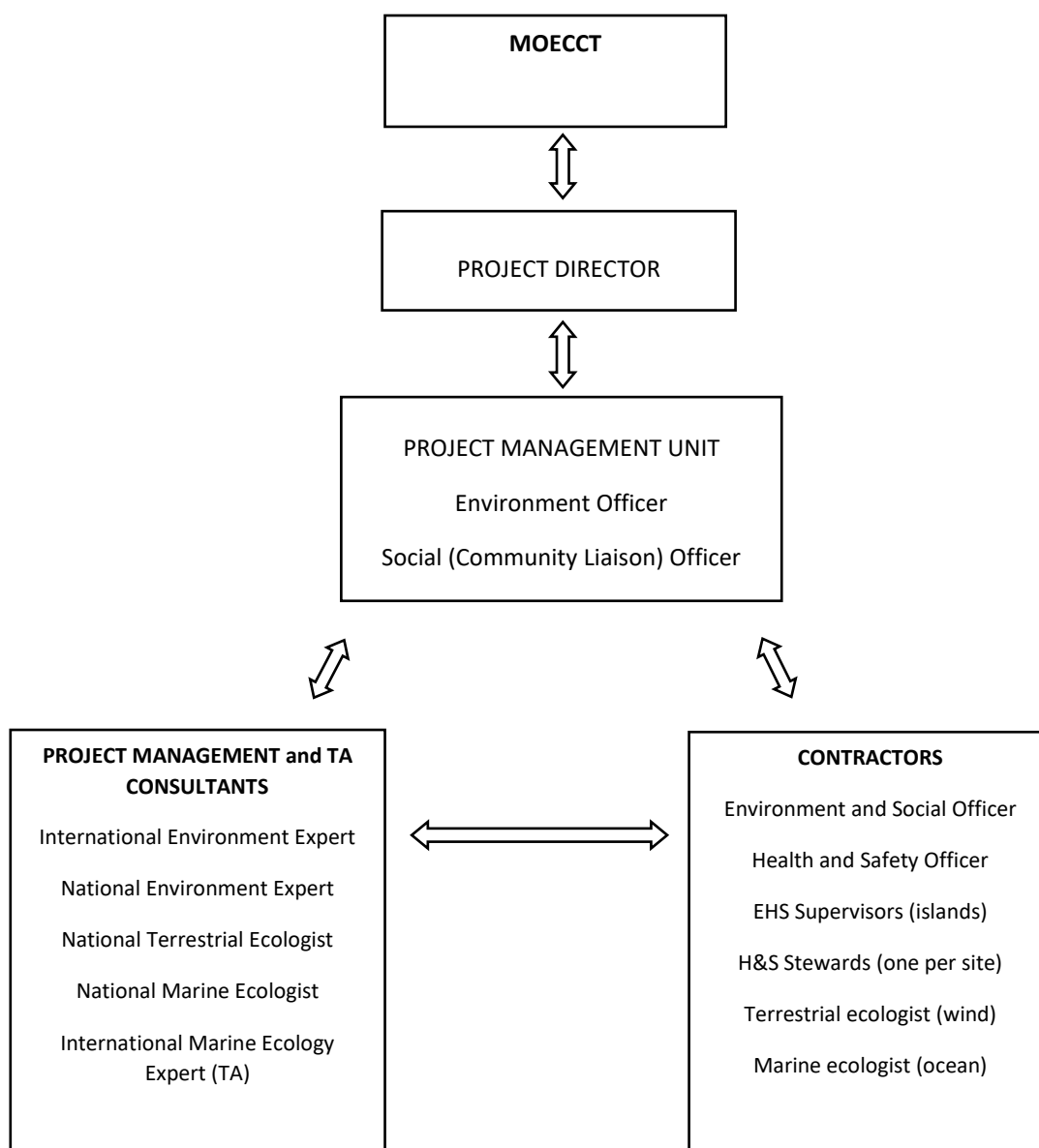
3. Project Management Consultant Roles and Responsibilities

332. The PMC will be comprised of individuals or a firm including international and national environment consultants and national terrestrial and marine ecological consultants. There will be a separate international marine ecology consultant employed under ADB TA. These consultants will support MOECCT/PMU by undertaking the following activities (not an exclusive list):

- (i) Support delivery of safeguard training and capacity building activities and provide on-the-job guidance to PMU and contractors ensuring compliance with the EMP requirements.
- (ii) Supporting PMU to obtain national environmental clearances before contract award.
- (iii) Supporting PMU to incorporate the EMP into the bidding and contract documents before issuing tenders and contract awards.

- (iv) Supporting PMU in reviewing bids to ensure they are in accordance with the EMP requirements prior to contract award.
- (v) Supporting PMU in reviewing contractors' detailed designs as well as any additional environmental safeguard assessments and their CEMP and CHSMP and sub-plans.
- (vi) Leading on updating the IEE/EMP as required in consultation with ADB prior to approval of the feasibility studies and detailed designs to reflect any changes from the scope and design assessed by the IEE.
- (vii) Helping to prepare the community liaison/consultation plan and training plan to elaborate on EMP implementation.
- (viii) Developing the formal systems and templates for supervision and monitoring to ensure that contractors adhere to all the provisions in the EMP as well as their CEMPs, CHSMPs, and sub-plans as approved by the PMU.
- (ix) Organizing and conducting monthly EHS meetings with each contractor's management including physical "spot check" site visits to at least one of their active construction sites (including rooftop solar sites) to audit the EMP implementation.
- (x) Keeping records and photo logs of site observations to inform preparation of the semi-annual EMRs.
- (xi) Helping to develop O&M SOPs reflecting O&M-related environment, health and safety measures to be adopted and followed by FENAKA site operations management teams upon handover to them.
- (xii) Helping to prepare the EMRs for submission to ADB.
- (xiii) Reporting on any grievances or violations of the EMP and assisting in implementing solutions and remedial measures.
- (xiv) Supporting PMU to undertake ongoing meaningful consultation with affected communities to keep them informed of progress and local disclosure of the findings of the IEE reports and EMRs etc.
- (xv) Supporting implementation of the GRM and assisting PMU to resolve on-going issues related to environmental and social safeguards during pre-construction and construction.

Figure 42: Institutional Arrangement for Environment Management Plan Implementation



Source: PAM

4. Contractor Roles and Responsibilities

333. The contractors will be required to comply with the EMP during all relevant phases, closely supervised and monitored by PMU supported by the PMC. The contractors will be delegated, through the contract, the requirement to undertake relevant mitigation and monitoring actions as set out in this EMP at the construction sites as well as at any overnight accommodation provided by them, and to assist with operation of the GRM. The contractors are required to ensure that the EMP requirements are cascaded down to all subcontractors undertaking works relating to the project, regardless they are formally or informally employed. The construction contractors will have a corporate EHS policy and environmental management certifications preferably such as ISO 14001 (or equivalent) and EHS certification such as ISO 45001 or equivalent.

334. The contractors are to employ the following suitably qualified and experienced officers as their safeguards team:

- (i) at least one dedicated environment and social officer with an environmental management bachelor's degree or similar qualification to be based full-time on-site for the duration of works under the contract package, to monitor and supervise the contractor's EMP implementation on a day-to-day basis reporting to their management and ensure quantitative monitoring as per the EMOP requirements,
- (ii) at least one dedicated health and safety officer with NEBOSH/IOSH certification or similar qualification to be based full-time on-site for the duration of works under the contract package, to monitor and supervise the health and safety aspects of the contractor's EMP implementation on a day-to-day basis reporting to their management and ensure quantitative monitoring as per the EMOP requirements.
- (iii) For the wind pilot and ocean pilot, a terrestrial or marine ecologist respectively to implement the EMP requirements and support the environment and social officer in undertaking ecological quantitative monitoring as per the EMOP requirements.

335. Further, each island and active construction site is to have adequate health and safety supervision to ensure the health and safety of all workers and local communities; the health and safety officer will be supported by full-time on-site EHS supervisors with at least one supervisor per island, and full-time on-site Health and Safety stewards with at least one steward at each active construction site.

336. The safeguards team of the contractors will be responsible for reporting environmental safeguards progress and performance at least monthly to the PMU including recording all data required by the EMOP and providing necessary inputs to the quarterly progress reports and semi-annual EMRs for the duration of their contract. The contractor's safeguards team will also act as the GRM Focals for each contract package/lot to keep affected persons informed of works and be available to receive and deal with any grievances from workers and the local community at the project site level.

337. During project implementation, the contractors are responsible for the following activities (not an exclusive list):

- (i) Implementing all actions and responsibilities allocated to the contractors under the EMP for the full duration of the contractor's involvement in the project.
- (ii) Ensuring adherence to all applicable national environment, health, safety, and labor laws and regulations in force at the time.
- (iii) Ensuring adherence to ADB's Safeguard Policy Statement (2009) and the related IFC Environment, Health and Safety (EHS) guidelines.

- (iv) Ensuring the feasibility studies and detailed designs reflect the EMP requirements; seeking to ensure the same or no worse impact than the design assessed in the IEE.
- (v) Supporting PMU to update (as required) the IEE in respect of the feasibility studies and detailed design by undertaking further assessment as required by the EMP and providing sufficient details to inform a revised project description and any subsequent reassessment of impacts.
- (vi) Ensuring adequate budget and staff resources are allocated to comply with and implement the contractor's responsibilities under the EMP and to supervise and monitor the active construction site to protect the environment and ensure the health and safety of all workers and affected communities.
- (vii) Ensuring a suitably qualified and experienced safeguards team has been appointed to undertake regular on-site supervision and monitoring activities before the commencement of works.
- (viii) Undertaking and documenting a facilitated health and safety risk assessment considering all stages of the project, not just those stages the contractor is responsible for, and including consideration of COVID-19 risks amongst others.
- (ix) Preparing a Construction Environment Management Plan (CEMP) and a Construction Health and Safety Management Plan (CHSMP) both with sub-plans as specified in the EMP for review and approval by PMU prior to the commencement of works.
- (x) Ensuring that all construction workers including all formal and informal employees and subcontractors understand their responsibilities to implement the EMP and mitigate environmental impacts associated with pre-construction and construction activities.
- (xi) Providing and ensuring attendance at EHS training to formal and informal construction workers and other personnel as required.
- (xii) Adopting a zero-tolerance approach to OHS on the project, enforce all workers to comply with the OHS requirements of the EMP including the wearing of appropriate PPE on the construction site.
- (xiii) Supporting PMU in undertaking ongoing public consultations and implementing the site-level GRM; in particular, the contractor's GRM focals shall thoroughly document details of complaints and make its best efforts to resolve the complaints at project site level; all this information is to be included in the contractor's monthly reports to MOECCT.
- (xiv) Undertaking environmental monitoring as set out in the EMOP (Table 7, Appendix 16) during pre-construction and construction (as well as the O&M stage for the wind and ocean pilot projects) and documenting qualitative and quantitative monitoring results.
- (xv) Submitting monthly environmental management reports to PMU (these reports will be included as part of the contractor's monthly progress reports), relating the work undertaken over the reporting period and documenting the environmental measures including monitoring activities that have been carried out, problems encountered, record data including near misses and incidents, grievances received, and follow-up actions that were taken (or will be taken) to correct the problems.
- (xvi) Informing PMU immediately in case of any approved detailed design changes or unanticipated environmental impacts occurring during the project implementation stage, and as required, provide any information needed to the PMU to enable them

to promptly update the IEE/EMP for clearance by ADB before any changes are implemented.

- (xvii) Informing PMU within 24 hours in case of chance find or incident on site and providing within 48 hours an incident report with corrective action detailing how reoccurrence will be prevented.
- (xviii) Informing PMU immediately in case of any non-compliance and help them to prepare as necessary a corrective action plan for clearance by ADB, the contractor is required to implement all necessary corrective action requested by PMU to ensure the project remains in compliance with national regulatory requirements, ADB's Safeguard Policy Statement (2009), the project's loan covenants and EMP requirements.

338. For the O&M and decommissioning phases, any contractors hired for major maintenance works or decommissioning will also be supervised and monitored by MOECCT or FENAKA with their EMP roles and responsibilities the same as those of the contractors for construction.

F. Monitoring and Reporting Arrangements

339. An Environment Monitoring Report (EMR) (template included in Appendix 13) will be submitted to ADB on a semi-annual basis by the PMU with safeguards inputs provided to quarterly progress reports as per the PAM. Since no social safeguard impacts are anticipated, the environmental monitoring reporting will also reflect on any social impacts. Following loan effectiveness, semi-annual EMRs will be due for submission to ADB within 15 days of the month following period end, e.g., before mid-July and mid-January each year. The EMRs will describe project implementation progress, any scope or design changes, compliance against environment and social safeguard requirements that are covenanted in the legal agreements, progress with environment mitigation implementation, quantitative monitoring results in accordance with the EMOP, and details of grievances received. If any performance standards are breached or any of the safeguard requirements that are covenanted in the legal agreements are found not to be satisfactorily with complied by MOECCT or their contractors, an appropriate, time bound, budgeted, corrective action plan (CAP) will be developed and implemented as agreed upon with ADB to rectify unsatisfactory project performance or any safeguard noncompliance in a timely manner. EMRs, any CAP or updated IEE submitted to ADB during project implementation will first be reviewed by ADB for quality and acceptability and then once cleared by ADB disclosed locally (on the MOECCT website and in island council, powerhouse, and construction site offices) and on the ADB website upon receipt. PMU will carry out the following actions to supervise and monitor EMP implementation (not an exclusive list) and ensure intended environmental safeguard outcomes are being achieved by the ASSURE project:

- (i) Undertaking regular on-site supervision each month and keeping daily records and photo logs of site observations to inform preparation of the semi-annual EMRs—FENAKA supervision staff will also assist PMU with day-to-day monitoring of EMP implementation.
- (ii) Conducting monthly EHS meetings including “spot check” site visits to audit in more depth EMP implementation by the contractors and those responsible for O&M.
- (iii) Obtaining monthly reports from contractors and during O&M the FENAKA operational site management teams.
- (iv) Reviewing qualitative and quantitative monitoring results to identify any issues of concern.

- (v) Identifying areas for improvement, unsafe acts, and any non-compliances with the EMP and instructing corrective action to be taken by them to bring implementation back on track.
- (vi) Keeping records of all monthly reports, meetings, inspections and audits and time-bound corrective actions instructed.
- (vii) Supervising and monitoring the implementation of corrective actions alongside EMP implementation to ensure that these are implemented in a timely manner.

340. In addition to standard contract monitoring systems established by the PMU the PMC will develop formal systems and templates for monitoring and reporting on EMP implementation, with the following reporting lines. Those responsible shall ensure timely submissions of reports with an acceptable level of detail:

- (i) Contractors will establish their own internal systems for monitoring and reporting their EMP implementation.
- (ii) Contractors as the main executors of the EMP will formally submit monthly and quarterly environmental management reports per an agreed template to PMU who will share the report with the Environment Officer who in turn will share with PMC.
- (iii) Once works commence on site the PMU Environment Officer will keep written records and photo logs of their site observations reporting their findings at least weekly to the PMC who will prepare written monthly summaries of the EMP progress—these monthly summary reports will be attached to the EMRs submitted to ADB.
- (iv) Photographic records will be kept, covering all activities on site as well as key locations such as stores, sanitation and welfare facilities, overnight accommodation etc. Photographs for key areas will also be taken prior to beginning of construction activities, to provide the environmental baseline. Copies of all geo-referenced photographs will be retained centrally by the Environment Officer and PMC along with their site observation records and the written monthly summaries.
- (v) PMC to convene monthly EHS meetings to be attended by the PMU staff, PMC, and contractor's management and safeguard team to discuss EMP implementation progress; initially progress will be discussed in relation to detailed design actions and as the project progresses will move onto pre-construction and contraction actions etc.
- (vi) During the monthly EHS meetings areas for improvement, unsafe acts, and any non-compliances, time-bound corrective actions and responsibilities to address them will be discussed, agreed, and documented – minutes of monthly EHS meetings will be taken by the PMC and submitted to the Environment Officer to be attached to EMRs submitted to ADB.
- (vii) Environment Officer will be able to instruct other members of the PMU and be given delegated authority to instruct the contractors to take corrective action at any time in relation to EMP implementation.
- (viii) Environment Officer will maintain the time-bound corrective action plan, monitoring and reporting of corrective actions will be undertaken alongside monitoring and reporting of EMP implementation.

341. The Environment Officer will be responsible for obtaining and centrally maintaining documentation, and that document control is ensured through access by and distribution to relevant personnel. Documentation and records to be kept by all parties in hard copy as well as electronic format are as follows (not an exclusive list):

- (i) Definitive IEE and EMP (as disclosed on the ADB website)
- (ii) National environmental clearance documentation
- (iii) Tree felling permits, etc.
- (iv) Community liaison/consultation plan and records of all consultations undertaken
- (v) Training plan and training records
- (vi) Records of emergency preparedness and response drills
- (vii) Document review and approval records
- (viii) CEMP, CHSMP and their subplans
- (ix) Contractor's certifications and insurances
- (x) Completed site checklists and photographic records
- (xi) Corrective action instructions
- (xii) Contractor's records and incident reports
- (xiii) GRM records

342. MOECCT and those with O&M responsibilities will facilitate ADB—or any third party selected on behalf of ADB—to carry out the following monitoring actions to supervise project implementation:

- (i) Conduct periodic site visits during the project implementation to confirm compliance with ADB's Safeguard Policy Statement 2009, the project's loan covenants and EMP requirements.
- (ii) If required, conduct supervision missions with detailed review by ADB's safeguard specialists/officers or consultants.
- (iii) Review and comment on the periodic EMRs to ensure that adverse impacts and risks of the project are mitigated as was planned and agreed with ADB, that any corrective actions have been duly implemented, and that the GRM is fully functional.
- (iv) Work with MOECCT and those with O&M responsibilities to rectify to the extent possible any failures to comply with their safeguard commitments, as covenanted in the loan agreement, and exercise remedies to re-establish compliance as appropriate.
- (v) Prepare a project completion report that assesses whether the objective and desired outcomes of the EMP have been achieved, considering the baseline conditions, and monitoring results.

343. For this purpose, MOECCT, and their contractors, FENAKA and the Island Councils will provide ADB with access to the site and all requested information on the project. For any ADB supervision missions to ongoing construction works, MOECCT and the contractors will be required to provide all ADB staff with a project site health and safety induction and adequate PPE in accordance with Table 2.7.1 of the IFC EHS General Guidelines—Occupational Health and Safety Section.

G. Capacity Development

344. Given a new PMU will be set up for the project with staff lack familiarity with EHS requirements especially international good practice those working on the project will need trainings on environmental safeguards in general and the specifics of management and monitoring requirements for the project. The contractors' staff would also need some training and awareness raising to ensure they fully understand the EMP requirements. Thus, a training program will be implemented per Table 50. These training modules will be delivered by the PMC and are not part of the contractor's cost (other than their staff attendance) but will be a part of the

project cost that includes institutional strengthening, capacity building and training for safeguards. Training modules can be changed during project implementation based on MOECCT requirements. Separate to the EMP training in Table 49 the international consultants will also deliver training to the MOECCT and EPA with respect to ESMS implementation and reviewing and approving the private sector components which are associated facilities of the project.

Table 49: Training Programme

Item	Duration/Method	Attendees	Delivered by	Estimated Cost in \$	Budget Source
Introduction to ADB's Safeguard Policy Statement (2009), IFC EHS Guidelines, National Requirements, and Project EMP	1 day face to face event	PMU Staff Contractors' Management and Environment Safeguards Teams	PMC National and International Environment Expert	2,000	PMC Contract
EMP Implementation for Pre-Construction including CEMP and CHSMP development	1 day face to face event	PMU Staff Contractors' Management, Site Engineers and Environment Safeguards Teams	PMC National and International Environment Expert	2,000	PMC Contract
EMP Implementation for Wind Energy	1 day face to face event	PMU Staff Contractors' Management, Detailed Design, and Environment Safeguards Teams	PMC National and International Environment Expert	2,000	PMC Contract
EMP Implementation for Ocean Energy	1 day face to face event	PMU Staff Contractors' Management, Detailed Design, and Environment Safeguards Teams	PMC National and International Environment Expert, together with International Marine Ecology Expert	3,000	PMC Contract TA 6603
GRM operation	1 day face to face event	GRM Focals PMU Staff FENAKA Supervision Staff Contractors' Management and Environment Safeguards Teams	PMC National and International Environment Expert	2,000	PMC Contract
Site supervision and monitoring including use of detailed monitoring framework (checklists) and preparing period Environmental Monitoring Reports	2-day face to face event	PMU Staff FENAKA Supervision Staff Contractors' Management and Environment Safeguards Teams	PMC National and International Environment Expert	4,000	PMC Contract
CAP implementation and safe handling, storage, and disposal of diesel fuel, oil residues, and lubricating oil associated with existing diesel generators	1 day face to face event	PMU Staff FENAKA management Powerhouse Staff	PMC National and International Environment Expert	2,000	PMC Contract

Item	Duration/Method	Attendees	Delivered by	Estimated Cost in \$	Budget Source
EMP Implementation for O&M handover including the SOPs	1 day face to face event	PMU Staff FENAKA management Powerhouse Staff	PMC National and International Environment Expert	2,000	PMC Contract
Total				19,000	

ADB = Asian Development Bank, EHS = Environmental, Health, and Safety, EMP = environmental management plan, GRC = Grievance Redress Committee, GRM = grievance redress mechanism, IFC = International Finance Corporation, PMC = Project Management Consultants, PMU = Project Management Unit

H. Environmental Management Plan Implementation Schedule and Budget

345. The indicative implementation schedule is shown in Chapter III, Table 17. The contractors will submit a more detailed project implementation schedule. During the pre-construction period, a formal screening option will be obtained by PMU from the EPA under the EIA regulations and the requisite national environmental clearance will be obtained before any contracts are awarded except in the case of the pilot projects and agricultural intervention where the feasibility studies will need to be completed first. In these cases, the feasibility studies will not be approved until the environmental clearance has been obtained from EPA and the contractor will need to program this procedure into their program. Strictly no contracts will be awarded before the EMP has been incorporated into the contract documentation. Further, no site establishment or construction activity is to take place before the PMU has received and approved the detailed design and requisite contractor's CEMP and CHSMP including all sub-plans.

346. Necessary budgetary provisions must be made by MOECCT, and its contractors, to ensure financial resources are available for implementing the environmental measures of the project. For the EMP implementation a sum of about \$2–3 million is estimated to be required with \$0.25 million counterpart funds set aside for environmental and social mitigation cost covering items such as EPA application costs, compensatory plantation etc. This budget will also be used for non-resource person costs for conducting the training and supervision and monitoring throughout project implementation. For contract and consultancy related costs these are only an estimate, since these are subject to competitive bidding it will be for the contractor/consultants to reflect in their BOQ and ensure adequate budgeting is provided in their bids for the EMP implementation. The indicative costing breakdown for the ASSURE project is shown in Table 50.

Table 50: Indicative Costing for Environmental Management Plan Implementation

Mitigation Measures	Estimated Cost in \$	Budget Source
PMU Consultant Support		
PMU Environment Officer for the 5-year implementation period (@2000/month for 5 years)	120,000	PMU Consulting Services Budget
PMU Social (Community Liaison) Officer for the 5-year implementation period (@2000/month for 5 years)	120,000	
PMC Consultant Support		PMC Consulting Services Budget
International environmental specialist (1 for 6.5 PM intermittent @ 16,500/month)	107,250	
National environment specialist (1 for 12 PM intermittent @ 7,500/month)	90,000	
National terrestrial ecologist (1 for 3 PM intermittent @ 7,500/month)	22,500	
National marine ecologist (1 for 12 PM intermittent @ 7,500/month)	90,000	
EMP Training Cost - see training table for details of activities	18,000	
TA 6603 Consultant Support		ADB TA Budget
International marine ecology expert (1 x 4.5 PM intermittent @ 25,000/month)	112,500	
EMP Training Cost - see training table for details of activities	1,000	
Contractor Staffing Costs		Contract Cost
E&S Expert (@ 1,500/month for 36 months X up to 13 contract packages/lots)	702,000	
health and safety Expert with NEBOSH/IOSH (@ 1,500/month for 36 months X up to 13 contract packages/lots – additionally EHS officers and health and safety stewards are required for packages/lots having multiple islands/sites the numbers of which are unknown and will need to be determined by the contractors based on their scope of work)	702,000	
Terrestrial Ecology Expert – Wind Pilot (@ 1,500/month for 36 months)	54,000	
Marine Ecology Expert – Ocean Pilot (@ 1,500/month for 36 months)	54,000	
Implementation of Existing Facilities Corrective Action Plan @ \$5,000 per substation	100,000	FENAKA O&M Budget
Contractor's Mitigation Plan Cost including PPE provision @ 1% of \$51m contract cost for 13 contract packages/lots	510,000	Contract Cost
Contractor's Quantitative Environmental Monitoring - see EMOP (Appendix 16) for details of activities	127,500	Contract Cost
Compensatory Reforestation (LS)	25,000	E&S Mitigation Budget Counterpart Fund
EPA application cost, Ongoing Consultation, GRM Implementation, including COVID-19 Precautions for Consultation or GRC Meetings to cover ad hoc cost of printing leaflets, purchasing masks and hand sanitizers for consultees, hire of venue or food purchase etc. (LS)	25,000	E&S Mitigation Budget Counterpart Fund
TOTAL	2,980,750	

ADB = Asian Development Bank, EHS = Environmental, Health, and Safety, EMP = environmental management plan, EMOP = environmental monitoring plan, GRM = grievance redress mechanism, IOSH = institute of occupational safety and health, NEBOSH = National Examination Board in Occupational Safety and Health, PMC = Project Management Consultants, PPE = personal protective equipment.

Initial Environmental Examination

Document Stage: Draft
Project Number: 55191-001
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Maldives: Accelerating Sustainable System Development Using Renewable Energy Project

Appendix 16

This initial environmental examination is a document of the borrower. The views expressed herein do not necessarily represent those of ADB's Board of Directors, Management, or staff, and may be preliminary in nature. Your attention is directed to the [“terms of use”](#) section on ADB's website.

In preparing any country program or strategy, financing any project, or by making any designation of or reference to a particular territory or geographic area in this document, the Asian Development Bank does not intend to make any judgments as to the legal or other status of any territory or area.

Table 1: General Project Environmental Management Plan

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
A. Planning and Detailed Design/Pre-construction (also see following tables)							
Compliance with regulatory requirements and international good practice	General impacts and risk on project affected persons, including construction and O&M workers and local communities General General	Comply with all applicable national laws and regulations, conditions of permits and clearances, ADB's SPS 2009, and IFC EHS guidelines in addition to the measures in this mitigation plan and the environmental codes of practice-if any conflict between requirements the most stringent requirements will be followed Contractor will not engage in any activities described on the ADB Prohibited Investment Activities List in Appendix 5 of ADB's SPS (2009) Contractor will have in place corporate environment, health and safety policies and corporate environment, health, and safety management system certifications, such as, ISO 14001 for environment, ISO 45001 for health and safety, or local equivalents.	No breaches of national laws and regulations and international good practice requirements	Counterpart funding and contract budget	PMU and Contractor	E&S team of PMU with support PMC	Upon loan effectiveness for MOECCT Upon award of contract for contractor
Compliance with environmental assessment and other permitting and clearance requirements		Submit written screening requests for all individual project components to the EPA except rooftop solar and obtain screening opinions and subsequent environmental clearance	No breaches of environmental assessment or other permitting or clearance requirements Copies of all screening letters, environmental clearances, and other permits and clearances submitted in EMR for period in which they were obtained Updated IEE and EMP disclosed on ADB website and locally by MOECCT before related works start	Counterpart funding and PMC budget	PMU Contractor to immediately inform PMU if unanticipated impacts identified	E&S team of PMU with support PMC	Prior to the commencement works
		Obtain all other permits and clearances from island councils/government agencies					Prior to the commencement works
		Disclose in a timely manner the IEE report including the executive summary in Divehi, any updates to it, and other environment safeguards documentation by posting them on the MOECCT website with copies in Island Council, Powerhouse and Construction Site Offices. If requested a printed copy of the IEE will be provided and if required translated into Dhivehi free of charge on request.					Prior to the commencement of work and then throughout project implementation
		If a change in project scope, design or layout occurs during project implementation, or if unanticipated impacts are identified at any point, immediately inform ADB and if required update the IEE and EMP for clearance and disclosure by ADB					Throughout project implementation, for pilot projects and agricultural interventions prior to commencing works
Ongoing meaningful consultation and awareness raising	PMU to prepare detailed communication plan upon loan effectiveness to be followed by them and third parties including that in the context of the COVID-19 pandemic all consultations are carried out following latest national COVID-19 requirements and WHO social distancing and hygiene guidelines as detailed in Appendix 12 of the IEE report. To facilitate liaison with the local community and project workers the contractors EHS teams are required to speak Dhivehi and English in addition to the language of their contractor. Island councils, local communities as well as individual property owners are to be consulted by the contractors when selecting sites for temporary construction facilities prior to finalization of their location. Provide at least one-month advance notice to local communities about the schedule of, location plan, and details of planned construction works, including anticipated traffic disruption, if any, along access roads through consultation meetings, notices at project site and Island Councils to help manage any disruption and disturbance and potential conflicts with the local communities and then keep communities updated of progress and changes in schedule throughout construction works, especially those with properties adjacent to active construction works to keep them fully informed of the nature of those works and their schedule. Contractors to undertake construction and electrical safety community awareness raising activities in local communities and with local schools prior to construction and	Communication plan developed reflecting the ongoing consultation requirements per the IEE Local communities and other concerned stakeholders kept informed throughout project implementation and awareness raised. Consultation and awareness raising undertaken documented and reported in EMRs including photos and records of participant (including gender breakdown)	Counterpart funding and contract budget	PMU and Contractor	E&S team of PMU with support PMC	Upon loan effectiveness for MOECCT Upon award of contract for contractor	

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
		again on the completion of works having greater emphasis on electrocution and other operational risks to members of the public.					
Establishment and operation of a GRM to deal with project grievances		<p>Identification of GRM focals and posting of contact details including SMS numbers for PMU and contractor focals at Island Council, Powerhouse and Construction site offices.</p> <p>Contractors to ensure that signage is prominently visible at the construction site detailing site-level GRM focals contact details with SMS numbers</p> <p>Undertake community awareness raising on each island of the GRM existence as well as the process and means of submitting a project grievance; awareness raising activities are to be documented.</p> <p>Contractor's EHS team will act as site level GRM focals and keep the local communities informed of the status of work and be readily available on-site to receive, document, and deal with any grievances at the site level.</p> <p>Contractors to carry out awareness raising for workers about the GRM at the start of their employment on site including disseminating GRM contact details on noticeboards at construction site offices.</p> <p>Encourage use of the GRM yet clarify that this does not prevent affected persons from pursuing any legal action, if they feel it is needed, and inform communities about the ADB Accountability Mechanism and their possibility to resort to it if any grievance is not resolved by the project level GRM.</p>	<p>GRM per IEE operationalized, affected persons aware of its existence and are actively using it to raise their grievances</p> <p>Details of GRM operationalization including photos of awareness raising activities to be submitted in first EMR.</p> <p>100% grievances received are recorded and resolved in a timely manner with those reported or resolved during the period to be reported on in the subsequent EMR</p>	Counterpart funding and contract budget	PMU and Contractor	E&S team of PMU with support PMC	<p>Upon loan effectiveness for MOECCT</p> <p>Upon award of contract for contractor</p>
Bidding and contract documentation		<p>PMU to ensure the requirement to comply with the EMP and any updates to it forms an integral and binding part of bidding and contract documents.</p> <p>PMU to ensure the contract includes appropriate incentives and/or penalties for (non-) compliance by the contractors.</p> <p>Contractors will ensure all their subcontractors and third parties, irrespective of being formally or informally employed by them, also comply with the final EMP and any updates to it, as well as their own CEMP and that this responsibility is cascaded down any chain involved.</p> <p>Contractors will budget for all the EHS staff, mitigation measures and monitoring required. Contractor will comply with any corrective action required and cover the costs where that corrective action is due to non-compliance on behalf of the contractor, its subcontractor or third parties.</p> <p>Contractors will put in place appropriate incentives and/or penalties for (non-)compliance by workers related to use of PPE and worker code of conduct, etc.</p>	<p>Definitive EMP cleared by ADB (as disclosed on ADB's website) and related provisions included in both the bidding and contract document for all contract works packages.</p> <p>No breaches of the EMP requirements by contractor, subcontractor or other third parties with prompt corrective action being taken if required.</p>	Counterpart funding and contract budget	PMU and Contractor	E&S team of PMU with support PMC	<p>Prior to issue of bidding and contract documents by MOECCT</p> <p>In submission of bids and upon award of contract for contractor</p>
Safeguard staffing and capacity development, construction worker labor welfare and local employment opportunities		<p>Contractors to comply with national labor, health and safety regulations for protection of workers</p> <p>PMU to appoint suitably qualified and experienced staff per the EMP requirement upon loan effectiveness to undertake supervision and monitoring including holding monthly EHS meetings</p> <p>PMU E&S team to prepare a detailed training plan upon loan effectiveness elaborating how training and awareness raising activities required by EMP will be conducted and with the support PMC conduct required training sessions on EMP implementation and GRM operationalization for all those with management responsibilities to clarify requirements, roles and responsibilities, record keeping and reporting at each stage of the project</p> <p>Contractors to appoint suitably qualified and experienced staff per the EMP requirement upon contract award and ensure that each active construction site has adequate health and safety supervision to ensure the health and safety of all workers</p>	<p>100% of required EHS staff are on board to oversee EMP implementation, environment safeguard staff to be detailed in EMR.</p> <p>Detailed training plan reflecting EMP requirements developed upon loan effectiveness and training records are maintained.</p> <p>Trainings and awareness raising delivered in accordance with the training plan, records of training shared through EMR.</p>	Counterpart funding and contract budget	PMU and Contractor	<p>E&S team of PMU with support PMC</p> <p>E&S team to oversee EMP providing guidance and corrective action as required, and recording construction activities and EHS conditions</p>	<p>Upon loan effectiveness for MOECCT</p> <p>Upon award of contract for contractor</p>

		<p>and local communities; at least one EHS supervisor per island and health and safety steward(s) for each active construction site where there are multiple islands/sites.</p> <p>Contractors to ensure all members of their project management team, EHS team, design team, and construction management team attend PMU trainings on EMP requirements.</p> <p>Contractors to conduct their own trainings for their construction management and provide all workers and visitors on site, irrespective of them being formally or informally employed by the contractor, subcontractor or third party with an EHS induction before being allowed on site including dos and don'ts in relation to the construction site, overnight accommodation, code of conduct and interaction with local communities, etc.</p> <p>Contractors to ensure topics covered by training and induction will include but not be limited to: good housekeeping at all times; environmentally safe and sound waste management practices; hygiene and communicable disease prevention including COVID-19 and HIV/AIDS; sexual exploitation, abuse and harassment prevention; code of conduct and culturally acceptable practices; biodiversity conservation awareness; fire safety prevention; prohibition on fishing etc. by workers; chance find procedures; health and safety including use of PPE; etc.</p> <p>Contractors to conduct regular emergency preparedness and response drills involving all workers irrespective of them being formally or informally employed by contractor, subcontractor or third-party to prepare them in case of an EHS incident including spillage, fire, natural disaster, disease outbreak, drowning etc. Training for construction management will include modules on first aid and fire safety including include training on how to use first aid and firefighting equipment provided on-site, risks of working over or adjacent to waterbodies, and the scenario of potential or confirmed COVID-19 infection on-site.</p> <p>Contractors to continue to deliver short monthly EHS refresher sessions to construction management and all workers and cover pertinent EHS topics on daily basis in toolbox talks to be delivered to all workers. Records of all training activities are to be retained.</p> <p>Contractors to ensure workers with a specific role have before being allocated the task attended specialized health and safety trainings related that role e.g., first aiders, fire safety officers, as well as ensuring workers have task-specific trainings for working at height, working with electricity, working over water etc.</p> <p>Contractors must not discriminate in employment of workers and must proactively encourage the employment of suitably skilled women on the project.</p> <p>Contractors must proactively encourage local employment for unskilled roles whilst ensuring suitably qualified and experienced workers for skilled roles; local labor can undertake manual work with adequate health and safety training and eligible local workforce can have clerical and office jobs.</p> <p>No child will be employed, and no under 18s will be engaged on the construction site (hazardous work)</p> <p>GRM will be available to workers for receiving and handling complaints about unfair treatment or unsafe living or working conditions, ensuring no coercion nor reprisal</p> <p>Contractors to provide at least one 24-hour rest day a week and 30 days sick leave for construction workers; over 48 hours work overtime will be separately paid.</p> <p>Contractors to provide medical/accident insurance or otherwise ensure medical bills will be covered for all workers irrespective of them being formally or informally employed by contractor, subcontractor or third-party.</p> <p>Contractor's insurance must include a community liability clause for the payment of compensation in case of any accidents because of construction.</p>	<p>Contractor and construction workers fully aware of their responsibilities under the EMP through training</p> <p>No breaches of the EMP requirements by contractor, subcontractor or other third parties with prompt corrective action being taken if required.</p>			on-site through photos etc.	
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Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
Detailed design, location of and access to project components	Impacts of detailed design not adequately assessed prior to construction	Contractors to ensure that detailed designs reflect the requirements of this EMP and the international engineering best practice/good EHS practices and consider bioengineering techniques On completion of the detailed design, MOECCT will consult ADB regarding the need to update the IEE. If deemed necessary the IEE and EMP will be updated, reviewed, and cleared by ADB prior to detailed design approval and the start of the construction works.	PMU approved detailed designs minimize impacts and risks on EHS during subsequent stages of the project	Contractor to reflect in contact costs	PMU through PMC to employ ecologist for survey work under the E&S team. Contractor to prepare detailed design and undertake additional baseline surveys as per the EMoP PMU to review detailed design with support of PMC to confirm all EMP measures adequately incorporated	E&S team of PMU with support PMC	Pre-construction stage; compliance prior to approval of detailed design and any works commencing on site including site establishment
	Encroachment into protected areas, ecologically sensitive zones, natural habitats or physical cultural resources	All project sites and layouts will be as described in the IEE, any changes to project locations or layouts will require consultation with ADB and if required the IEE/EMP updated to address associated impacts before the detailed design is approved. PMC ecologists to map the habitats beneath the project footprint, reconfirming no protected areas, ecologically sensitive zones, if modified or natural habitat is present, and listing species encountered. Presence or absence of sensitive ecological receptors and critical habitat species identified in the IEE to be confirmed by PMC ecologist. The ecologist will enumerate the number and species of trees requiring to be cut/lopped based on the detailed design confirming numbers have been minimized to the extent possible prior to the detailed design approval. Adaptive management measures are to be applied according to the findings of the surveys, e.g., relocation of foundations to avoid tree roots, etc. The PMC ecologist will identify the number of trees for compensation plantation and identify and agree with the Island Council locations for this plantation to take place. PMC environment expert to map physical cultural resources in the project footprint, presence or absence as identified in the IEE to be confirmed by PMC environment expert	No project sites encroach into protected areas, ecologically sensitive zones, natural habitats or physical cultural resources (except ocean energy in marine environment affecting natural habitat and rooftop solar permitted on the mosque roofs)				
	Disturbance to coastal vegetation, beach and adjacent marine habitat, cutting of trees within the footprint	No clearance of any vegetation within 20m of the coast is allowed. Carefully design the layouts within the allocated sites to avoid or at least minimize the need to cut/trim trees. All project sites and layouts will be as described in the IEE, any changes to project locations or layouts will require consultation with ADB and if required the IEE and EMP to be updated to address associated impacts on vegetation clearance and tree cutting before detailed design is approved. Contractors to ensure that there is no illegal or accidental clearing of vegetation, felling of trees or disturbance of fauna.	Minimal clearance of vegetation and trees in the project footprint.				
	Disturbance to residential areas	Sensitive use of drones during planning surveys with permission from Island Councils with nearby residents informed in advance All project sites and layouts will be as described in the IEE, any changes to project locations or layouts will require consultation with ADB and if required the IEE and EMP to be updated to address associated impacts on residential areas before detailed design is approved.	Project sites other than works in powerhouses, along existing roads for cables, and rooftop solar are located as far as possible from residential areas				
	Geological risks including earthquake	All designs for foundations and structures shall follow GIIP seismic design codes and be reviewed by an engineer independent to the contractor's designer to confirm that this is the case	PMU approved detailed designs are resilient to geological risks				
	Climate change risks including cyclones and strong winds	All designs will incorporate climate change adaptation measures per the climate risk assessment including use of compact and preassembled systems resistant to marine/coastal environments and foundations that are designed for worst case wind loading	PMU approved detailed designs are resilient to climate change risks				

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
	Exposure to hazardous materials and working conditions	Use of any asbestos containing materials, chlorofluorocarbons (CFCs) including halon, PCBs and SF6 is prohibited. Use of SF6 in fire extinguishers provided to be avoided. No oil filled transformers will be used. Designs to comply with the reference levels of the International Commission on Non-Ionizing Radiation Protection (ICNIRP) for EMF exposure.	PMU approved detailed designs minimize impacts and risks on EHS during subsequent stages of the project				
Construction planning and management	Impacts due to inadequate EHS planning and management prior to construction	<p>Contractors to develop a Construction Environmental Management Plan (CEMP) and Construction Health and Safety Management Plan (CHSMP) reflecting the EMP requirements including the ECoP and international engineering best practice/good EHS practices for their contract and submit to PMU for approval prior to any works commencing on site. These will be living documents, to be updated as required and re-approved by PMU if the construction methods or site conditions change, in response to an accident, incident, near miss etc.</p> <p>Environment Provisions</p> <ul style="list-style-type: none"> CEMP to provide details on how the contractor plans to implement the construction mitigation measures specified in this EMP and relevant parts of the IFC EHS General Guidelines including the Construction and Demolition section. CEMP will include Construction Method Statements identifying all construction activities, schedule, off- and on-site access routes, anticipated traffic volumes, and construction methods to be used as well as temporary construction facilities needed and their location e.g., laydown areas, stores, construction workers rest areas, kitchen facilities, toilets/washrooms, overnight accommodation etc. Include in CEMP (i) prohibitions on fishing etc. (ii) an emergency fauna rescue and handling procedure, including contacts of nearest veterinary etc. (iii) measures to avoid the spread of invasive species, and (iv) a Chance Find Procedure for physical cultural resources in accordance with the ECoP. CEMP to include a Pollution Prevention sub-plan covering dust and emissions to air management, noise management, the protection of water resources and environmentally sound and safe storage, use, and disposal of all fuels, chemicals and oils used on site and an emergency preparedness and response plan in the event of any leaks or spills or an incident such as flood in accordance with national laws and regulations and the IFC EHS General Guidelines. Plan construction works within 20m of marine environment, or with no vegetation or buildings separating the works site from the marine environment, considering soil erosion issues and marine water pollution risk. Contractors to schedule all earthworks during the dry season to minimize exposed areas subject to erosion by surface water runoff. In relation to noise contractors will confirm the distance from their construction works to noise sensitive receptors to confirm if the noise standards can be met based on their construction methods or temporary acoustic barriers are required. Construction methods to ensure construction noise will be limited to 1-hour LAeq 55 (day) and 45 (night) dB(A) at the nearest adjacent residential properties or levels will not increase by more than 3 dB(A) above the background levels if obtained. If these noise levels may be exceeded, contractor to erect temporary acoustic barrier(s) around either the noise source and/or site boundary to attenuate noise to level such that noise levels will be met. Contractors to avoid soil compaction, piling or blasting and other vibration inducing activities. If these are necessary for earthworks or foundation installation, contractor to quantitatively model the noise levels that will be experienced at the adjacent properties based on their proposed construction method and the effect of 	<p>PMU approved CEMP and CHSMP minimize impacts and risks on EHS during subsequent stages of the project</p> <p>Copy of the approved CEMP and CHSMP included in EMR during period of approval</p>	Contractor to reflect in contact costs	Contractor to prepare; PMU to review with support of PMC to confirm all EMP measures adequately incorporated	E&S team of PMU with support PMC	Pre-construction stage; compliance prior to any works commencing on site including site establishment

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
		<p>additional mitigation measures to be adopted, the noise assessment will need to be submitted to PMU for review and approval alongside the detailed design. Contractor will develop a detailed assessment and soil compaction/blasting/piling management sub-plan to the CEMP addressing both the noise and vibration impacts.</p> <ul style="list-style-type: none">Contractors to identify any adjacent properties at risk of vibration damage, undertake a through pre-construction structural survey of them, supported by photographic evidence, and determine whether such buildings may require the installation of vibration monitors during construction to monitor movement. If risk of structural damage to adjacent properties identified due to current condition, consider alternative construction method or temporary relocation of occupants during works if at risk. Structural or cosmetic damage is to be repaired by contractor to at least pre-project condition at their own cost.CEMP will include a Solid and Hazardous Waste Management sub-plan dealing with all solid and hazardous waste generated in an environmentally sound and safe manner, per national regulations and the IFC EHS General Guidelines section on Waste Management. Off island movements will need to be factored in given the given the lack of suitably engineered and licensed sanitary waste facilities on the islands, for hazardous waste any transboundary movement will need to accord with the Basel Convention.Contractors to provide adequate facilities for the collection, separation, and storage of construction waste (including municipal wastes) on-site and safe transportation for composting or recycling or disposal through reputable, legitimate, licensed third parties with all waste transfer records retained. Such areas should be sufficient distance from residential properties and screened from view from them. Since all waste management facilities are off-island adequate storage will need to be provided on site prior to disposal. Leaving or disposing of construction wastes by burying them on-site or disposing of them at the island waste management facilities which are unsanitary open dumps is strictly prohibited. <p><u>Health and Safety Provisions</u></p> <ul style="list-style-type: none">Contractors to provide workers with a source of drinking water that meets EPA/WHO drinking water standards. For sources proposed for use if test results are not available from the supplier (Island Council) the contractor to undertake a baseline water quality sampling per EMoP to confirm its suitability and, if necessary, provide the additional water treatment facilities during construction to facilitate safe drinking water supply.Contractors to undertake a health and safety risk assessment through a facilitated workshop to be attended by PMU, PMC and FENEKA during the detailed design so that it can inform both the detailed design and pre-construction preparations. Health and safety risk assessment to consider both occupational and community health and safety risks resulting from all subsequent stages of the project.Informed by the health and safety risk assessment the CHSMP will include occupational and community health and safety management sub-plans as well as a labor management sub-plan addressing migrant workers and sanitation and welfare etc. Measures reflected in the health and safety sub-plans will be in accordance with the IFC EHS General Guidelines sections on Occupational and Community Health and Safety. The CHSMP will include a Construction Emergency Preparedness and Response Plan (CEPRP) including communication systems and protocols to report an emergency e.g., health emergency, work-related accident,					

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
		<p>traffic accident, accident involving the community, natural disaster including fire, virus etc.</p> <ul style="list-style-type: none">• In undertaking health and safety risk assessment and preparing CHSMP adequate attention will be given to the risks associated with COVID-19 pandemic and other communicable diseases. National restrictions for containing the spread of COVID-19 or other epidemics must be complied with, as well as further guidance detailed in Appendix 12.• Contractors to set up an accident reporting system for any health and safety incidents (near miss, minor, lost time, fatal) involving workers or community to be reported to PMU within 24 hours of occurrence with a response plan detailing the incident and how its reoccurrence will be avoided. PMU to then report any lost time or fatal incidents to ADB within 48 hours. Record of all incidents and response taken should include date, time, details of incident, treatment given and outcome, and lessons learnt for the future. Contractors will ensure all workers are covered by insurance to pay out in line with national requirements in the event of a disability or fatality.• Contractors will provide adequate sanitation and welfare facilities including hand washing by making arrangements to use existing powerhouse facilities or similar, and will provide clean PPE in sufficient quantity on-site and at overnight accommodation; contractor will also consider the ability of communities to comply with protective measures such as regular handwashing and the local health care facilities' capacity to deal with any infections agreeing with the with nearest Health Center and/or hospital for emergency cares of workers. CEPRP must include response flow chart and contact details to deal with any construction worker or community member being diagnosed with COVID-19 or similar during the work. Medical insurance will be provided by contractor for all workers with sick leave allowance to ensure symptomatic workers do not attend site; contractor will avoid no-work-no-pay policies, whereby by fear of not getting paid workers would be tempted to report to work and hide any symptoms. Public health officials must be consulted in undertaking communicable diseases risk assessment and management planning for COVID-19 or other communicable disease epidemics.• CHSMP will include a traffic management sub-plan detailing use of public roads to transport plant, materials, and equipment to site avoiding peak travel times and school starting and leaving hours when children walk along the road. Set speed limits based on national rules but also the state of the road e.g., 10-15km/hr on unsurfaced roads to avoid dust generation. On pinch points traffic management will be provided and flag persons used. <p>Code of Conduct Prepare a worker Code of Conduct and information video/brochure/leaflet for distribution to all workers during induction addressing the culturally acceptable practices etc. Code of Conduct must be informed by the CEMP and CHSMP and address the following aspects:</p> <ul style="list-style-type: none">• Zero tolerance in respect of health and safety• Requirement on always wearing PPE on site (all PPE provided free of charge by the contractors)• Zero tolerance of bribery or corruption• Respect for local community and customs, avoiding the community conflict situations• Zero tolerance of illegal and unacceptable activities/behaviour, including but not limited to engagement in: prostitution; gender-based violence/sexual exploitation,					

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		<p>abuse, and harassment; illegal sale or purchase of alcohol; sale, purchase, or consumption of drugs; gambling; fighting etc.</p> <ul style="list-style-type: none">• Alcohol and drugs policy and testing regime• Role of workers in good housekeeping• Role of workers in maintaining good hygiene including COVID-19 measures e.g., social distancing• Respect of wildlife and the environment• Description of disciplinary measures for infringement of the code of conduct and other employer rules (e.g., immediate removal from site, fine etc.)					
	Impacts due to temporary requirement for site access during construction, transport of materials and equipment to site	<p>All project sites will be accessed by using the existing road network and existing wharf/jetty where present or if absent (e.g., Raimandhoo) existing alternative boat landing facilities already available on the island. No new landing on the undisturbed beaches will be permitted, and no new access roads or wharfs/jetties constructed to facilitate project construction.</p> <p>Temporary and permanent access tracks within an allocated project site will only be constructed as described and assessed in the IEE. In case a requirement arises for access tracks not already considered, the IEE and EMP will need to be updated to address associated impacts before such works can be considered by the contractor. Creation of temporary access tracks will be minimized in length and width, to reduce impacts on terrestrial habitat and avoid land acquisition.</p> <p>If use of existing access roads by construction traffic is anticipated to cause damage to the road pavement, then the contractor to consider the need to upgrade the surface in advance of works.</p> <p>Photographic record and/or structural pre-condition surveys will be made of the pre-construction condition of existing access roads, including any public utilities or infrastructure that may be damaged during transport of materials, and land which is to be used for any temporary access tracks by the contractor before construction, including site establishment, to inform the reinstatement works. These must be documented in a PMU agreed pre-project condition report, and which will serve as a baseline in case any damage to property occurs. Contractor will be required to restore any property damage that is caused by their works including damage caused by heavy construction traffic using existing access roads to at least pre-project condition at their own cost. On completion of construction, access roads and land used for any temporary access tracks will be restored to their original condition in accordance with the agreed report.</p> <p>Boats used for transporting materials will be well maintained and operated (MAPROL 73/78) and driven by experienced boat handlers to avoid pollution, health and safety incident</p>	<p>No new access roads or wharfs/jetties constructed to facilitate project construction.</p> <p>PMU approved detailed designs for temporary and permanent access tracks within allocated project sites minimize impacts and risks on EHS during subsequent stages of the project</p>				
	Impacts due to use of natural resources, storage of materials and other establishment of temporary facilities	<p>Contractors will use locally sourced materials as far as practical to reduce transportation, but all raw materials will be sourced only from existing licensed sources. Construction water to be sourced from an existing island council supply (preferred option for potable water supplies) or rainwater harvesting if non-potable – no new water sources will be developed.</p>	<p>No temporary facilities encroach in 20m of coastal habitat or beaches or could otherwise indirectly impact adjacent marine habitat.</p> <p>Temporary facilities setup minimizes impacts and risks on EHS during subsequent stages of the project.</p>				

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		<p>Concrete batching plants and hot mix plants will not be permitted.</p> <p>Contractors to strictly locate all temporary construction facilities required within the existing Powerhouses or allocated project sites as described and assessed in the IEE, except for overnight accommodation that will be provided in existing properties off-site.</p> <p>If storage areas are required elsewhere land use is to be negotiated with the private landowner, submit land ownership papers and copy of agreement for temporary land use.</p> <p>No vegetation will be cleared for any temporary facilities.</p> <p>No temporary facilities including storage of spoil, fuel, oil and chemicals will be set up within 20m of beaches and marine habitat unless within the walled boundaries of an existing Powerhouse.</p> <p>No land requiring the cutting of trees is to be used for temporary facilities even if within the allocated project site.</p> <p>Noisy and dusty storage facilities or those that may generate sediment laden runoff or wastewater (e.g., stockpiles, refueling areas) will be located as far as possible from beaches/marine habitat and the nearest residential properties whilst laydown and storage areas that are not potential pollution sources may be located minimum 20m distant.</p> <p>Only volumes of material required for the day's work will be stored at the allocated project site; all other materials to be kept in the boundaries of existing Powerhouses.</p> <p>A photographic record will be made of the pre-construction condition of land used for temporary facilities before construction to inform the reinstatement works. After completion of construction any temporary structures will be completely removed, and the land will be restored to its earlier condition.</p>					
Site clearance	Loss of trees requiring compensatory plantation	<p>Removal of only those trees for which the permission has been granted by the island council, no vegetation and trees will be removed unless this was assessed in the IEE and EMP</p> <p>Compensatory plantation is to be undertaken for all trees to be cut at a ratio of 1:2 or 1:4 for coconut palms; the ecologist of PMC to calculate the actual requirement based on the detailed design and identify and agree suitable sites and locally native species in consultation with the Island Council.</p> <p>Contractors to implement the agreed compensatory plantation plan prior to starting the work, and then maintain these planted trees for the duration of their contract replacing any that do not survive.</p>	100% of trees cut compensated prior to the commencement of works.	Counterpart funding and contract budget	PMU and Contractor	E&S team of PMU with support PMC	Prior to the commencement of works
B. Construction (also see following tables)							
General construction activities including site establishment, site clearance, earthworks, excavation, civil works, installation, an influx of workers etc.	<p>Generation of dust from movement of vehicles for transport of materials and equipment, loading and unloading of raw materials, earthworks, excavation and civil works</p> <p>Generation of oxides of nitrogen, sulphur dioxide and</p>	<p>Comply with project EMP plus approved CEMP including the pollution prevention sub-plan, ECOP and the IFC EHS General Guidelines in relation to air quality and noise during construction works and avoid the occurrence of pollution incidents and noise and vibration disturbance to the local communities as far as practical in consultation with the Island Councils.</p> <p>Use tarpaulin covers tied down securely to the body of all vehicles and boats when transporting the loose material.</p> <p>Large heavy vehicles will not be utilized in transporting materials and equipment on islands but since the roads are unsurfaced cover roads with geotextile and stone or steel plates to minimize dust throw if there will be a high volume of traffic movement.</p> <p>Contractors will undertake weekly dust soiling checks of surfaces of the closest non-FENEKA properties during earthworks and those adjacent to unsurfaced access roads and help with cleaning of external surfaces of property if there is any dust is evident.</p>	<p>Compliance with the project level air quality, noise, and water quality standards as per chapter 2 of the IEE with quantitative monitoring per EMoP as required--if these levels are exceeded, the contractor will be required to implement additional mitigation.</p> <p>EMP/CEMP requirements successfully implemented as determined through regular site checks, photographic record etc.</p>	To be included contract cost.	Contractor	E&S team of PMU with support PMC	Prepare during pre-construction and comply throughout construction stage

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
	<p>particulate emissions by construction plant and vehicles</p> <p>Erosion of exposed soil due to surface water runoff especially during monsoon season, sediment laden runoff from exposed soil or stockpiles of loose material resulting in increased turbidity of marine water</p> <p>Generation of noise and vibration from movement of vehicles for transport of materials and equipment, loading and unloading of raw materials, earthworks, excavation, civil works, installation, an influx of workers</p> <p>Spillage or leaks of fuel, oil, and chemical used in construction impacting the quality of groundwater or marine water</p>	<p>Ensure all stationary emission sources such as diesel generator sets, and all construction vehicles are regularly serviced and maintained in good working order in accordance with manufacturer instructions and have passed emission tests; keep log of maintenance work undertaken</p> <p>Belching of black smoke prohibited.</p> <p>Keep vehicles clean to avoid transport of mud from the project site and use twice daily sprinkling of water on the project site and access roads when in active use during the dry (non-monsoon) season to suppress dust. Spraying of water will be done using just the right quantity of water to suppress dust whilst avoiding excess surface water runoff or the ponding up of water.</p> <p>Minimize soil erosion, windblown dust, and surface water runoff by reducing the extent of earthworks. Undertake sequenced construction especially for cable trenching and revegetate areas immediately construction activities are completed in one area rather than undertaking earthworks on all parts of the site to minimize the area of bare ground exposed at any one time.</p> <p>Keep stockpiles of soil, aggregate and waste materials at least 20m from the coast, keep them covered except when in active use to avoid suspension or dispersal by wind.</p> <p>Minimize double handling and drop loads for the storage and use of loose materials. For works with earthworks and excavations within 20m of the marine environment or with no vegetation or buildings separating the works site from it, contractor will install cut off ditches or use sediment fences (semi-permeable geotextile) to guard against loss of soil from surface water runoff during heavy rainfall.</p> <p>Open burning of any project-related waste is strictly prohibited.</p> <p>Noise level at nearest residential property or other sensitive receptor not to exceed project noise levels (or <3dB(A) increase if already exceeded and a baseline noise monitoring was conducted to inform this; project noise levels are per Chapter 2 IEE.</p> <p>Timing of works to be agreed in consultation with the Island Councils to choose times that will cause minimum disturbance to the local community. Strictly limit the working hours to weekday daytimes with no work on weekends, holidays, or festivals. Conduct noisy works including earthworks, excavation and trenching and traffic movements only during 8am-5pm, and avoid all construction works at night from 10pm to 7am. Loud construction noise to be kept to short periods of time in each hour. Schedule the noisy works where there is a risk of noise standards being exceeded in the vicinity of properties and mosques between 10am to 4pm and outside of lunch and prayer time to ensure the noise will not disturb residential area resting times.</p> <p>Residents within 500m will be informed well in advance of the construction schedule for noisy activities and be kept informed daily.</p> <p>Construction work adjacent schools will be scheduled to avoid classroom disturbance, in the school holidays or after hours.</p> <p>Sound levels received by workers must not be over 85 dB(A) during continuation of 8 working hours without wearing PPE.</p> <p>Construction methods and machinery are to be selected seeking to minimize ground disturbance, noise and vibration.</p> <p>Use modern, low noise generating equipment e.g., <55dBA sound pressure level at 1m.</p> <p>Follow the IFC EHS General Guidelines in relation to the use and storage of any fuel, oil, and chemical to minimize pollution incident risk including spill prevention, emergency response, spill clean-up and remediation. Fuel, oil, and chemicals actively in use to be stored in labelled, sealed containers on drip trays to provide secondary containment. In designated storage areas, they will be kept under lock and key on an</p>	<p>No outstanding air quality, dust, noise, vibration, groundwater or marine water quality related grievances from local communities or other interested stakeholders</p>				

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
		<p>undercover, impermeable surface bunded to 110% capacity and ideally located in the powerhouse.</p> <p>Refueling operations, equipment servicing and washdown to take place on an impermeable surface at least 20m away from the marine environment with all drainage directed through oil and grease interceptors before being discharged to ground.</p> <p>Provide spill response kit with sufficient absorbent materials (e.g., sorbents, dry sand, sandbags) at the stores and on-site for soaking up any fuel, oil, or chemical leaks or spills.</p> <p>Conduct regular training of workers on the pollution prevention sub-plan including good housekeeping requirements, management of earthworks and excavations to avoid sediment laden surface runoff, the environmentally sound and safe storage and use of all fuels, chemicals and oils used on site, and how to respond to and clean up leaks and spills and dispose of the contaminated sorbent material which would be treated as a hazardous waste.</p>					
Generation of construction waste and wastewater	<p>Use of raw materials for construction (cement, aggregate, sand, etc.)</p> <p>Inappropriate disposal of inert spoil from excavations in the island landscape blocking drains, resulting in windblown dust and increased turbidity of marine water</p> <p>Inappropriate disposal of solid wastes generated from project site, including packaging materials from equipment, left over/unused/ damaged/end of life parts, etc.</p> <p>Inappropriate disposal of hazardous wastes generated from project site and workers e.g., left over/used oils, lubricants, chemicals, e-wastes etc.</p>	<p>Comply with project EMP plus approved CEMP including the waste management sub-plan, ECOP and the IFC EHS General Guidelines in relation to waste management during construction works</p> <p>Construction materials (especially sand and gravel e.g., for trenching and on-site access track construction) will be sourced from existing approved sources with operating licenses, and records kept of all the materials used and their source.</p> <p>Contractors to provide adequate facilities for the handling and storage of raw materials ideally located in the powerhouses to reduce the amounts of waste caused by damage or exposure to the elements.</p> <p>Leaving or disposing of construction waste on-site or disposing of it at Island Council waste management facilities is strictly prohibited.</p> <p>Prohibit use of waste (e.g., empty cement bags and containers, plastic, wooden planks) for backfilling – only inert spoil may be used for backfilling to avoid the need for off-site disposal</p> <p>Dumping of construction waste, including any excess spoil on agricultural fields, into drains, any surface water bodies, and into the marine environment is to be prohibited.</p> <p>Prohibit open burning of construction waste.</p> <p>Balance cut and fill in the construction area as far as practical, if excess spoil needs to be taken off-site it will be disposed of on the island in conjunction with the Island Council at a location that is suitable for accepting the inert waste and in a manner that will not result in windblown dust, sediment laden surface water runoff etc.</p> <p>Contractors will quantify the extent of earthwork and excavation required and locations for disposal of excavated spoil. Records of volumes of generated and reused spoil, and all transfer and location records of the disposal off-site are to be kept by the contractor.</p> <p>Discharge of sediment laden surface water runoff directly into the marine environment is forbidden. If discharge is not to ground construction of sedimentation ponds is required to allow sediment to settle out of the water before its release of water into the marine environment.</p> <p>Packaging materials once removed to be immediately collected and stored so it cannot be blown by the wind.</p> <p>Prior to the start of works contractors will ensure an appropriate waste management collection, storage and disposal system for domestic solid waste and construction waste is established at the construction site and all overnight accommodation that is provided by the contractors.</p>	<p>Compliance with the project marine water quality standards as per chapter 2 of the IEE with quantitative monitoring per EMoP as required--if these levels are exceeded, the contractor will be required to implement additional mitigation.</p> <p>EMP/CEMP requirements successfully implemented as determined through regular site checks, photographic record etc.</p> <p>No outstanding material sourcing, waste related or marine water quality related grievances from local communities or other interested stakeholders</p>	To be included contract cost.	Contractor	E&S team of PMU with support PMC	Prepare during pre-construction and comply throughout construction stage

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	Construction waste especially packaging covers of materials if not collected and securely stored can result in litter, those blown away into marine water can block the light of corals and have direct detrimental effects on marine fauna such as entanglement and ingestion in case of species like marine turtles	<p>Encourage recovery of all waste that could either be reused or sold to recyclers rather than disposing of it, the segregated collection of waste will ensure recycling values are maximized.</p> <p>In preparation for off-island disposal collect and store all waste produced in an environmentally safe and sound manner in a designated, labelled area. Separate covered waste containers (skips, bins, drums, or bags) will be provided for all the different types of waste generated facilitating segregation for reuse and recycling purpose and correct disposal destination. Waste containers will be appropriate to their content e.g., solid waste within enclosed bins to contain leachate and avoid vermin, hazardous waste storage must incorporate impermeable concrete surface bunded to 110% volume which is not connected to the drainage system to collect spills and leaks. Sensitize workers on good housekeeping and the environmentally safe and sound storage and disposal of wastes, most importantly not to leave loose garbage lying around. Provide regular toolbox talks and ensure all workers are familiar with the need for waste management, segregation and place waste containers to collect the different wastes so they are not thrown on the floor.</p> <p>Develop a procedure/system to penalize, through escalating fines or similar, any construction workers who breach these waste management requirements.</p> <p>Solid waste collected will be regularly transported off island at the contractors cost for disposal at the licensed waste management facility of Thilafushi and not be allowed to accumulate on site over long periods.</p> <p>Hazardous collected will be regularly transported off island at the contractors cost for disposal transboundary per national regulations and not be allowed to accumulate on site over long periods.</p> <p>Document all solid and hazardous waste removed off site using transfer notes, to be taken by licensed waste contractor who should reuse/recycle or dispose of the waste according to type to suitably licensed and engineered waste management facilities.</p> <p>On completion of works, no waste will be left on the island for the Island Councils to dispose of. PMU and Island Councils to confirm all waste has been removed before handover.</p> <p>For sanitation and welfare facilities for construction workers including toilets and hand washing facilities existing facilities connected to wastewater treatment or septic tanks with soak-away will be used such as those at powerhouses, no new sanitary facilities will be established. No untreated sanitary wastewater is to be discharged direct to the marine environment or to ground.</p>					
General construction activities including site establishment, site clearance, earthworks, excavation, civil works, installation, an influx of workers etc.	Exposure to occupational and community health and safety risks	<p>Comply with project EMP plus approved CHSMP including the occupational and community health and safety sub-plans, labor management subplan, traffic management subplan, ECOP and the IFC EHS General Guidelines in relation to occupational and community health and safety, ILO guidelines on construction site health and safety¹ and labor accommodation² whilst taking a zero-tolerance approach. Contractors are responsible for ensuring health and safety of everyone on the construction site including visitors and sub-contractor workers regardless they have been formally or informally employed.</p> <p>Require all subcontractors and workers to confirm they have seen and understood the requirements of the CHSMP before proceeding with their work.</p> <p>Ensure the dedicated health and safety supervisors and stewards are always present on site when active. If staff on annual leave or off sick provide alternative supervision staff.</p>	<p>Compliance with national labor, health and safety regulations</p> <p>Zero tolerance approach to health and safety adopted</p> <p>No fatalities or lost time incidents during construction works</p> <p>100% of health and safety incidents including near miss recorded, immediately</p>	To be included contract cost.	Contractor	E&S team of PMU with support PMC	Prepare during pre-construction and comply throughout construction stage

¹ https://www.ilo.org/sector/Resources/codes-of-practice-and-guidelines/WCMS_861584/lang--en/index.htm

² https://www.ilo.org/wcmsp5/groups/public/---ed_emp/---emp_ent/---multi/documents/publication/wcms_116344.pdf

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		Enforce disciplinary systems (e.g., immediate removal from site) for non-compliance with PPE requirements and other health and safety measures	investigated, and corrective action taken to prevent repeat				
	OHS risks related to dust and noise, operation and movement of construction plant and vehicles, working conditions, road-related accidents for drivers, transport-loading and unloading risks, earthworks and excavations for trenches and foundations, electrical and fire hazards including working in vicinity to electric power, working in remote island location, etc.	<p>Require workers to observe the OHS measures in IFC EHS Guideline on Construction and Demolition and for those working with electrical equipment in the IFC EHS Electric Power T&D Guideline</p> <p>Only allow suitably trained and qualified workers to be allowed to work on electrical equipment and at height, these workers must have a training record of attending suitable training course on electrical safety and working at height and be provided with and wear the appropriate PPE for their role.</p> <p>Untrained workers must never be permitted to work with live electricity or at height.</p> <p>Provide recommended Personal Protective Equipment to workers (regardless formal and informal, directly contracted or subcontracted) in accordance with Table 2.7.1. Summary of Recommended Personal Protective Equipment according to hazard in IFC EHS Guidelines on OHS and the ILO guidelines on construction site health and safety. Provide regular worker training on health and safety and daily briefings led by the EHS supervisor, conduct regular drills on execution of the emergency preparedness and response plan.</p> <p>Ensure good housekeeping at the construction site, storage areas, overnight accommodation, etc. – these are all to be kept neat and tidy, no trip hazards e.g., no materials, equipment, trash laying around.</p> <p>Given the remoteness of the construction site ensure a qualified first aider (with immediate access to a doctor) and trained fire marshal is always available on-site with an appropriately equipped first aid kit and appropriate in-date/serviced fire extinguishers and other firefighting equipment immediately available for use. Eye wash station and water supply to shower to be provided where there is a risk of a hazardous substance encountering the skin.</p> <p>Provide an ambulance (car/boat/helicopter) which is always available on-call for the more serious cases and arrange with the nearest Health Center and/or Hospital for emergency cares of workers.</p> <p>Prepare signboards reminding of health and safety measures and procedures to follow in case of accident, including key contact details (ambulance, doctor, hospital, etc.)</p> <p>Keep a log of all occupational and community health and safety incidents, near-misses and accidents.</p>	<p>EMP/CEMP requirements successfully implemented as determined through regular site checks, photographic record etc.</p> <p>No outstanding health and safety related grievances from workers, local communities or other interested stakeholders</p>	To be included contract cost.	Contractor	E&S team of PMU with support PMC	Prepare during pre-construction and comply throughout construction stage
	<p>OHS risks related to sanitation and welfare of employees including COVID-19, HIV/AIDS and other communicable diseases spread – at project site and accommodation, etc.</p> <p>Spread of COVID-19, HIV/AIDS, and other communicable diseases to local community through unsanitary conditions or presence of project workers</p>	<p>Provision of access to sufficient existing toilet and washing facilities should be provided for the number of workers with 1 toilet per 6 workers; male and female facilities are to be provided or there should be an indication of whether the toilet facility is “in use” or “vacant” if not segregated.</p> <p>Toilet facilities used to be provided with adequate supplies of hot and cold running water, soap, and hand drying devices.</p> <p>Toilets to be cleaned at least twice a day to ensure maintained in hygienic condition.</p> <p>Provide workers with access to a shaded rest area onsite or immediately adjacent so breaks can be taken at any time they feel it is necessary.</p> <p>Provide workers with access to clean eating areas and kitchen facilities for breaks and mealtimes with a supply of drinking water meeting EPA/WHO drinking water standards.</p> <p>For workers not local to the area, suitable overnight accommodation (refer to ILO guidance on workers’ accommodation) must be provided by the contractor, use should be made of existing accommodation facilities and no worker’s camp will be established. It must be ensured each worker has their own bed and locker.</p> <p>Construction workers to follow healthy hygiene practices to lower the risk of disease spread.</p> <p>Check health condition of workers on daily basis, for example, use of a self-certification forms and temperature checks before being allowed on the construction site with more thorough monthly health checks by qualified medical professional</p>		To be included contract cost.	Contractor	E&S team of PMU with support PMC	Prepare during pre-construction and comply throughout construction stage

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
	Community conflict with project workers including sexual exploitation, abuse, and harassment	For hiring of migrant workers medical tests are to be undertaken to screen for health conditions including COVID-19 and HIV/AIDS per national procedures; for all workers not local to the area COVID-19 screening to be undertaken before travel to site Prevent standing water as it may become a breeding habitat for mosquitoes etc. Contractor staff and local communities will be given awareness raising in COVID-19 and HIV/AIDS, other communicable diseases, local culture and heritage, and sexual, exploitation, abuse, and harassment by PMU and contractors EHS team with workers having strict penalties (e.g., immediate removal from site) for any non-compliance of workers to the agreed code of conduct					
	Impacts on community health due to dust, noise, vibration, water pollution etc. Community risks due to community access to construction works including open excavations etc. Community risks related to traffic congestion and increased risk of road-related accident Risks due to accidents from community access to electrical infrastructure	Comply with project EMP plus approved CEMP including the pollution prevention sub-plan, ECOP and the IFC EHS General Guidelines in relation to air quality and noise during construction works and avoid the occurrence of pollution incidents and noise and vibration disturbance to the local communities as far as practical in consultation with the Island Councils. Restrict access to the construction sites. Erect a temporary solid fence or barriers (not tapes) and sign construction sites and open excavations with hazard warning signs to prevent public access; this is applicable to all works accessible from the public domain Do not leave hazardous conditions (e.g., unlit open excavations without a means of escape) overnight unless absolutely no access from the public can be ensured. Signboards on site boundary fences are to include key contact details in case of local community accident (contractor, ambulance, doctor, health center, hospital, etc.) In conjunction with Island Council contractor to undertake regular construction and electrical safety community awareness raising activities in local affected communities and with local schools starting prior to the construction. Drivers to strictly follow traffic management sub-plan, and all road safety regulations Ensure proper execution of traffic controls at the harbour, on the access roads, and at the site entrance including use of highly visible advance warning signs and flag persons to control loading and unloading and entry and exit, temporary gates to construction sites are to be set sufficiently far back to prevent vehicles having to stop/queue on the existing access roads etc.		To be included contract cost.	Contractor	E&S team of PMU with support PMC	Prepare during pre-construction and comply throughout construction stage
Undertaking of construction works in public domain	Hindrance to public access and road users due to use of existing access roads, wharfs/jetties and construction activities	Comply with project EMP plus the ECOP and approved traffic management subplan Boat and traffic movements to avoid periods of peak traffic, timing of deliveries to be agreed in consultation with the Island Council to minimize disturbance to harbour and road users Ensure access to public and private property is maintained throughout construction period in consultation with the residents and the Island Councils, safe access will be maintained and alternative signed routes and access will be provided if there is to be temporary diversions or blockages	EMP/ECOP/CHSMP requirements successfully implemented as determined through regular site checks, photographic record etc. No outstanding access related grievances from the local community or other stakeholders	To be included contract cost.	Contractor	E&S team of PMU with support PMC	Prepare during pre-construction and comply throughout construction stage
	Unintentional property or public utilities damage	Implement careful construction practices to avoid damage to existing structures (e.g., buildings) and roads, public utilities, drains etc. Use will be made of existing access roads; in locations where access is restricted use of manual labor utilizing push carts instead of motor vehicles to transport the materials and equipment. On completion of works restore all temporarily used sites and access roads to at least their pre-project condition following works; this will involve cleaning site of any debris or wastes, left over material and soil/rocks/sand, contaminated soil although this should have been avoided through EMP measures; revegetation if required; drainage if	No unanticipated damage to physical cultural resources because of the construction works EMP/ECOP/CHSMP requirements successfully implemented as determined through regular site checks, photographic record etc.	To be included contract cost.	Contractor	E&S team of PMU with support PMC	Prepare during pre-construction and comply throughout construction stage

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
		required; local topographical adjustments; addition of good quality soil if the latter was eroded or removed by construction works; etc.	No outstanding damage related grievances from the local community or other stakeholders				
Earthworks and excavations for trenches and foundations	Potential risk of damage to below ground resources, including undiscovered archaeological resources in case of chance find	Comply with ECOP chance find procedure; implement procedure as soon as any potential physical cultural resources encountered during the construction activities. Strictly ensure no known physical cultural resources or chance finds are tampered with. Brief workers on the known physical cultural resources and chance find protocol, the types of finds to be reported and penalties applying for tempering with them through induction and toolbox talks before the commencement of any works. Contractor to declare a chance find to MOECCT/PMU within 24h of find. MOECCT/PMU to report on any chance find having occurred within 48h to ADB.	National regulations on physical cultural resources complied with No unanticipated damage to physical cultural resources because of the construction works EMP/ECOP/CEMP requirements successfully implemented as determined through regular site checks, photographic record etc. No outstanding physical cultural resources related grievances from workers or community health and safety related grievances from local communities	To be included contract cost.	Contractor	E&S team of PMU with support PMC	Prepare during pre-construction and comply throughout construction stage
C. Operation and Maintenance (see following tables)							
N/A							
D. Decommissioning (where required, see following tables)							
N/A							

Table 1: Environmental Management Plan for Battery Energy Storage Systems, Energy Management System, and Grid Upgrades (To be Implemented in Addition to the Table 1 General Measures)

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
A. Pre-construction							
Non-compliance of existing facilities with regulatory requirements and international good practice	Pollution risks and occupational and community health and safety risks associated with existing powerhouse operations	<p>Implement the corrective action plan set out in Appendix 7 for all existing facilities (powerhouses) and submit a report on the status of actions to ADB to confirm the completion of all short-term actions before handing over the site to contractor.</p> <p>Upon handover of the project components to FENEKA undertake a third-party audit to confirm continued implementation of national laws and regulations and international good practice in the operation of FENEKA existing facilities plus compliance with long-term actions and submit the report to ADB as part of the EMR.</p> <p>In the long term, FENAKA will also prepare and implement a plan for fuel and oil storage and handling. This will include (i) improvements to the existing bunded structures at the fuel storage tanks so that they will be protected from rain and will store spilt or leaked fuel for pump-out and environmentally safe and sound disposal; (ii) redesign of the existing oil-separators; and (iii) construction of bunded, impermeable concrete areas for the storage of empty lubricant oil drums. Additionally, work practices and site environmental management need to match this requirement to ensure that no fuel, oil or other lubricant is allowed to enter the external environment.</p> <p>If the third-party environmental audit identifies non-compliance FENEKA will immediately implement the recommendations made and report on this in the next EMR.</p>	<p>Corrective action plan implemented, short term actions completed prior to handover of site to contractor and long-term actions before project closure.</p> <p>No breaches of national laws and regulations and international good practice in the operation of FENEKA existing facilities upon project closure</p>	FENAKA O&M Cost	FENEKA	E&S team of PMU with support PMC	<p>Short term actions completed prior to handover of site to contractor</p> <p>Long-term actions and environmental audit recommendations before project closure is reached</p>
Detailed design, location of and access to project components, construction planning and management	Encroachment into protected areas, ecologically sensitive zones, natural habitats or physical cultural resources	<p>BESS and EMS will be installed only within the boundaries of existing powerhouses</p> <p>No vegetation will be cleared and no trees will be cut to install the BESS and EMS in the powerhouses</p> <p>Grid upgrade cable works will be done only along the existing island roads</p> <p>No vegetation will be cleared and no trees will be cut to install cables in the existing roads</p> <p>Cable routes to avoid the area beneath tree crowns (zone for root protection) especially for mature trees.</p> <p>Contractors to provide an inventory of physical cultural resources e.g., mosques adjacent to the grid cable works to inform the construction workers of the need to avoid damage to them, and to inform the timing of noisy construction works</p>	<p>No project sites encroach into protected areas, ecologically sensitive zones, natural habitats or physical cultural resources</p> <p>No clearance of vegetation and trees within the project footprint</p>	Contractor to reflect in contact costs	Contractor	E&S team of PMU with support PMC	Pre-construction stage; compliance prior to approval of detailed design and any works commencing on site including site establishment
	Disturbance to residential area	<p>Quietest available equipment with manufacturer-supplied noise mitigation will be installed.</p> <p>Contractors to ensure that the design of the project components alone enables their operation to always comply with 1-hour LAeq 70 dB(A) at the site</p>	<p>PMU approved detailed designs minimize impacts and risks on EHS during subsequent stages of the project</p> <p>PMU approved CEMP and CHSMP minimize impacts and risks on EHS during subsequent stages of the project</p>				

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
		boundary and 45 dB(A) at the nearest residential properties (irrespective of the background noise levels from diesel generators) Routing of cables along existing roads to avoid the damage to existing buildings and structures, public utilities, street furniture etc. If existing services must be disrupted the contractors (via service providers if appropriate) to notify affected communities well in advance of any power outage etc. In relation to cumulative impact liaise with other utilities regarding the timing and extent of other construction works in the same location and ensure plans for construction works are coordinated so emissions/disruption/ disturbance are minimized.					
	Unintentional property or public utilities damage	For private property or public utilities/street furniture that may be damaged during construction, including from potential breaking/drilling vibration damage (buildings, roads, drains etc.) photographic and/or structural pre-condition surveys are to be completed and agreed with MOECCT prior to any works, including site establishment. To be documented in a pre-project condition report, which will serve as baseline in case any inadvertent damage or vibration impact to property occurs. If risk of structural damage to adjacent properties from vibration identified due to current condition, consider alternative construction methods or temporary relocation of occupants during works if at risk. Check with public service providers (electric, water, telecoms) whether there are known pipes, cables, or other utility lines and carry out a scan using cable avoidance tool to identify any unknown underground utilities prior to excavation. Contractors to identify in consultation with service providers appropriate measures to minimize period of disruption to utilities and reduce health and safety risks during installation.	PMU approved CEMP and CHSMP minimize impacts and risks on EHS during subsequent stages of the project				
	BESS building design results in EHS impacts	Minimize visual impact and clutter in locating the above ground equipment, BESS buildings are to be in keeping with the local vernacular of the existing powerhouse. For BESS buildings and containers provide adequate natural and/or artificial lighting levels to meet the IFC EHS Guidelines on Occupational health and safety (Table 2.3.3. Minimum Limits for Workplace Illumination Intensity) -- design to ensure that all lighting is of energy efficient LED type with solar powered LED lighting where practical. Use of fluorescent/HPSV lamps will be avoided since they are less energy efficient and classed as hazardous waste for purposes of disposal. For BESS buildings take a life-cycle approach to detailed design, considering the use of construction materials and the energy efficiency of the building that must be kept cool during operation adopting the "green building" concept e.g., using natural cooling for reducing the need for air conditioner. Detailed design to include rainwater harvesting and enable FENEKA to readily fit solar panels on any building rooftop once operational. Final surface level of foundations will be at least 1 m above the existing ground level or highest flood level including an allowance for climate change based on the findings of climate change assessment prepared for the Project (whichever is higher) Foundations to be constructed in such a way as to be adequately drained to prevent washout.	PMU approved detailed designs minimize impacts and risks on EHS during subsequent stages of the project				
	Occupational and community health and safety risks to FENEKA	Ensure maximum sound power level of equipment at 1 m is 85 dBA, if these noise levels will be exceeded OHS noise warning signage identifying the ear protection to be worn must be installed.	PMU approved detailed designs minimize impacts and risks on				

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
	staff and public from electrical infrastructure	All electrical hazards will feature written and visual warning signs that meet the IEEE standards to include the ISO 7010 "Hazard Type: Electrical Symbol" warning of the risk of electrocution. To prevent against cable break incident of new cables, cable markings will be installed above the cable to inform those who may be excavating in future. In case the armour is broken by a third party and the core damaged, protection relays to which the cables connect will be designed to detect this and stop sending electricity immediately by automatically opening switchgear to prevent a live shock to the person.	EHS during subsequent stages of the project				
	BESS health and safety risks	Location of battery storage building or container away from normal work areas of FENEKA. BESS will be installed with adjacent fresh water tap with eye wash and shower in case staff come into contact with the battery solution. Batteries bought for the project will be of high quality and come in prefab casing with built in automatic fire alarm system, fire extinguishers and sand buckets will also be provided. Provide automatic fire alarm and fire suppression system in buildings and containers with emergency exit signage. Provide fire extinguishers (for electric fires) in a prominent, signed location near to fire-risk locations with service and expiration dates clearly labelled along with posters on fire safety. Provide fully stocked, in-date first aid kit installed in a prominent, signed position, first aid posters and emergency contacts to also be displayed. Display material data sheets for any fuels, oil, or chemicals used in the BESS.	PMU approved detailed designs minimize impacts and risks on EHS during subsequent stages of the project				
O&M	General impacts and risk on project affected persons, including O&M workers and local communities	Develop in conjunction with FENEKA an O&M Plan for the BESS, EMS and grid upgrades setting out the schedule of inspections, maintenance required, and all EHS measures to be followed during any maintenance works. O&M Plan to be informed by a facilitated risk assessment and include a health and safety Plan and an Emergency Response and Preparedness Plan in relation to the BESS operation	O&M Plan included in handover to FENEKA to minimize impacts and risks on EHS during subsequent stages of the project	Contractor to reflect in contact costs	Contractor	E&S team of PMU with support PMC	Pre-construction stage; compliance prior to handover to FENEKA
	Impacts from inappropriately disposed used batteries	Include in the bidding document and contract agreement with suppliers for disposal of used batteries as hazardous waste. Hazardous waste collected will be regularly transported off island at the contractor (suppliers) cost of disposal transboundary per national regulations and not be allowed to accumulate on site over long periods. Contractor will provide a leak proof, fully enclosed battery collection system to FENEKA allowing the environmentally safe and sound temporary storage of the used battery cells whilst awaiting disposal.	Provisions for disposal of batteries by supplier included in both the bidding and contract document for all contract works packages. No breaches of the EMP requirements by contractor.	Counterpart funding and contract budget	PMU and Contractor	E&S team of PMU with support PMC	Prior to issue of bidding and contract documents by MOECCT In submission of bids and upon award of contract for contractor
B. Construction							
Noisy construction work	Disturbance to fauna using adjacent forest and coastal vegetation	For powerhouses with forest and coastal vegetation adjacent noisy works only permitted from one hour after sunrise to one hour before sunset to minimize its disturbance	EMP/ECOP/ CHSMP requirements successfully implemented as determined through regular site checks, photographic record etc.	To be included contract cost.	Contractor	E&S team of PMU with support PMC	Prepare during pre-construction and comply throughout construction stage
	Disturbance to mosques	For powerhouses with mosques adjacent no noisy works will be undertaken during prayer time; same will apply to the cable laying adjacent to mosques					
Trench digging and cable laying for cable upgrades	Difficulty in road access and health and safety risks during the	Trenching and cable laying work will be carried out as fast as possible; the trenches will only be left open for a single day Whole roads will not be blocked with temporary diversion plans following the traffic management sub-plan as needed Work will be barricaded with solid moveable fences/barriers, warning signs, lights, and flag persons provided to control pedestrian and traffic movement	No outstanding grievances from local communities or other stakeholders				

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
Disposal and management of batteries	Impacts from inappropriately disposed defunct batteries during installation	Any batteries that are rejected during installation and commissioning due to damage or failure will immediately be removed from the site and returned to the supplier as per O&M requirements	100% of batteries disposed of by the supplier, no batteries remaining on site for disposal Compliance with national laws and regulations. EMP requirements successfully implemented as determined through regular site checks, photographic record etc.	To be included contract cost.	Contractor	E&S team of PMU with support PMC	Prepare during pre-construction and comply throughout construction stage
C. Operation and Maintenance							
O&M	General impacts and risk of powerhouse and grid network including BESS and EMS on project affected persons, including FENEKA O&M workers and local communities	Implement the agreed O&M Plan During maintenance activities all the mitigation measures applicable to the construction stage are also applicable to FENEKA maintenance workers or contractors and are to be followed, including strict prohibitions on workers. Regular visual and technical inspection of condition and maintenance as required to be carried out, keep photographic records and log of all inspections, including register of faulty equipment found, and actions taken in response. Electrical equipment and electric wiring to be checked for safe current and voltage ratings. Maintain all noise generating project equipment to ensure noise to be limited to the following as 1-hour LAeq: (i) 70 dB(A) at the site boundary; (ii) at residential properties, 55 (day) and 45 (night) dB(A) Ensure all liquids (fuel, oil, or chemicals) are stored in an undercover area with impermeable floor with spill containment bund of 110% capacity under lock and key. Label all drums and containers with their content and potential risk signs (e.g., flammable, corrosive, toxic, etc.) and always keep spill prevention equipment available on site. Display material data sheets for any fuels, oil, or chemicals used on site. Keep spill prevention equipment available on site.	Project infrastructure maintained in working order and is always in good condition. Compliance with national laws and regulations. EMP/O&M Plan successfully implemented by FENEKA as determined through regular site checks, photographic record etc. No outstanding O&M related grievances from local communities or other stakeholders	FENEKA O&M	FENEKA	FENEKA supported by E&S team of PMU and the PMC for duration of project	Prepare during pre-construction and comply throughout O&M stage
	General occupational and community health and safety risks of powerhouse and grid network operations including BESS and EMS	Implement the agreed O&M Plan Ensure all O&M staff have received appropriate OHS trainings for their role including for the additional health and safety risks related to the BESS and EMS O&M. ³ Always keep the additional operational area of the BESS neat and tidy. Store equipment in a dedicated, covered, labelled storage area (materials, tools, equipment, and any spare parts). Remove any trip hazards on the ground, e.g., open channels, materials, equipment, trash laying around. Visually inspect for any standing water around the BESS building or container, and when identified, remove, or provide appropriate drainage to remove it in a timely manner; ensure the drainage system is not blocked and fully operational. Display clear emergency exits signs (in working order, if light signs, ensure works) in the BESS buildings and containers and keep all the exits clear of any blockage. Maintain all lights in working order. Ensure all vents free of blockages and regularly maintained. Ensure a recent, full, first aid kit and adequate firefighting equipment is always available on site, stored in clearly labelled and easily accessible area. Replace	Compliance with national laws and regulations. EMP/O&M Plan successfully implemented by FENEKA as determined through regular site checks, photographic record etc. Zero project-related health and safety accidents reported during O&M No outstanding O&M related grievances from local communities or other stakeholders	FENEKA O&M Cost	FENEKA	FENEKA	Prepare during pre-construction and comply throughout O&M stage

³ Training on the operation and maintenance of the lithium ion and flow batteries will be provided by the EPC contractor to the FENAKA operators.

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
		the first aid equipment timely as required to keep all equipment within its expiry date. Service the firefighting equipment timely as required to keep all equipment in date. Provide first aid and firefighting training to select, volunteer staff in relation to the BESS; at least one staff having recently carried out first aid and firefighting training must be always present on site. Refreshers are to be provided once a year. Hang posters showing first aid procedures especially for electrocution, and fire procedures, as well as listing all emergency contacts. Display the emergency phone number and location of first aider, doctor, health center, and hospital in a clear and easily accessible location. Ensure BESS buildings and containers are structurally sound if any earthquake occurs, check building soundness prior to allowing workers back. Keep BESS buildings and containers always locked (except when workers are in-coming or exiting) but at times when the door is unlocked, ensure one staff is always present to control any unauthorized entry. Carry out periodic safety related awareness raising in local communities living in proximity to electrical installations, including but not limited to, electrocution risks.					
Disposal and management of batteries	Impacts from inappropriately disposed defunct batteries during installation	Use batteries according to given guidelines to maximize their lifetime and reduce the need for disposal. FENEKA O&M Plan will include an emergency plan that will be put in place in case of the accidental bursting of the batteries. Dispose the batteries as hazardous waste to a hazardous waste management facility requiring the transboundary disposal under the Basel Convention since facilities do not exist on the Maldives. Handling and disposal of used batteries shall be done in compliance with Waste Management Policy and Waste Regulations (2013) of Maldives as well as in compliance with Basel Convention on the Control of Transboundary Movement of Hazardous Wastes and their Disposal (1989). Replaced battery cells will be temporarily stored in the leak proof, fully enclosed battery collection system until they are removed off site by the contractor (supplier) – as per contract agreement with suppliers for the disposal of used batteries Only dry batteries will be transported to avoid possible leakages.	100% of batteries disposed of by the supplier, no batteries remaining on site for disposal Compliance with national laws and regulations. EMP successfully implemented by FENEKA as determined through regular site checks, photographic record etc.	FENEKA O&M	FENEKA	FENEKA supported by E&S team of PMU and the PMC for duration of project	Prepare during pre-construction and comply throughout O&M stage
D. Decommissioning							
Dismantling BESS batteries	Impacts from inappropriately disposed used batteries	Use batteries according to given guidelines to maximize their lifetime and reduce the need for disposal. Dispose the batteries as hazardous waste to a hazardous waste management facility requiring the transboundary disposal under the Basel Convention since facilities do not exist on the Maldives. Handling and disposal of used batteries shall be done in compliance with Waste Management Policy and Waste Regulations (2013) of Maldives as well as in compliance with Basel Convention on the Control of Transboundary Movement of Hazardous Wastes and their Disposal (1989). Replaced battery cells will be temporarily stored in the leak proof, fully enclosed battery collection system until they are removed off site by the contractor (supplier) – as per contract agreement with suppliers for the disposal of used batteries	100% of batteries disposed of by the supplier, no batteries remaining on site for disposal Compliance with national laws and regulations. EMP successfully implemented by FENEKA as determined through regular site checks, photographic record etc.	FENEKA O&M	FENEKA	FENEKA	Prepare during pre-construction and comply in decommissioning

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
		Only dry batteries will be transported to avoid possible leakages.					

Table 32: Environmental Management Plan for Solar Photovoltaic (Rooftop and Ground Mounted) Systems (To be Implemented in Addition to the Table 1 General Measures and Table 2 re Battery Energy Storage Systems and Cable Works)

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
A. Pre-construction							
Detailed design, location of and access to project components, construction planning and management	Encroachment into protected areas, ecologically sensitive zones, natural habitats or physical cultural resources	No trees will be cut to install either rooftop or ground mounted solar systems; if required some trimming of trees will be permitted to minimize shading of rooftop solar with island council permission Rooftop solar will only be installed on mosques with the prior agreement of the Imam Ground mounted PV installation in Thoddoo will be done only on land classified as modified habitat (agricultural) Grid connection cable works will be done only along the existing island roads No vegetation will be cleared and no trees will be cut to install cables in the existing roads Cable routes to avoid the area beneath tree crowns (zone for root protection) especially for mature trees.	No project sites encroach into protected areas, ecologically sensitive zones, natural habitats or physical cultural resources No clearance of vegetation and trees within the project footprint contrary to national regulations and other than as documented in the IEE	FENEKA – rooftop Ground mounted - contractor to reflect in contact costs	FENEKA – rooftop Contractor – ground mounted Contractor to prepare detailed design; PMU to review with support of PMC to confirm all EMP measures adequately incorporated	E&S team of PMU with support PMC	Pre-construction stage; compliance prior to approval of detailed design and any works commencing on site including site establishment
	Disturbance to residential area	Rooftop PV will be done on buildings only with the prior agreement of their owner Ground mounted PV installation in Thoddoo will be done on the land owned by the island council away from the residential areas to minimize the disturbance Routing of cables along existing roads to avoid the damage to existing buildings and structures, public utilities, street furniture etc.	PMU approved detailed designs minimize impacts and risks on EHS during subsequent stages of the project	FENEKA – rooftop Ground mounted - contractor to reflect in contact costs	FENEKA – rooftop Contractor – ground mounted Contractor to prepare detailed design; PMU to review with support of PMC to confirm all EMP measures adequately incorporated	E&S team of PMU with support PMC	Pre-construction stage; compliance prior to approval of detailed design and any works commencing on site including site establishment
	Solar PV design results in EHS impacts such as glint and glare	Selection of an environmentally safe and sound solar photovoltaic panel from a manufacturer who offers a facility for return of end-of-life solar PV equipment. Solar panels installed must not contain hazardous materials e.g., cadmium, lead, or selenium. Equipment purchased for use on the project is to be accompanied by letter from the manufacturer stating its composition and the leaching potential of any heavy metal content to determine if it is acceptable and how it is to be disposed on at end-of-life. Solar panels to have an anti-reflective coating to minimize glint and glare and maximize light absorption, tables/racks to be anti-reflective made of galvanized steel or aluminium. Detailed design to minimize visual impact and clutter, orientation is to avoid glint/glare. For islands with airports consult with the aviation authority regarding concern from glint/glare of solar panel and take on board any recommendations made.	PMU approved detailed designs minimize impacts and risks on EHS during subsequent stages of the project	FENEKA – rooftop Ground mounted - contractor to reflect in contact costs	FENEKA – rooftop Contractor – ground mounted Contractor to prepare detailed design; PMU to review with support of PMC to confirm all EMP measures adequately incorporated	E&S team of PMU with support PMC	Pre-construction stage; compliance prior to approval of detailed design

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
		Provide visual warning signs to include the ISO 7010 "Hazard Type: Electrical Symbol" warning of risk of electrocution for electrical equipment in houses for rooftop solar and around the ground mounted solar power plant. On all individual items of electrical equipment provide written and visual warning signs to include the ISO 7010 "Hazard Type: Electrical Symbol" warning of risk of electrocution, high-risk equipment to be kept within a secure, locked cabinet. Detailed design to include lightening protection. Detailed design of ground mounted solar is to include for rainwater harvesting for solar photovoltaic panel cleaning. Foundations and racking system will be designed to withstand earthquakes and powerful cyclones and hurricanes, which will limit the probability of generation unavailability as well as reducing any potential hazard of PV panels being lifted and blown onto adjacent properties.					
	Ground mounted solar PV design results in EHS impacts such as ponding of water	To facilitate use of the space beneath the ground mounted solar power plant, allow the growth of vegetation and protect from flood, solar PV modules to be positioned on a pagoda with cabling suitably protected. To facilitate removal mass concrete foundations are not to be used, pre-cast concrete foundation blocks will make land restoration easier. Detailed designs of ground mounted solar will keep new impermeable surfaces to a minimum since the project site form part of a natural groundwater recharge zone. Foundations to be constructed in such a way as to be adequately drained to prevent washout. Ensure maximum sound power level of equipment at 1 m is 85 dBA, if these noise levels will be exceeded OHS noise warning signage identifying the ear protection to be worn must be installed.	PMU approved detailed designs minimize impacts and risks on EHS during subsequent stages of the project	Ground mounted - contractor to reflect in contact costs	Contractor – ground mounted Contractor to prepare detailed design; PMU to review with support of PMC to confirm all EMP measures adequately incorporated	E&S team of PMU with support PMC	Pre-construction stage; compliance prior to approval of detailed design
O&M of ground mounted solar followed by decommissioning at end of life	General impacts and risk on project affected persons, including O&M workers and local communities	Develop in conjunction with FENEKA an O&M Plan for the ground mounted solar setting out the schedule of inspections, maintenance required, and all EHS measures to be followed during any maintenance works. O&M Plan to be informed by a facilitated risk assessment and include a health and safety Plan and an Emergency Response and Preparedness Plan in relation to the PV operation Develop in conjunction with FENEKA a Decommissioning Plan for the works setting out how the solar PV panels will be removed and the associated EHS measures.	O&M and Decommissioning Plan included in handover to FENEKA to minimize impacts and risks on EHS during subsequent stages of the project	Ground mounted - contractor to reflect in contact costs	Contractor – ground mounted	E&S team of PMU with support PMC	Pre-construction stage; compliance prior to handover to FENEKA
B. Construction							
Site establishment and site clearance	Clearance/trimming of trees and vegetative cover during site establishment	Comply with project EMP plus approved CEMP and ECOP during construction works. Clearance of ground level vegetation only in the project footprint that will be marked out by the contractor under the supervision of the ecologist of PMC. Removal of only those trees for which permission has been granted by the island council – trees to be marked and a record of number of trees, species and size to be kept Remove and dispose of any identified invasive plant species in an ecologically sound manner, imported materials must be free of invasive plant material.	Compliance with national biodiversity regulations and achievement of no net loss biodiversity. EMP/CEMP requirements successfully implemented as determined through regular site checks, photographic record etc.	FENEKA – rooftop Ground mounted - contractor to reflect in contact costs	FENEKA – rooftop Contractor – ground mounted	E&S team of PMU with support PMC	Prepare during pre-construction and comply throughout construction stage

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
		<p>Encroachment outside the marked working area must be avoided, all site clearance is to be strictly controlled and supervised by PMC ecologist to ensure there is minimum loss of and no unnecessary removal of trees and vegetation. Trees and vegetation to be cleared outside the bird breeding season and all trees to be checked by PMC ecologist for nesting birds or bats prior to being cut – if present adults and the young must be allowed to leave the nest beforehand, as confirmed by the PMC ecologist.</p> <p>In addition to compensatory plantation, transplanting of any trees to be cut within the island if it is possible and planting of additional trees (enhancements) in coordination with the Island Council.</p> <p>Use of herbicides or burning to clear vegetation or burning of vegetation trimmings is strictly prohibited, leaves will be mulched and wood will be given to the island council.</p> <p>Separately strip and store topsoil and reinstate it after construction completed.</p> <p>Prior to earthworks and excavation, area will be checked by the PMC ecologist for any signs of burrows etc. If there is a risk of being occupied, then only the manual digging under the close supervision of the PMC ecologist will be permitted.</p> <p>Excavated pits will be robustly fenced or covered to prevent fauna accidentally falling in, further an escape ramp will be provided to allow their escape.</p> <p>Keep written record, supported by photographs, of any animal casualties, including a cause of death if known.</p> <p>Contractors to undertake regular, compulsory wildlife conservation awareness raising activities for all workers related to prohibitions with respect to fishing etc. including toolbox talks and posting of information and warning signs at construction site offices, overnight accommodation, regular inspections of the overnight accommodation, and, strict the disciplinary procedures for any contravention by the workers.</p> <p>Revegetate any disturbed areas not taken up by the project infrastructure to at least original condition through revegetation using native species seeds sourced from the site.</p>	No outstanding biodiversity grievances from local communities or other interested stakeholders.				
Disposal and management of solar panels	Impacts from inappropriately disposed defunct solar panels during installation	Any solar photovoltaic panels that are rejected during installation and commissioning due to damage or failure will immediately be removed from the site and returned to the supplier per O&M requirements	<p>100% of PV panels disposed of by the supplier, none remaining on site for disposal</p> <p>Compliance with national laws and regulations and any guidelines developed by MOECCT.</p> <p>EMP requirements successfully implemented as determined through regular site checks, photographic record etc.</p>	FENEKA – rooftop Ground mounted - contractor to reflect in contact costs	FENEKA – rooftop Contractor – ground mounted	E&S team of PMU with support PMC	Prepare during pre-construction and comply throughout construction stage
C. Operation and Maintenance							
O&M	General impacts and risk of solar PV panels on project affected persons, including FENEKA O&M workers and local communities	Implement the agreed O&M Plan During maintenance activities mitigation measures applicable to the construction stage are also applicable to FENEKA maintenance workers or contractors and are to be followed, including strict prohibitions on workers. Prohibit the use of herbicides, pesticides or burning to control any vegetation growth or to manage vegetation waste.	<p>Project infrastructure maintained in working order and is always in good condition.</p> <p>Compliance with national laws and regulations.</p>	FENEKA O&M	FENEKA	FENEKA supported by E&S team of PMU and the PMC for	Prepare during pre-construction and comply throughout O&M stage

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
		Water to be used for washing of the solar panels will ideally be taken from rainwater or if available the island council supply and no new groundwater source must be tapped. Only water is to be used to clean solar photovoltaic panels, no detergent or other chemicals are to be utilized. Consider use of “dry” cleaning methods to reduce water consumption. Maintain a logbook of ground water abstracted or Island Council water used. If bird droppings are soiling panels increase the frequency of washing them. Regular visual and technical inspection of condition and maintenance as required to be carried out, keep photographic records and log of all inspections, including register of faulty equipment found, and actions taken in response. Electrical equipment and electric wiring to be checked for safe current and voltage ratings. Maintain noise generating project equipment to ensure noise to be limited to the following as 1-hour LAeq: (i) 70 dB(A) at the site boundary; (ii) at residential properties, 55 (day) and 45 (night) dB(A) Ensure all liquids (fuel, oil, or chemicals) are stored in an undercover area with impermeable floor with spill containment bund of 110% capacity under lock and key. Label all drums and containers with their content and potential risk signs (e.g., flammable, corrosive, toxic, etc.) and always keep spill prevention equipment available on site. Display material data sheets for any fuels, oil, or chemicals used on site. Keep spill prevention equipment available on site if fuel, oil and chemical kept.	EMP/O&M Plan successfully implemented by FENEKA as determined through regular site checks, photographic record etc. No outstanding O&M related grievances from local communities or other stakeholders			duration of project	
Health and Safety	General occupational and community health and safety risks of solar PV panels operations	Implement the agreed O&M Plan Ensure all O&M staff have received appropriate OHS trainings for their role. Always keep the operational area neat and tidy. Store equipment in a dedicated, covered, labelled storage area (materials, tools, equipment, and any spare parts). Remove any trip hazards on the ground, e.g., open channels, materials, equipment, trash laying around. Visually inspect for any standing water on site, and when identified, remove, or provide appropriate drainage to remove in timely manner; ensure drainage system is not blocked and fully operational. Monitor closely in case of any extreme weather events and be ready to act immediately. Carry out periodic safety related awareness raising in local communities regarding living with and/or working in proximity to solar PV installations, including but not limited to, electrocution risks.	Compliance with national laws and regulations. EMP successfully implemented by FENEKA as determined through regular site checks, photographic record etc. Zero project-related health and safety accidents reported during O&M No outstanding O&M related grievances	FENEKA O&M Cost	FENEKA	FENEKA	Prepare during pre-construction and comply throughout O&M stage
Disposal and management of solar panels	Impacts from inappropriately disposed defunct solar panels during installation	Use solar panels according to given guidelines to maximize their lifetime and reduce the need for disposal. Define an environmentally safe and sound solar photovoltaic panel handing arrangement, with appropriate handling, storage, and recycling or disposal process for end-of-life equipment. Any solar photovoltaic panels that are rejected due to damage or failure will immediately be removed from the site for disposal by the FENEKA preferred option. FENEKA to establish agreements for disposal of PV panels; if no such agreement in place disposal will be in accordance with the manufacturer’s instructions and in the first instance should be returned to the manufacturer if still in operation after 25 years. If not, disposal must be by a certified industrial	100% of defunct solar panels disposed of by FENEKA, none remaining on site for disposal Compliance with national laws and regulations and any guidelines developed by MOECCT. EMP successfully implemented by FENEKA as determined through regular site checks, photographic record etc.	FENEKA O&M	FENEKA	FENEKA supported by E&S team of PMU and the PMC for duration of project	Prepare during pre-construction and comply throughout O&M stage

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
		waste management company who will need to remove them to suitably licensed waste management facilities based on composition Solar panels must not be disposed of to a non-sanitary landfill or to a sanitary waste landfill if they are classed as hazardous waste. The PV panels that contain heavy metals will not be used since these could constitute hazardous waste.					
D. Decommissioning							
Dismantling PV panels	Impacts from decommissioning works	During decommissioning activities mitigation measures applicable to the construction stage are also applicable to FENEKA decommissioning workers or contractor and are to be followed, including strict prohibitions on workers. Infrastructure decommissioning will include the disconnecting and removal of all electrical equipment, removal of the solar photovoltaic panels and their mounting frames, dismantling of buildings and structures, excavation of concrete foundation pads and backfilling with soil sourced on site or imported. During decommissioning all decommissioned equipment and other wastes will be stored on site prior to disposal. On completion of infrastructure decommissioning restore the project site back to agricultural land, this will involve cleaning site of any debris or wastes, testing soil quality to confirm no residual contamination; left over material and soil/rocks/sand, contaminated soil although this should have been avoided through EMP measures; revegetation of exposed soils using locally native species; reinstatement of natural drainage as required; local topographical adjustments; etc.	Compliance with national laws and regulations. EMP successfully implemented by FENEKA as determined through regular site checks, photographic record etc. No outstanding decommissioning related grievances	FENEKA O&M Cost	FENEKA	FENEKA	Prepare during pre-construction and comply throughout decommissioning stage
	Impacts from inappropriately disposed defunct solar panels during installation	Define an environmentally safe and sound solar photovoltaic panel handing arrangement, with appropriate handling, storage, and recycling or disposal process for end-of-life equipment. FENEKA to establish agreements for disposal of PV panels; if no such agreement in place disposal will be in accordance with the manufacturer's instructions and in the first instance should be returned to the manufacturer if still in operation after 25 years. If not, disposal must be by a certified industrial waste management company who will need to remove them to suitably licensed waste management facilities based on composition Solar panels must not be disposed of to a non-sanitary landfill or to a sanitary waste landfill if they are classed as hazardous waste. The PV panels that contain heavy metals will not be used since these could constitute hazardous waste.	100% of defunct solar panels disposed of by FENEKA, none remaining on site for disposal Compliance with national laws and regulations and any guidelines developed by MOECCT. EMP successfully implemented by FENEKA as determined through regular site checks, photographic record etc.	FENEKA O&M	FENEKA	FENEKA supported by E&S team of PMU and the PMC for duration of project	Prepare during pre-construction and comply in decommissioning

Table 4: Environmental Management Plan for Wind Energy Project
(Also Follow the Environmental Management Plan for grid upgrade)
(To be Implemented in Addition to the Table 1 General Measures and Table 2 re Battery Energy Storage Systems and Cable Works)

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
A. Pre-construction							
Detailed design, location of and access to project components, construction planning and management	General impacts and risk	Once the turbine has be selected, and the layout designed, inform ADB of any changes to the project description and if required update the IEE and EMP for clearance and disclosure by ADB Capacity of the turbines may be increased more than 25kW only if the turbine diameters are small enough, such that more turbines can be placed in the allotted area without inducing wake effects and noise, shadow flicker and set back requirements are met. If a temporary or permanent met mast is identified to be required – solid tower preferred to guyed design – this is to be treated as an unanticipated impact and the IEE and EMP will need to be updated to reflect the impacts of its installation. If piling works are required for foundations this is to be treated as an unanticipated impact and the IEE and EMP will need updating to reflect the impacts especially in relation to noise and vibration and ground water.	No breaches of environmental assessment requirements	Counterpart funding and PMC budget	PMU Contractor to immediately inform PMU if unanticipated impacts identified	E&S team of PMU with support PMC	Prior to the approval of detailed design
	Encroachment into protected areas, ecologically sensitive zones, natural habitats or physical cultural resources Cutting/trimming of trees and removal of vegetative cover	Turbines will be located avoiding beach sites due to this being a natural habitat and increased erosion potential. The proposed site in Manadhoo for wind turbine installations includes an area of land 20m from the coast that must not be cleared of any vegetation. Obtain written clearance from Island Council for the cutting of trees prior to the approval of the detailed design Turbines will be located to the extent possible in locations that support modified habitat and will not require the cutting of trees. Only those trees that are within the footprint of the foundation, crane pad and on-site access tracks will be cleared all other trees and vegetation will be retained. For offsite access no trees to be cut bur trimming of vegetation and trees may be required in consultation with the island council to accommodate abnormal loads. Cable routes to avoid the area beneath tree crowns (zone for root protection) especially for mature trees. Compensatory plantation of 1:2 or 1:4 for coconut palms will be provided on Manadhoo island in advance of site clearance/cutting of trees and will be maintained by the contractor for the entire contractual period to ensure they establish.	No project sites encroach into protected areas, ecologically sensitive zones, natural habitats or physical cultural resources No clearance of vegetation and trees within the project footprint contrary to national regulations and other than as documented in the IEE 100% of trees to be cleared are compensated for in advance of the site clearance/cutting of trees	Contractor to reflect in contact costs	Contractor	E&S team of PMU with support PMC	Prior to the approval of detailed design and any works commencing on site including site establishment
	Impacts to avifauna	The turbine must be selected, and the layout designed, to the extent possible to minimize collision risk to birds and bats – international good practice recommends to keep a 50 m buffer around trees or shrubs into which no part of the turbine will intrude ⁴ Design to avoid artificially creating features in the environment that could attract birds and bats On-site cables are to be buried underground No artificial light sources will be permitted unless mandated by aviation authorities in which case only use of low-intensity red lighting permitted	PMU approved detailed designs minimize impacts and risks on EHS during subsequent stages of the project Project component designed in accordance with IFC EHS Wind Energy guidelines	Contractor to reflect in contact costs	Contractor to prepare detailed design; PMU to review with support of PMC to confirm all EMP measures adequately incorporated	E&S team of PMU with support PMC	Prior to the approval of detailed design

⁴ [Bats and onshore wind turbines \(Interim guidance\) - TIN051 \(naturalengland.org.uk\)](#)

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
	Disturbance to residential area	<p>The proposed site has been selected carefully away from inhabited areas; layout to ensure that wind turbines are no closer to the nearest residential property than that proposed in the IEE, a minimum buffer of 100m is to be adopted.</p> <p>In relation to cumulative impact liaise with other projects regarding the timing and extent of other construction works in the same location and ensure plans for construction works are coordinated so emissions/disruption/ disturbance are minimized.</p>					
	Noise from wind turbines	<p>Quietest available turbines with manufacturer-supplied noise mitigation will be installed.</p> <p>Ensure maximum sound power level of equipment at 1 m is 85 dBA, if these noise levels will be exceeded OHS noise warning signage identifying the ear protection to be worn must be installed.</p> <p>Contractors to ensure that the design of the project components alone enables their operation to always comply with a 1-hour LAeq 70 dB(A) at the site boundary (irrespective of the background noise levels from diesel generators)</p> <p>In the absence of baseline noise data to conduct a wind turbine noise assessment the turbine must be selected, and the layout designed, to achieve 35dB at 10m/s wind speed at 10m height as LA90 at the nearest residential receiver without shut down being required (a turbine with reference noise of 61 dB(A) should guarantee that there will be minimal noise but this is subject to confirmation by the contractor)</p> <p>For the powerhouse and FENEKA offices contractor to consult FENEKA over predicted noise occurrence and obtain their written acceptance of the detailed design</p> <p>Contractor to submit a preliminary model noise assessment using recognized international good practice software with the detailed design to demonstrate these levels are met.</p>					
	Shadow flicker -- when the sun passes behind the wind turbine and casts a shadow, as the rotor blades rotate, shadows pass over the same point at a regular frequency causing an effect called shadow flicker, which will cause disturbances to households which fall within the shadow overcast area.	<p>The turbine must be selected, and the layout designed, so shadow flicker at the residential receptors does not to exceed 30 hours per year and 30 minutes per day on the worst affected day, based on a worst-case scenario⁵ -- a turbine with total height of at most 23 m should ensure that shadow flicker is still within the permissible range although this is subject to confirmation by the contractor.</p> <p>Contractor to submit a modelled shadow flicker assessment using recognized international good practice software with the detailed design to demonstrate these levels are met</p> <p>For the powerhouse and FENEKA offices contractor to consult FENEKA over predicted shadow flicker occurrence and obtain their written acceptance of the detailed design</p> <p>For the powerhouse and FENEKA offices (if shadow flicker modelled to occur) contractor to install blinds so that any operators bothered by shadow flicker may close these</p>					

⁵ There is continual sunshine and permanently cloudless skies from sunrise to sunset. There is sufficient wind for continually rotating turbine blades. Rotor is perpendicular to the incident direction of the sunlight. Sun angles less than 3 degrees above the horizon level are disregarded (due to likelihood for vegetation and building screening). Distances between the rotor plane and the tower axis are negligible. Light refraction in the atmosphere is not considered.

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
	Set back and turbine safety	<p>The turbine must be selected and the layout designed to achieve a setback distance of at least 1.5 x turbine height (tower + rotor radius) from all buildings regardless of ownership</p> <p>Contractor to submit details of the distance of each turbine to demonstrate the compliance</p> <p>One building (green roof on aerial photograph) will be removed before construction, this will need to be ensured otherwise it will not be possible for the project to meet a 100m set back requirement (or noise or shadow flicker levels)</p> <p>For the powerhouse and FENEKA offices contractor to consult FENEKA over predicted health and safety risk and obtain their written acceptance of the detailed design</p> <p>If power plant and FENEKA offices are within 100m, or over 3 x turbine height, contractor to facilitate with participation of FENEKA an OHS risk assessment to ensure that the risks are acceptable to them, based on the extent the area within 100m is used by its personnel – to inform this risk assessment the contractor will quantify the risks of turbine and blade failures.</p>					
	Occupational and community health and safety risks to FENEKA staff and public from electrical infrastructure	<p>Lightning protection systems to be installed</p> <p>Equip wind turbines with vibration sensors that can react to any imbalance in the rotor blades and shut down the turbine if necessary</p> <p>Consult with aviation authority and mark blade tips and install low-intensity red lighting at their request</p> <p>Turbines to be subject to independent design verification/certification per IEC 61400-1 and surveillance of manufacturing quality.</p> <p>Foundations will be designed to withstand earthquakes and powerful cyclones and hurricanes.</p> <p>Final surface level of foundations will be at least 1 m above the existing ground level or highest flood level including an allowance for climate change based on the findings of climate change assessment prepared for the Project (whichever is higher)</p> <p>Foundations, crane pads and on-site access tracks to be constructed in such a way to be adequately drained to prevent washout.</p> <p>Detailed designs will keep the length and width of on-site access tracks and new impermeable surfaces to a minimum since the project site forms part of a natural groundwater recharge zone.</p> <p>All electrical hazards will feature written and visual warning signs that meet the IEEE standards to include the ISO 7010 "Hazard Type: Electrical Symbol" warning of the risk of electrocution.</p> <p>Design to prevent access to the turbines:</p> <ul style="list-style-type: none"> Fence and gate the individual turbines to prevent public access to prevent access to turbine towers. Post information boards about public safety hazards and emergency contact information. <p>Design to eliminate or reduce the requirement to work at height during construction and O&M phases</p> <p>Working at height systems are to be fitted</p> <p>If working at height cannot be eliminated measures to prevent falls to be incorporated into the design – fall protection systems to take priority over use of all arrest systems</p>					

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
	Disturbance to telecoms systems	Layout of turbines to avoid direct physical interference of point-to-point communication systems; consult operators to establish the location of telecommunication links and relevant buffers to be applied to minimize impacts					
	Visual impact of wind turbines	Minimize visual impact and clutter in locating the above ground equipment The layout must maintain a uniform size and design e.g., type of turbine and tower as well as height Turbines to be painted with a matt, non-reflective finish, in off-white or grey color, color and any blade tip markings to be agreed in consultation with Island Council and aviation authorities Selected turbine and its layout must be agreed in consultation with the Island Council before approval of the detailed design					
Construction planning and management	Construction impacts on the marine environment	Given the proximity of the marine environment a construction method statement to be prepared for each individual turbine specifically stating the measures to be undertaken at that location to minimize impacts on the marine environment, especially in relation to risks of increased turbidity due to sediment run off and windblown wastes For those turbines with earthworks and excavations for foundations within 20m of the marine environment or with no vegetation or buildings separating the works site from it, contractor will install cut off ditches or use sediment fences to guard against the loss of soil from surface water runoff.	PMU approved CEMP minimize impacts and risks on EHS during subsequent stages of the project Copy of approved method statements included in the EMR	Contractor to reflect in contact costs	Contractor to prepare; PMU to review with support of PMC to confirm all EMP measures adequately incorporated	E&S team of PMU with support PMC	Pre-construction stage; compliance prior to approval of detailed design and any works commencing on site including site establishment
	Groundwater impacts of construction	Contractor will use gravity-based foundations to install the wind turbines; any different foundation construction method will require the IEE and EMP to be updated. Depth to groundwater needs to be confirmed by ground investigation pre-construction to confirm that foundation depth does not impact on the ground water lens and that pumping of water ingress from the foundations is not required.					
	Noise and vibration impacts of construction	Contractor will use gravity-based foundations to install the wind turbines; any different foundation construction method will require the IEE and EMP to be updated. Temporary acoustic noise barrier to be installed to reduce noise levels by a further 10dB(A) around construction activities and/or the site boundaries. Construction method statement to be prepared for each individual turbine specifically stating the measures to be undertaken at that location to minimize noise and vibration impact, in preparing this the contractor will undertake a quantified noise assessment of their construction method to determine if the project noise standards can be met and the mitigation measures required to ensure it. For private property or public utilities/street furniture that may be damaged by construction vibration (buildings, roads, drains etc.) photographic and/or structural pre-condition surveys are to be completed and agreed with MOECCT prior to any works, including site establishment. To be documented in a pre-project condition report, which will serve as baseline in case any inadvertent damage or vibration impact to property occurs. If risk of structural damage to adjacent properties from vibration identified due to current condition, consider alternative construction methods or temporary relocation of occupants during works if at risk.					

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
	Construction health and safety	<p>Health and safety risk assessment and planning to specifically address working at height and lifting operations and works adjacent to the water with reference to international good practice guidelines.</p> <p>Notably:</p> <p>Ensure all employees working at height are trained and competent in the use of all working-at height and rescue systems in place with safety harnesses provided, regularly inspected to ensure in good condition and worn at all times whilst working at height.</p> <p>Provide workers with a suitable work-positioning device; also ensure the connectors on positioning systems are compatible with the tower components to which they are attached.</p> <p>Ensure that hoisting equipment is properly rated and maintained and that hoist operators are properly trained.</p> <p>When working at height, all tools and equipment should be fitted with a lanyard, where possible, and capture netting should be used if practicable.</p> <p>Signs and other obstructions should be removed from poles or structures prior to undertaking work.</p> <p>An approved tool bag should be used for raising or lowering tools or materials to workers on elevated structures.</p> <p>Avoid conducting tower installation or maintenance work during poor weather conditions and especially where there is a risk of lightning strikes.</p> <p>Ensure all relevant information is known about the load, e.g., the size, weight, method of slinging, and attachment points.</p> <p>Ensure all lifting equipment (including load attachment points) is suitable, capable of supporting the load, in good condition, and in receipt of any statutory inspections required.</p> <p>Ensure all supervisors, equipment operators, and slingers are trained and competent in the lifting equipment and intended lifting techniques.</p> <p>Where possible, exclusion zones are to be established and maintained to prevent any unauthorized access to lifting areas.</p> <p>When lifting large loads, ensure weather conditions are favorable for the task.</p> <p>Heavy lifting equipment typically has safe operating parameters included in its operating manual and these parameters should not be exceeded at any time.</p> <p>Method statement for the lifts to be approved by MOECCT and include: the details of the lift, the roles of each party involved in the lift, and the methods used to communicate instructions among the parties. Health and safety supervisors to be at site and continuously monitor the heavy lifts. Heavy components must be handled carefully without any hastening</p> <p>All equipment must be checked to ensure to be in working order before installation.</p> <p>Health and safety plan to include for an emergency rescue plan detailing the methods to be used to rescue operatives should they become stranded or incapacitated while at height.</p>	PMU approved CEMP and CHSMP minimize impacts and risks on EHS during subsequent stages of the project	Contractor to reflect in contact costs	Contractor to prepare; PMU to review with support of PMC to confirm all EMP measures adequately incorporated	E&S team of PMU with support PMC	Pre-construction stage; compliance prior to approval of detailed design and any works commencing on site including site establishment
	Transportation of oversized or heavy wind turbine components (blades, turbine tower sections, nacelle, and transformers) and cranes	<p>Conduct logistics, traffic, and transportation study to assess loading capacity and other constraints and thus the impacts on existing offsite wharfs/jetties, access roads, culverts, turning radii, and public utilities, turbine designs are to be selected so that it can be accommodated without any upgrades.</p> <p>Schedule deliveries in consultation with Island Council outside of peak hours for harbor and road users to reduce delays.</p> <p>Only use approved access routes, provide traffic management to stop other traffic where needed (for example, at pinch-point locations) and provide flag persons and security escorts where required. Additionally, the oversized</p>	PMU approved CEMP and CHSMP minimize impacts and risks on EHS during subsequent stages of the project	Contractor to reflect in contact costs	Contractor to prepare; PMU to review with support of PMC to confirm all EMP measures adequately incorporated	E&S team of PMU with support PMC	Pre-construction stage; compliance prior to approval of detailed design and any works commencing on site including site establishment

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
		vehicles not to be driven on the public roads for any other purpose than transportation of the wind turbine equipment. For private property or public utilities/street furniture that may be damaged during transportation (buildings, roads, drains etc.) photographic and/or structural pre-condition surveys are to be completed and agreed with MOECCT prior to any works, including site establishment. To be documented in a pre-project condition report, which will serve as baseline in case any inadvertent damage or vibration impact to property occurs. If risk of structural damage to adjacent properties from vibration identified due to current condition, consider alternative construction methods or temporary relocation of occupants during works if at risk.					
O&M	General impacts and risk on project affected persons, including O&M workers and local communities	Develop in conjunction with FENEKA an O&M Plan for the wind turbines setting out the schedule of inspections, maintenance required, and all EHS measures to be followed during any maintenance works. O&M Plan to be informed by a facilitated risk assessment and include a health and safety Plan and an Emergency Response and Preparedness Plan in relation to the wind turbine operation. Develop in conjunction with FENEKA a Decommissioning Plan for the works setting out how the solar PV panels will be removed and the associated EHS measures.	O&M Plan included in handover to FENEKA to minimize impacts and risks on EHS during subsequent stages of the project	Contractor to reflect in contact costs	Contractor	E&S team of PMU with support PMC	Pre-construction stage; compliance prior to commissioning and then on handover to FENEKA
B. Construction							
Site establishment and site clearance	Clearance/trimming of trees and vegetative cover during site establishment	Comply with project EMP plus approved CEMP and ECOP during construction works. Clearance of ground level vegetation only in the project footprint that will be marked out by the contractor under the supervision of the ecologist of PMC. Removal of only those trees for which permission has been granted by the island council – trees to be marked and a record of number of trees, species and size to be kept Remove and dispose of any identified invasive plant species in an ecologically sound manner, imported materials must be free of invasive plant material. Encroachment outside the marked working area must be avoided, all site clearance is to be strictly controlled and supervised by PMC ecologist to ensure there is minimum loss of and no unnecessary removal of trees and vegetation. Trees and vegetation to be cleared outside the bird breeding season and all trees to be checked by PMC ecologist for nesting birds or bats prior to being cut – if present adults and the young must be allowed to leave the nest beforehand, as confirmed by the PMC ecologist. In addition to compensatory plantation, transplanting of any trees to be cut within the island if it is possible and planting of additional trees (enhancements) in coordination with the Island Council. Use of herbicides or burning to clear vegetation or burning of vegetation trimmings is strictly prohibited, leaves will be mulched and wood will be given to the island council. Separately strip and store topsoil and reinstate it after construction completed. Prior to earthworks and excavation, area will be checked by the PMC ecologist for any signs of burrows etc. If there is a risk of being occupied, then only the manual digging under the close supervision of the PMC ecologist will be permitted. Excavated pits will be robustly fenced or covered to prevent fauna accidentally falling in, further an escape ramp will be provided to allow their escape.	Compliance with national biodiversity regulations and achievement of no net loss biodiversity. EMP/CEMP requirements successfully implemented as determined through regular site checks, photographic record etc. No outstanding biodiversity grievances from local communities or other interested stakeholders.	To be included contract cost.	Contractor	E&S team of PMU with support PMC	Prepare during pre-construction and comply throughout construction stage

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
		Keep written record, supported by photographs, of any animal casualties, including a cause of death if known. Contractors to undertake regular, compulsory wildlife conservation awareness raising activities for all workers related to prohibitions with respect to fishing etc. including toolbox talks and posting of information and warning signs at construction site offices, overnight accommodation, regular inspections of the overnight accommodation, and, strict the disciplinary procedures for any contravention by the workers. Revegetate any disturbed areas not taken up by the project infrastructure to at least original condition through revegetation using native species seeds sourced from the site. Plant the disturbed area with shrubs and small growing trees that will not affect the wind turbine operations. Once the works are over, the area around foundation base will be seeded to allow its revegetation but access tracks and crane pads will remain in case required for future O&M.					
Noisy construction work	Disturbance to fauna using adjacent forest and coastal vegetation	Due to forest and coastal vegetation adjacent noisy works only permitted from one hour after sunrise to one hour before sunset to minimize its disturbance	EMP/ECOP/ CHSMP requirements successfully implemented as determined through regular site checks, photographic record etc. No outstanding biodiversity grievances from local communities or other interested stakeholders.	To be included contract cost.	Contractor	E&S team of PMU with support PMC	Prepare during pre-construction and comply throughout construction stage
	Disturbance to residential areas	Earthworks, excavations and foundation installation to be carried out under the full-time supervision of the environment specialist of PMU to ensure measures set out in the agreed construction method statement for each turbine are being followed. Project noise standards as 1hr LAeq to be complied with duration of noisy works reduced to minimize the duration of exposure of occupants of adjacent properties to high noise levels within a given hour and day but with LAmax to be 75dBA. Eurocode 3 standards for vibration to be met during earthworks, excavations and foundation installation. No piling or drilling to install infrastructure will be conducted.	EMP/ECOP/ CHSMP requirements successfully implemented as determined through regular site checks, photographic record etc. No outstanding noise and vibration grievances from local communities or other stakeholders	To be included contract cost.	Contractor	E&S team of PMU with support PMC	Prepare during pre-construction and comply throughout construction stage
Works in proximity to the marine environment	Earthworks and excavations resulting in impact on the marine environment, due to sediment increasing turbidity etc.	Beach will be fenced off to ensure that there will be no accidental encroachment by construction workers Installation of turbines with earthworks and excavations for foundations within 20m of the marine environment or with no vegetation or buildings separating the works site from it, under the full-time supervision of the environment specialist of PMU to ensure measures set out in the agreed construction method statement for each turbine are followed Materials and equipment will be stored away from the coast with no materials permitted to be stored on the beach Do not permit the discharge or disposal of any material to the marine environment, anything that accidentally falls into the sea to be reclaimed No harmful materials will be released to the marine environment.	EMP/ECOP/ CHSMP requirements successfully implemented as determined through regular site checks, photographic record etc. No outstanding marine pollution grievances from local communities or other stakeholders	To be included contract cost.	Contractor	E&S team of PMU with support PMC	Prepare during pre-construction and comply throughout construction stage
Mobilization and transportation of materials	Impact on Manadhoo island harbor facility during loading and	Prior notice will be given to all harbor users of loading and unloading schedule Weather conditions must be studied before docking at the harbor and journeys must only be undertaken in the favorable conditions.	EMP/CEMP requirements successfully implemented as determined through regular site checks, photographic record etc.	To be included contract cost.	Contractor	E&S team of PMU with support PMC	Prepare during pre-construction and comply throughout

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
	unloading of materials and equipment	Fenders to be placed along the barge before attempting to moor alongside the quay wall.	No outstanding access related grievances from local communities or other stakeholders				construction stage
C. Operation and Maintenance							
O&M	General impacts and risk of wind turbines on project affected persons, including FENEKA O&M workers and local communities	<p>Implement the agreed O&M Plan.</p> <p>During maintenance activities mitigation measures applicable to the construction stage are also applicable to FENEKA maintenance workers or contractors and are to be followed, including strict prohibitions on workers.</p> <p>Prohibit the use of herbicides, pesticides or burning to control any vegetation growth or to manage vegetation waste.</p> <p>Regular visual and technical inspection of condition and maintenance as required to be carried out, keep photographic records and log of all inspections, including register of faulty equipment found, and actions taken in response.</p> <p>Electrical equipment and electric wiring to be checked for safe current and voltage ratings.</p> <p>Maintain noise generating project equipment to ensure noise to be limited to the following as 1-hour LAeq: (i) 70 dB(A) at the site boundary; (ii) at residential properties, 55 (day) and 45 (night) dB(A)</p> <p>Ensure all liquids (fuel, oil, or chemicals) are stored in an undercover area with impermeable floor with spill containment bund of 110% capacity under lock and key.</p> <p>Label all drums and containers with their content and potential risk signs (e.g., flammable, corrosive, toxic, etc.) and always keep spill prevention equipment available on site.</p> <p>Display material data sheets for any fuels, oil, or chemicals used on site.</p> <p>Keep spill prevention equipment available on site if fuel, oil and chemical kept.</p>	<p>Project infrastructure maintained in working order and is always in good condition.</p> <p>Compliance with national laws and regulations.</p> <p>EMP/O&M Plan successfully implemented by contractor for pilot phase and then FENEKA as determined through regular site checks, photographic record etc.</p> <p>No outstanding O&M related grievances from local communities or other stakeholders</p>	To be included contract cost for first year of O&M. FENEKA O&M following handover	Contractor and FENEKA	E&S team of PMU with support PMC for first year of O&M FENEKA following handover	Prepare during pre-construction and comply throughout O&M
	General occupational and community health and safety risks of wind turbine operations	<p>Implement the agreed O&M Plan</p> <p>Ensure all O&M staff have received appropriate OHS trainings for their role.</p> <p>Major maintenance will require external assistance from the wind turbine servicing team of the wind turbine supplier, FENEKA will need to establish a service agreement with the supplier at the end of 3 years once the pilot period is over.</p> <p>Always keep the operational area neat and tidy. Store equipment in a dedicated, covered, labelled storage area (materials, tools, equipment, and any spare parts). Remove any trip hazards on the ground, e.g., open channels, materials, equipment, trash laying around.</p> <p>Lightning protection and other safety systems to be maintained.</p> <p>Carry out periodic blade inspections and repair any defects that could affect blade integrity.</p> <p>Visually inspect for any standing water on site, and when identified, remove, or provide appropriate drainage to remove in timely manner; ensure drainage system is not blocked and fully operational.</p> <p>Ensure a recent, full, first aid kit and adequate firefighting equipment is always available on site, stored in clearly labelled and easily accessible area. Replace the first aid equipment timely as required to keep all equipment within its expiry date.</p> <p>Service the firefighting equipment timely as required to keep all equipment in date.</p> <p>Provide first aid and firefighting training to select, volunteer staff in relation to the wind turbines; at least one staff having recently carried out first aid and</p>	<p>Compliance with national laws and regulations.</p> <p>EMP successfully implemented by contractor for pilot phase and then FENEKA as determined through regular site checks, photographic record etc.</p> <p>Zero project-related health and safety accidents reported during O&M</p> <p>No outstanding O&M related grievances</p>	To be included contract cost for first year of O&M. FENEKA O&M following handover	Contractor and FENEKA	E&S team of PMU with support PMC for first year of O&M FENEKA following handover	Prepare during pre-construction and comply throughout O&M

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
		firefighting training must be always present on site. Refreshers are to be provided once a year. Hang posters showing first aid procedures especially for electrocution, and fire procedures, as well as listing all emergency contacts. Display the emergency phone number and location of first aider, doctor, health center and hospital in a clear and easily accessible location. Keep an accident log and make accident logbook available on site upon request. Monitor closely in case of extreme weather events and be ready to act immediately. Ensure turbines are structurally sound if any earthquake occurs, check turbine soundness prior to allowing workers back on site. Maintain the good condition of turbine fences and regularly check the security fences for any gaps and repair to prevent any unauthorized public access and trespass. Keep boundary gates and doors to turbines always locked (except when workers are in-coming or exiting) but at times when the gate or door has been unlocked, ensure one staff is always present to control any unauthorized entry. Carry out periodic safety related awareness raising in local communities regarding living in proximity to wind turbines, including but not limited to, minimizing activity in the area adjacent to turbines and electrocution risks.					
Unanticipated impacts of wind turbine operation	Impact on birdlife	Keep a record of any bird and bat mortality and if occurring during the first year of operation take adaptive measures such as shut down during migratory periods when more birds may be present or low wind speeds when bats at higher risk, in the event significant impacts are observed that cannot be resolved the wind turbines to be decommissioned after the pilot period. Free spinning of rotors under low wind conditions when the wind turbines are not generating power is not permitted	EMP successfully implemented by contractor for pilot phase as determined through regular site checks, photographic record etc. No outstanding O&M avifauna impacts or their related grievances	To be included contract cost for first year of O&M.	Contractor	E&S team of PMU with support PMC for first year of O&M	Prepare during pre-construction and comply throughout first year of O&M
	Shadow flicker.	Shadow flicker complaints from the community to be noted with the GRM record kept at the powerhouse facility. If the issue is persistent on any location during the first year of operation, assist in blocking the window using blinds etc. Or if not a desirable outcome, then turbine operation may need to be curtailed during the period of occurrence through installation of shadow flicker modules. In the event significant impacts are observed that cannot be resolved the wind turbines to be decommissioned after the pilot period.	EMP successfully implemented by contractor for pilot phase as determined through regular site checks, photographic record etc. No outstanding O&M shadow flicker impacts or their related grievances	To be included contract cost for first year of O&M.	Contractor	E&S team of PMU with support PMC for first year of O&M	Prepare during pre-construction and comply throughout first year of O&M
	Noise from wind turbines.	Noise complaints from the community to be noted with the GRM record kept at the powerhouse facility. Nighttime noise pollution, and related complaints from residences should be monitored especially vigilantly. If the issue is persistent on any location during the first year of operation, the turbines may need to be curtailed during nighttime, certain wind speeds etc. FENEKA may also to consider to provide additional noise insulation to residential properties. In the event significant impacts are observed that cannot be resolved the wind turbines to be decommissioned after the pilot period.	EMP successfully implemented by contractor for pilot phase as determined through regular site checks, photographic record etc. No outstanding O&M noise related impacts or their related grievances	To be included contract cost for first year of O&M.	Contractor	E&S team of PMU with support PMC for first year of O&M	Prepare during pre-construction and comply throughout first year of O&M
	General	If during the first year of pilot O&M any other unanticipated impacts are observed to occur, then adaptive management will be taken and the turbines will either be curtailed (shut down) during problematic wind speeds or decommissioned	EMP successfully implemented by contractor for pilot phase as determined through regular site checks, photographic record etc.	To be included contract cost for first year of O&M.	Contractor	E&S team of PMU with support PMC for first year of O&M	Prepare during pre-construction and comply throughout O&M

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
			No outstanding O&M related impacts or their related grievances				
D. Decommissioning							
Dismantling wind turbines	Impacts from decommissioning works	<p>During decommissioning activities mitigation measures applicable to the construction stage are also applicable to the contractor (if at end of pilot phase) or FENEKA decommissioning workers or contractor and are to be followed, including strict prohibitions on workers.</p> <p>Infrastructure decommissioning will include the disconnecting and removal of all electrical equipment, removal of the wind turbines in full, dismantling of buildings and structures, excavation of concrete foundations and backfilling with soil sourced on site or imported, cutting off foundations to a sufficient distance below ground level so as not to restrict future land use, the removal of crane pads and access tracks etc.</p> <p>During decommissioning all decommissioned equipment and other wastes will be stored on site prior to disposal.</p> <p>On completion of infrastructure decommissioning restore the project site back to agricultural land, this will involve cleaning site of any debris or wastes, testing soil quality to confirm no residual contamination; left over material and soil/rocks/sand, contaminated soil although this should have been avoided through EMP measures; revegetation of exposed soils using locally native species; reinstatement of natural drainage as required; local topographical adjustments; etc.</p>	<p>Compliance with national laws and regulations.</p> <p>EMP successfully implemented by contractor or FENEKA as determined through regular site checks, photographic record etc.</p> <p>No outstanding decommissioning related grievances</p>	Contingency for decommissioning at end of first year of O&M in case pilot is not successful to be included in contract cost. Otherwise FENEKA O&M Cost if decommissioned at the end of life	Contractor if decommissioned at end of first year of O&M, otherwise FENEKA	E&S team of PMU with support PMC if decommissioned at end of first year of O&M, otherwise FENEKA	Prepare during pre-construction and comply throughout decommissioning stage

Table 53: Environmental Management Plan for Ocean Energy Pilot System
(To be Implemented in Addition to the Table 1 General Measures)

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
A. Pre-construction							
Feasibility study on location of and access to project components	General impacts and risks	<p>Develop the feasibility study and detailed design of the pilot following the requirements of the marine BAP</p> <p>Once the feasibility study is completed and the design and location of the ocean energy pilot has been determined, update the IEE and EMP for clearance and disclosure by ADB</p> <p>Further elaboration of the mitigation and monitoring measures in the updated IEE and EMP must ensure no net loss of critical habitat, and if appropriate, offsets will need to be proposed by MOECCT that would preferably lead to net gains.</p> <p>Presence of no marine-based physical cultural resources beneath the footprint of the ocean energy pilot is to be reconfirmed in updating the IEE for the selected location.</p>	No breaches of environmental assessment requirements	Counterpart funding and PMC budget	PMU Contractor to immediately inform PMU if unanticipated impacts identified	E&S team of PMU with support PMC	Prior to the approval of feasibility study and then detailed design

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
Feasibility study and detailed design – survey works	Impacts on the marine environment	Undertake detailed bathymetric surveys and hydrodynamic measurements around each of the islands where deployment may be undertaken to inform the feasible sites Install any ADCP buoys required for data collection under the supervision of the PMC marine ecologist, do not disturb any coral or sea grass (or other sensitive areas) habitat in placing buoys; also no anchoring on the reef flat or reef slope permitted Ensure buoy mooring lines are installed and maintained tautly to avoid entanglement of marine fauna Buoys and other survey equipment should not be imported by sea but constructed locally to avoid wet tow of materials that may have been subject to biofouling – if previously used in the marine environment elsewhere they must be thoroughly cleaned off site under the supervision of a marine ecologist (due to the risk of invasive species) Local support boats will be used for surveys, they will be well maintained and operated (MAPROL 73/78) and driven by experienced boat handlers to avoid pollution, health and safety incident No anchoring of support boats in areas of coral or sea grass (or other sensitive areas) Number of vessel movements to be kept to minimum Keep boat speeds low to avoid collision with marine fauna in working area and shallow water navigation routes (<5 knots for sea turtles) Do not permit the discharge or disposal of any material to the marine environment, anything that accidentally falls into the sea to be reclaimed	Compliance with national biodiversity regulations and achievement of no net loss biodiversity. EMP and mBAP requirements successfully implemented as determined through regular site checks, photographic record etc. No outstanding biodiversity grievances from local communities or other interested stakeholders.	Contract cost	Contractor	E&S team of PMU with support PMC	During conduct of marine surveys and prior to the approval of feasibility study and then detailed design
Feasibility study and detailed design – ecology surveys	Impacts on the marine environment	Undertake marine water quality samples per the EPA ‘EIA Data Collection Guidelines’ Undertake marine ecology surveys to a scope of work agreed with ADB (see attached example) and in line with those undertaken for marine floating solar associated facilities and including benthic habitat in anchor locations and any future cable route Undertake consultation regarding presence of whale shark, reef manta ray – including identification of cleaning sites around Muli Island, ornate eagle ray, and hawksbill turtle with relevant experts in the Maldives as per the ocean energy marine ecology impact assessment and take on board their views in determining the feasible sites – if areas are found to be of importance for critical habitat species, then deployment should not occur in their vicinity	PMU approved detailed designs minimize impacts and risks on EHS during subsequent stages of the project Ocean energy pilot designed and constructed in compliance with ADB natural and critical habitat requirements	Contract cost	Contractor	E&S team of PMU with support PMC	Prior to the approval of feasibility study and then detailed design

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
Feasibility study and detailed design – detailed design and construction planning and management	Impacts on the marine environment	<p>Design bottom clearance of ocean energy turbines to be greatest between either 25% of the vertical water column depth or 5 m</p> <p>Design to maximize light penetration below the floating structure</p> <p>Cumulative impact of land reclamation and the new bridge around the islands of Mathikomandoo and Komandoo to be taken into account in determining the feasible sites</p> <p>Feasibility study to identify the preferred sites with most potential for a successful pilot to minimize the number of sites that the ocean energy equipment is to be deployed at</p> <p>Selected sites must avoid damage to coral and sea grass from placement of anchors; reef flat and reef slope must not be used for installation</p> <p>The configuration of the turbines and moorings is to be carefully done to minimize impacts on movements of marine mammals and reptiles.</p> <p>Smallest number of devices possible to achieve 100 kW should be installed to reduce the potential for marine impacts</p> <p>Devices to be selected that have the slowest frequency of rotation and/ or smallest feasible rotor size to minimize the potential for injury that may ensue from any impact with blades</p> <p>Potential for locating energy devices in deeper water may be preferred to minimize the percentage of the water column within the rotor swept area, but this should only occur if these areas are not of greater sensitivity for species that may be at risk from collision.</p> <p>Devices will be designed to ensure containment of any harmful materials arising from leaks or machinery failure.</p> <p>Pollution prevention plan must include procedures in the event of a marine pollution incident with booms for containment of a fuel or oil spill available on the support boat, and the waste management plan to address waste management at sea as well as on the land</p> <p>During the pilot phase cables will not be connected to shore</p> <p>In locating the feasible sites the impact of any future cable must be taken into account, in terms of technical feasibility and ecological impact with coral and sea grass (or other sensitive areas) to be avoided</p>	<p>PMU approved detailed designs and CEMP minimize impacts and risks on EHS during subsequent stages of the project</p> <p>Ocean energy pilot designed and constructed in compliance with ADB natural and critical habitat requirements</p>	Contract cost	Contractor	E&S team of PMU with support PMC	Prior to the approval of feasibility study and then detailed design and CEMP for ocean energy pilot
	Impacts on marine users, health and safety risks	<p>Consult with fishers, marine tourism and other marine users and take on board their concerns and recommendations</p> <p>Detailed design to include for navigation warning signage and lighting – only low intensity red lighting will be used to mark</p> <p>All electrical hazards will feature written and visual warning signs that meet the IEEE standards to include the ISO 7010 "Hazard Type: Electrical Symbol" warning of the risk of electrocution.</p>					

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
		<p>Selected turbine and its layout must be agreed in consultation with the Island Council before approval of the detailed design</p> <p>Undertake consultation with the Island Council to agree the extent of the required exclusion zone around the ocean energy installation to ensure community health and safety</p> <p>Anchors will be designed to withstand powerful cyclones and hurricanes, which will limit the potential hazard of the ocean energy equipment being lifted and blown onto the shore or out to sea.</p> <p>Health and safety risk assessment and planning to specifically address working over water with reference to international good practice guidelines.</p> <p>Health and safety plan to include for an emergency rescue plan detailing the methods to be used to rescue operatives should they fall overboard etc.</p> <p>Schedule installation in consultation with Island Council outside of peak hours for harbor to reduce delays.</p>					
O&M	General impacts and risk on project affected persons, including O&M workers and local communities	<p>Develop in conjunction with FENEKA an O&M Plan for the ocean energy pilot setting out the schedule of inspections, maintenance required, and all EHS measures to be followed during any maintenance works. O&M Plan to be informed by a facilitated risk assessment and include a health and safety Plan and an Emergency Response and Preparedness Plan in relation to the wind turbine operation.</p> <p>Develop in conjunction with FENEKA a Decommissioning Plan for the works setting out how the ocean energy will be removed and the associated EHS measures.</p>	O&M Plan included in handover to FENEKA if they wish to retain as permanent to minimize impacts and risks on EHS during subsequent stages of the project	Contractor to reflect in contact costs	Contractor	E&S team of PMU with support PMC	Pre-construction stage; compliance prior to commissioning and then on handover to FENEKA if to be retained as a permanent installation
B. Construction							
Installation of ocean energy pilot	Impacts on the marine environment	<p>Comply with project EMP and mBAP plus approved CEMP and ECOP during construction works.</p> <p>Materials for the ocean energy equipment will be stored on the wharf/harbor side with no materials permitted to be stored on the beach</p> <p>Install the ocean energy equipment under the supervision of the PMC marine ecologist, do not disturb any coral or sea grass (or other sensitive areas) in placing anchors; also no anchoring on reef flat or reef slope permitted</p> <p>Installation will only be carried out during the daytime from one hour after sunrise to one hour before sunset; no artificial lighting will be utilized during construction</p> <p>PMC marine ecologist to supervise installation and visually for the presence of monitor sensitive marine fauna, if observed in buffer zone installation must be temporarily halted to avoid risks of vessel strikes etc.</p> <p>Ocean energy equipment must not be imported by sea but constructed locally to avoid wet tow of materials that may have been subject to biofouling – if previously used in the marine environment elsewhere they must be thoroughly</p>	EMP/mBAP/CEMP requirements successfully implemented as determined through regular site checks, photographic record etc.	To be included contract cost.	Contractor	E&S team of PMU with support PMC	Prepare during pre-construction and comply throughout construction stage

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
		<p>cleaned off site under the supervision of a marine ecologist (due to the risk of invasive species)</p> <p>Ensure anchor lines are installed and maintained tautly to avoid entanglement of marine fauna</p> <p>Local support boats will be used for installation, boats will be well maintained and operated (MAPROL 73/78) and driven by experienced boat handlers to avoid pollution, health and safety incident</p> <p>No anchoring of support boats in areas of coral or sea grass (or other sensitive areas)</p> <p>Number of vessel movements to be kept to minimum</p> <p>Keep boat speeds low to avoid collision with marine fauna in working area and shallow water navigation routes (<5 knots for sea turtles)</p> <p>Do not permit the discharge or disposal of any material to the marine environment, anything that accidentally falls into the sea to be reclaimed</p> <p>Deploy the ocean energy pilot outside of the seasonal monsoon periods when whale shark or reef manta ray may be present around islands (i.e., outside of the southwest monsoon around the islands of Muli and Mulah and NE monsoon around Komandoo Island).</p> <p>No harmful materials will be released to the marine environment.</p> <p>No piling or drilling to install infrastructure will be conducted.</p>					
C. Operation and Maintenance							
O&M	General impacts and risk of ocean energy pilot on project affected persons, including FENEKA O&M workers and local communities	<p>Implement the agreed O&M Plan.</p> <p>During maintenance activities mitigation measures applicable to the construction stage are also applicable to FENEKA maintenance workers or contractors and are to be followed, including strict prohibitions on workers. Regular visual and technical inspection of condition and maintenance as required to be carried out, keep photographic records and log of all inspections, including register of faulty equipment found, and actions taken in response.</p> <p>Electrical equipment and electric wiring to be checked for safe current and voltage ratings.</p> <p>Ensure all liquids (fuel, oil, or chemicals) are stored in an undercover area with impermeable floor with spill containment bund of 110% capacity under lock and key.</p> <p>Label all drums and containers with their content and potential risk signs (e.g., flammable, corrosive, toxic, etc.) and always keep spill prevention equipment available on site.</p> <p>Display material data sheets for any fuels, oil, or chemicals used on site.</p> <p>Keep spill prevention equipment available on site if fuel, oil and chemical kept.</p>	<p>Project infrastructure maintained in working order and is always in good condition.</p> <p>Compliance with national laws and regulations.</p> <p>EMP/O&M Plan successfully implemented by contractor for pilot phase and then FENEKA if retained as permanent as determined through regular site checks, photographic record etc.</p> <p>No outstanding O&M related grievances from local communities or other stakeholders</p>	To be included contract cost for first year of O&M. FENEKA O&M following handover if retained as permanent	Contractor and FENEKA	E&S team of PMU with support PMC for first year of O&M FENEKA following handover if retained as permanent	Prepare during pre-construction and comply throughout O&M
	Impacts on the marine environment	<p>Comply with project EMP and mBAP during O&M</p> <p>Do not permit the discharge or disposal of any material to the marine environment, anything that accidentally falls into the sea to be reclaimed</p> <p>No harmful materials will be released to the marine environment.</p> <p>All equipment used to be maintained regularly in accordance with the manufacturer's recommendations to help reduce the potential for accidental discharges.</p> <p>In the event of a marine fauna injury or fatality turbine operation will be immediately halted</p>	<p>Compliance with national laws and regulations.</p> <p>EMP/mBAP successfully implemented by contractor for pilot phase and then FENEKA as determined through regular site checks, photographic record etc.</p>	To be included contract cost for first year of O&M. FENEKA O&M following handover	Contractor and FENEKA	E&S team of PMU with support PMC for first year of O&M FENEKA following handover	Prepare during pre-construction and comply throughout O&M

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
			No net loss to the population viability of critical habitat species occurs				
	General occupational and community health and safety risks of ocean energy pilot	Implement the agreed O&M Plan Ensure all O&M staff have received appropriate OHS trainings for their role. Ensure a recent, full, first aid kit and adequate firefighting equipment is always available on site, stored in clearly labelled and easily accessible area. Replace the first aid equipment timely as required to keep all equipment within its expiry date. Service the firefighting equipment timely as required to keep all equipment in date. Provide first aid and firefighting training to select, volunteer staff in relation to the ocean energy pilot; at least one staff having recently carried out first aid and firefighting training must be always present on site. Refreshers are to be provided once a year. Hang posters showing first aid procedures especially for electrocution, and fire procedures, as well as listing all emergency contacts. Display the emergency phone number and location of first aider, doctor, health center and hospital in a clear and easily accessible location. Keep an accident log and make accident logbook available on site upon request. Monitor closely in case of extreme weather events and be ready to act immediately. Carry out periodic safety related awareness raising in local communities focused on fishers and other boat users as well as those conducting marine tourism regarding undertaking activities in proximity to ocean energy pilot.	Compliance with national laws and regulations. EMP successfully implemented by contractor for pilot phase and then FENEKA as determined through regular site checks, photographic record etc. Zero project-related health and safety accidents reported during O&M No outstanding O&M related grievances	To be included contract cost for first year of O&M. FENEKA O&M following handover	Contractor and FENEKA	E&S team of PMU with support PMC for first year of O&M FENEKA following handover	Prepare during pre-construction and comply throughout O&M
Unanticipated impacts of ocean energy pilot operation	Impacts to marine ecology	If during the pilot O&M unanticipated impacts are observed to occur on marine ecology then adaptive management will be taken, this may include alteration to blade rotation velocities, alternation of blade size, or decommissioning at that location and deployment to a location of lower sensitivity. If a site is found not to be technically or ecologically or socially feasible after deployment or after the 12 months of pilot the ocean energy equipment will be removed from site	EMP successfully implemented by contractor for pilot phase as determined through regular site checks, photographic record etc. No outstanding O&M related impacts or their related grievances No net loss to the population viability of critical habitat species occurs	To be included contract cost for first year of O&M.	Contractor	E&S team of PMU with support PMC for first year of O&M	Prepare during pre-construction and comply throughout O&M
D. Decommissioning							
Dismantling of the ocean energy pilot	Impacts from decommissioning works	During decommissioning activities mitigation measures applicable to the construction stage are also applicable to the contractor (if at end of pilot phase) or FENEKA decommissioning workers or contractor and are to be followed, including strict prohibitions on workers. Infrastructure decommissioning will include the disconnecting and removal of all electrical equipment, removal of the ocean energy pilot in full, removal of ground anchors etc. Decommissioned equipment must be handed over to Government or Maldives or disposed of off-island by the contractor	Compliance with national laws and regulations. EMP successfully implemented by contractor or FENEKA as determined through regular site checks, photographic record etc. No outstanding decommissioning related grievances	Contingency for decommissioning at end of first year of O&M in case pilot is not successful to be included in contract cost. Otherwise	Contractor if decommissioned at end of first year of O&M, otherwise FENEKA	E&S team of PMU with support PMC if decommissioned at end of first year of O&M, otherwise FENEKA	Prepare during pre-construction and comply throughout decommissioning stage

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
	Impacts on the marine environment	Decommission the ocean energy pilot following the requirements of the EMP and marine BAP Removal will include taking out the anchors so that natural restoration can take place	EMP/mBAP successfully implemented by contractor or FENEKA as determined through regular site checks, photographic record etc. No outstanding decommissioning related grievances No net loss to the population viability of critical habitat species occurs	FENEKA O&M Cost if decommissioned at the end of life			
Retention of ocean energy pilot if successful	Impacts on the marine environment	It will only be permitted to retain the ocean energy equipment as a permanent installation if environmental clearance for doing so is first obtained from the EPA, following assessment and the development of an EMP for O&M as a permanent facility	EPA clearance obtained if ocean energy pilot is to be retained	MOECCT cost (not in project scope)	MOECCT	MOECCT	Prior to completion of 12-month operational period

Table 6: Environmental Management Plan for Agricultural Intervention
(Also follow the Environmental Management Plan for grid upgrade and ground mounted solar)
(To be Implemented in Addition to the Table 1 General Measures)

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
A. Pre-construction							
Feasibility study	General impacts and risks	Once the feasibility study is completed and the design and location of the agricultural intervention has been determined, update the IEE and EMP for clearance and disclosure by ADB	No breaches of environmental assessment requirements	Counterpart funding and PMC budget	PMU Contractor to immediately inform PMU if unanticipated impacts identified	E&S team of PMU with support PMC	Prior to the approval of feasibility study
Feasibility and detailed design, location of and access to project components, construction planning and management	Encroachment into protected areas, ecologically sensitive zones, natural habitats or physical cultural resources	Shade houses and cold stores will only be located on modified habitat Ecology survey to be conducted as part of the feasibility survey No vegetation will be cleared and no trees will be cut to install the agricultural interventions	No project sites encroach into protected areas, ecologically sensitive zones, natural habitats or physical cultural resources No clearance of vegetation and trees within the project footprint	Contractor to reflect in contact costs	Contractor	E&S team of PMU with support PMC	Pre-construction stage; compliance prior to approval of detailed design and any works commencing on site including site establishment
	Use of water for irrigation depleting groundwater Impacts of cold storage chilling units	No additional water will be abstracted in relation to installing the irrigation system, no new water source will be developed. Cold store refrigeration equipment will not use any toxic chemicals or ozone depleting chemicals and be specified to have a noise level of <70dB(A) at 1m distance Cold storage refrigeration will need to comply with the Maldives HCFC reduction polies, and hence refrigerant such as R-22 (CHCIF2 with 0.047 ozone depleting potential) must not be used. The project must ensure refrigerants such as R-71747 (ammonia, toxic and corrosive, can cause explosion/fire, but it is not ozone	PMU approved feasibility and detailed design minimize impacts and risks on EHS during subsequent stages of the project				

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
		depleting) will also not be used with only normal cooling water discharged and no chemicals or other impurities will be let out through the drain. Support for the cultivation of betel nut will be excluded from the scope of the agricultural intervention as although legal it is addictive and carcinogenic					
O&M of agricultural interventions	General impacts and risk on project affected persons, including O&M workers and local communities	Develop in conjunction with Island Council an O&M Plan for the agricultural interventions setting out the schedule of inspections, maintenance required, and all EHS measures to be followed during any maintenance works. O&M Plan to be informed by a facilitated risk assessment and include a health and safety plan and an Emergency Response and Preparedness Plan in relation to the operation	O&M Plan included in handover to Island Council to minimize impacts and risks on EHS during subsequent stages of the project	Contractor to reflect in contact costs	Contractor	E&S team of PMU with support PMC	Pre-construction stage; compliance prior to handover to FENEKA
B. Construction							
Site establishment and site clearance	Clearance/trimming of trees and vegetative cover during site establishment	<p>Comply with project EMP plus approved CEMP and ECOP during construction works.</p> <p>Clearance of ground level vegetation only in the project footprint that will be marked out by the contractor under the supervision of the ecologist of PMC.</p> <p>Removal of only those trees for which permission has been granted by the island council – trees to be marked and a record of number of trees, species and size to be kept</p> <p>Remove and dispose of any identified invasive plant species in an ecologically sound manner, imported materials must be free of invasive plant material.</p> <p>Encroachment outside the marked working area must be avoided, all site clearance is to be strictly controlled and supervised by PMC ecologist to ensure there is minimum loss of and no unnecessary removal of trees and vegetation.</p> <p>Trees and vegetation to be cleared outside the bird breeding season and all trees to be checked by PMC ecologist for nesting birds or bats prior to being cut – if present adults and the young must be allowed to leave the nest beforehand, as confirmed by the PMC ecologist.</p> <p>In addition to compensatory plantation, transplanting of any trees to be cut within the island if it is possible and planting of additional trees (enhancements) in coordination with the Island Council.</p> <p>Use of herbicides or burning to clear vegetation or burning of vegetation trimmings is strictly prohibited, leaves will be mulched and wood will be given to the island council.</p> <p>Separately strip and store topsoil and reinstate it after construction completed.</p> <p>Prior to earthworks and excavation, area will be checked by the PMC ecologist for any signs of burrows etc. If there is a risk of being occupied, then only the manual digging under the close supervision of the PMC ecologist will be permitted.</p> <p>Excavated pits will be robustly fenced or covered to prevent fauna accidentally falling in, further an escape ramp will be provided to allow their escape.</p> <p>Keep written record, supported by photographs, of any animal casualties, including a cause of death if known.</p> <p>Contractors to undertake regular, compulsory wildlife conservation awareness raising activities for all workers related to prohibitions with respect to fishing etc. including toolbox talks and posting of information and warning signs at construction site offices, overnight accommodation, regular inspections of the overnight accommodation, and, strict the disciplinary procedures for any contravention by the workers.</p>	<p>Compliance with national biodiversity regulations and achievement of no net loss biodiversity.</p> <p>EMP/CEMP requirements successfully implemented as determined through regular site checks, photographic record etc.</p> <p>No outstanding biodiversity grievances from local communities or other interested stakeholders.</p>	To be included contract cost.	Contractor	E&S team of PMU with support PMC	Prepare during pre-construction and comply throughout construction stage

Topic	Impact or Risk	Mitigation Measure	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility	Implementation schedule
		Revegetate any disturbed areas not taken up by the project infrastructure to at least original condition through revegetation using native species seeds sourced from the site.					
C. Operation and Maintenance							
O&M	General impacts and risk of agricultural interventions on project affected persons, including Island Council O&M workers and local communities	Implement the agreed O&M Plan During maintenance activities mitigation measures applicable to the construction stage are also applicable to Island Council maintenance workers or contractors and are to be followed, including strict prohibitions on workers. Prohibit the use of herbicides, pesticides or burning to control any vegetation growth or to manage vegetation waste. Regular visual and technical inspection of condition and maintenance as required to be carried out, keep photographic records and log of all inspections, including register of faulty equipment found, and actions taken in response. Electrical equipment and electric wiring to be checked for safe current and voltage ratings. Maintain noise generating project equipment to ensure noise to be limited to the following as 1-hour LAeq: (i) 70 dB(A) at the site boundary; (ii) at residential properties, 55 (day) and 45 (night) dB(A) Ensure all liquids (fuel, oil, or chemicals) are stored in an undercover area with impermeable floor with spill containment bund of 110% capacity under lock and key. Label all drums and containers with their content and potential risk signs (e.g., flammable, corrosive, toxic, etc.) and always keep spill prevention equipment available on site. Display material data sheets for any fuels, oil, or chemicals used on site. Keep spill prevention equipment available on site if fuel, oil and chemical kept.	Project infrastructure maintained in working order and is always in good condition. Compliance with national laws and regulations. EMP/O&M Plan successfully implemented by Island Council as determined through regular site checks, photographic record etc. No outstanding O&M related grievances from local communities or other stakeholders	Island Council cost	Island Council	Island Council	Prepare during pre-construction and comply throughout O&M stage
Health and Safety	General occupational and community health and safety risks of agricultural interventions	Implement the agreed O&M Plan Ensure all O&M staff have received appropriate OHS trainings for their role. Always keep the operational area neat and tidy. Store equipment in a dedicated, covered, labelled storage area (materials, tools, equipment, and any spare parts). Remove any trip hazards on the ground, e.g., open channels, materials, equipment, trash laying around. Monitor closely in case of extreme weather events and be ready to act immediately. Carry out periodic safety related awareness raising in local communities especially focused towards the farmers who will benefit regarding agricultural interventions.	Compliance with national laws and regulations. EMP successfully implemented by Island Council as determined through regular site checks, photographic record etc. Zero project-related health and safety accidents reported during O&M No outstanding O&M related grievances	Island Council cost	Island Council	Island Council	Prepare during pre-construction and comply throughout O&M stage

Table 7: Quantitative Environmental Monitoring Plan

Project Component/ Environmental Features	Aspect to be Monitored	Time and Frequency of Monitoring	Location	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility
Preconstruction Stage							
Grid Upgrade/Air Quality	24hr air quality at boundary of powerhouse PM10 and PM2.5 to be measured as 24hrs period along with meteorological data-temperature, humidity, solar speed, and solar direction Measurement professional, calibrated monitoring devices by accredited service provider (record full 24-hour data)	Prior to commencement of works (dry season)	Project Site	EMP compliance; baseline establishment	Contractor Cost	Contractor	E&S team of PMU supported by PMC
Grid Upgrade/Noise	24hr noise levels at boundary of power house LAeq 1hr, LAeq day 7am-10pm, and LAeq night 10pm-7am, LAmax, LAmin over 24hrs period Measurement professional, calibrated monitoring devices by accredited service provider (record full 24-hour data)	Prior to commencement of works	Project Site	EMP compliance; baseline establishment	Contractor Cost	Contractor	E&S team of PMU supported by PMC
Wind Energy/Noise	24hr noise levels at nearest residential receptor and boundary of powerhouse LAeq 1hr, LAeq day 7am-10pm, and LAeq night 10pm-7am, LAmax, LAmin over 24hrs period Measurement professional, calibrated monitoring devices by accredited service provider (record full 24-hour data) Note: this will not constitute a noise monitoring study per IFC EHS Guidelines on Wind Energy for purposes of allowing turbine noise >35dBA	Prior to commencement of works	Project Site	EMP compliance; baseline establishment	Contractor Cost	Contractor	E&S team of PMU supported by PMC
Ocean Energy/Water Quality	Marine water quality per EPA guidelines Water sample is to be taken in a clean, non-contaminated, well-sealed container and tested within the next 48h by accredited laboratory	Prior to commencement of works	Project Site	EMP compliance; baseline establishment	Contractor Cost	Contractor	E&S team of PMU supported by PMC
Wind Energy/Ecology	Terrestrial ecology survey Detailed survey/inventory of the number, location, size, and species of trees and shrubs to be cut based on detailed design as well as details of ground vegetation to be cleared Detailed survey/inventory of the status of compensatory tree plantation to be conducted in the pre-construction phase of work	Prior to and to inform detailed design	Project Site	EMP compliance; baseline establishment	Contractor Cost	Contractor	E&S team of PMU supported by PMC
Ocean Energy/Ecology	Marine ecology survey during feasibility study to scope to be agreed with ADB (to be in line with scope undertaken for floating solar as reference for costing purposes-see attached draft TOR	Prior to and to inform detailed design	Project Site	EMP compliance; baseline establishment	Contractor Cost	Contractor	E&S team of PMU supported by PMC
Ground Mounted Solar and Agricultural Intervention/ Ecology	Terrestrial ecology survey	Prior to and to inform detailed design	Project Site	EMP compliance; baseline establishment	Contractor Cost	Contractor	E&S team of PMU supported by PMC
Construction stage							
All terrestrial components except rooftop solar/soil	Keep records of earthworks involved, including total volume in cubic meters of soil excavated and reused (any disposed of as spoil off site to waste disposal facilities recorded as per waste generation)	Ongoing with monthly progress report	Project Site	EMP compliance; all excavated material and cut, and fill volume accounted for, either reused on-site or disposed of off-site to licensed waste disposal facilities	Contractor Cost	Contractor	E&S team of PMU supported by PMC

Project Component/ Environmental Features	Aspect to be Monitored	Time and Frequency of Monitoring	Location	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility
All terrestrial components except rooftop solar/water	Keep records of all water abstracted/used and source	Ongoing with monthly progress report	Project Site	EMP compliance; No grievance received regarding conflict with other water users	Contractor Cost	Contractor	E&S team of PMU supported by PMC
All/pollution incidents	Keep records of all pollution incidents (e.g., type of material spilled, amount in kg or cubic meters, and action taken to clean up) Carry out visual inspection and interviews with workers and the affected communities to identify if any unrecorded incidents occurred	Ongoing with monthly progress report	Project Site	EMP compliance; zero major incidents occurred. Minor incidents responded to in accordance with EMP with lessons learnt for future.	Contractor Cost	Contractor	E&S team of PMU supported by PMC
All/materials used and waste generated	Keep records of all types of materials used and wastes produced by type, volume/weight. Document waste disposal through transfer notes including type, volume/ weight, transport provider, intermediaries if any and final treatment or disposal facility (with copy of its license and its capacity)	Ongoing with monthly progress report	Project Site	EMP compliance; Transfer of 100% of construction wastes documented, and all wastes disposed of in an environmentally safe and sound manner in accordance with IFC General EHS Guidelines	Contractor Cost	Contractor	E&S team of PMU supported by PMC
All/health and safety	Keep records of near miss, minor, lost time, and fatal health and safety incidents related to the project, compile records from construction site Carry out interviews with workers and affected communities to identify if any unrecorded incidents occurred. During the COVID-19 pandemic, temperature checks to be carried out at entrance of the work site at start of shift	Ongoing with monthly progress report	Project Site	Zero lost time incidents or fatalities (among workers and affected communities) For 100% lost time incidents or fatalities /confirmed COVID-19 cases immediate action taken to avoid repeat or escalation of situation. All incidents including minor and near miss dealt with in accordance with EMP with lessons learnt for future 100% lost time and fatalities/confirmed COVID-19 cases reported to MOECCT within 24 hours and ADB within 48 hours	Contractor Cost	Contractor	E&S team of PMU supported by PMC
All/Employment	Keep records of employment generated, age/gender/sex-disaggregated employment data, home locations, and trainings received	Ongoing with monthly progress report	Project Site	EMP compliance	Contractor Cost	Contractor	E&S team of PMU supported by PMC
Grid Upgrade/Air Quality	24hr air quality at boundary of powerhouse PM10 and PM2.5 to be measured as 24hrs period along with meteorological data-temperature, humidity, solar speed, and solar direction Measurement professional, calibrated monitoring devices by accredited service provider (record full 24-hour data)	Only if complaints raised from local residents about dust during construction On completion of works before handing over grid upgrade to FENEKA (dry season)	Project Site	EMP compliance; project air quality levels met at receptors or no deterioration compared to the baseline	Contractor Cost	Contractor	E&S team of PMU supported by PMC
Grid Upgrade/Noise	24hr noise levels at boundary of power house LAeq 1hr, LAeq day 7am-10pm, and LAeq night 10pm-7am, LMax, LAmin over 24hrs period Measurement professional, calibrated monitoring devices by accredited service provider (record full 24-hour data)	Only if complaints raised from local residents about noise during construction On completion of works before handing over grid upgrade to FENEKA	Project Site	EMP compliance; project noise levels met at receptors or no deterioration compared to the baseline	Contractor Cost	Contractor	E&S team of PMU supported by PMC

Project Component/ Environmental Features	Aspect to be Monitored	Time and Frequency of Monitoring	Location	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility
Wind Energy/Noise	24hr noise levels at nearest residential receptor LAeq 1hr, LAeq day 7am-10pm, and LAeq night 10pm-7am, LAmax, LAmin over 24hrs period Measurement professional, calibrated monitoring devices by accredited service provider (record full 24-hour data)	Monthly during construction for general construction, daily for undertaking of any piling works On completion of works before handing over pilot project to FENEKA	Project Site and Receptors	EMP compliance; project noise levels met at receptors or no deterioration compared to the baseline	Contractor Cost	Contractor	E&S team of PMU supported by PMC
	Noise compliance testing to verify the modelled noise levels	On completion of works before handing over pilot project to FENEKA					
All/Groundwater Sources	EPA/WHO drinking water standards; all basic health parameters to be tested for to confirm not being polluted due to the construction. Water sample is to be taken in a clean, non-contaminated, well-sealed container and tested within the next 48 hours by external laboratory	Only if complaints raised from local residents about pollution of ground water sources	Project Site	EPA/WHO drinking water standards	Contractor Cost	Contractor	E&S team of PMU supported by PMC
All/Drinking Water Quality	EPA/WHO drinking water standards; if supplier does not provide records all basic health parameters to be tested for to confirm not being polluted due to the construction and fit for human consumption Water sample is to be taken in a clean, non-contaminated, well-sealed container and tested within the next 48 hours by external laboratory	Monthly during construction	Project Site	EPA/WHO drinking water standards	Contractor Cost	Contractor	E&S team of PMU supported by PMC
Wind Energy/Ecology	Detailed survey/inventory of the success of compensatory tree plantation to be conducted in the pre-construction phase of work	On completion of works before handing over pilot project to FENEKA	Compensatory Plantation Sites	EMP compliance; 100% survival of planted trees or their replacements after one year	Contractor Cost	Contractor	E&S team of PMU supported by PMC
Operation and Maintenance Stage							
Rooftop and ground mounted solar/water	Keep records of all water abstracted/used and source	Ongoing with monthly progress report	Project Site	EMP compliance; No grievance received regarding conflict with other water users	FENEKA	FENEKA	FENEKA supported by E&S team of PMU and the PMC for duration of project
BESS and solar/end of life batteries and solar PV panel waste generated	Keep records of all end of life batteries and solar PV panels produced by type, volume/weight. Document waste disposal through transfer notes including type, volume/ weight, transport provider, intermediaries if any and final treatment or disposal facility (with copy of its license and its capacity)	Ongoing with monthly progress report	Project Site	EMP compliance; Transfer of 100% of batteries and solar PV panel wastes documented, and all wastes disposed of in an environmentally safe and sound manner in accordance with IFC General EHS Guidelines	FENEKA	FENEKA with support of battery supplier where contractual agreement is in place	FENEKA supported by E&S team of PMU and the PMC for duration of project
All/health and safety	Keep records of near miss, minor, lost time, and fatal health and safety incidents related to the project, compile records from construction site Carry out interviews with workers and affected communities to identify if any unrecorded incidents occurred. During the COVID-19 pandemic, temperature checks to be carried out at entrance of the work site at start of shift	Ongoing with monthly progress report	Project Site	Zero lost time incidents or fatalities (among workers and affected communities) For 100% lost time incidents or fatalities /confirmed COVID-19 cases immediate action taken to avoid repeat or escalation of situation.	FENEKA	FENEKA	FENEKA supported by E&S team of PMU and the PMC for duration of project

Project Component/ Environmental Features	Aspect to be Monitored	Time and Frequency of Monitoring	Location	Performance Standard	Budget Source/ Mitigation Cost	Implementation responsibility	Monitoring responsibility
				All incidents including minor and near miss dealt with in accordance with EMP with lessons learnt for future 100% lost time and fatalities/confirmed COVID-19 cases reported to MOECCT within 24 hours and ADB within 48 hours			
Ocean Energy/ Underwater Noise	Underwater sound measurements following guidance set out by Polagye and Bassett (2021) including approaches that seek to differentiate sound produced by the energy device and broader natural and anthropogenic sources	During first year of O&M to inform adaptive management	Project Site	EMP compliance; zero animal casualties occurred	Contractor Cost	Contractor	E&S team of PMU supported by PMC
Ocean Energy/Water Quality	Marine water quality per EPA guidelines Water sample is to be taken in a clean, non-contaminated, well-sealed container and tested within the next 48h by accredited laboratory	During pilot period, first year of O&M	Project Site	EMP compliance; baseline establishment	Contractor Cost	Contractor	E&S team of PMU supported by PMC
Wind Energy/Ecology	Case of avifauna behavior change, injury or mortality from project facilities – vantage point and carcass research survey per methodology to be agreed with ADB and in line with the EHS Guidelines on Wind Energy	During first year of O&M to inform adaptative management	Project Site	EMP compliance; zero animal casualties occurred	Contractor Cost	Contractor	E&S team of PMU supported by PMC
	Keep written record, supported by photographs, of any animal casualties, including a cause of death if known	During O&M	Project Site	EMP compliance; zero animal casualties occurred	Contractor Cost	Contractor	E&S team of PMU supported by PMC
Ocean Energy/Ecology	Case of marine fauna behavior changes, injury or mortality from project facilities following the requirements of the marine BAP – nearfield research survey using video, ground truthing of species presence, measurement of stimuli per methodology to be agreed with ADB, in line with other ocean energy pilot studies implemented globally and as set out in the marine ecology impact assessment (Appendix 9)	During first year of O&M to inform adaptive management	Project Site	EMP compliance; zero animal casualties occurred	Contractor Cost	Contractor	E&S team of PMU supported by PMC
	Keep written record, supported by photographs, of any animal casualties, including a cause of death if known	During O&M	Project Site	EMP compliance; zero animal casualties occurred	Contractor Cost	Contractor	E&S team of PMU supported by PMC
	Marine ecology survey to scope to be agreed with ADB	During pilot period and on decommissioning	Project Site	EMP compliance; no change in habitat, flora or fauna from the baseline situation	Contractor Cost	Contractor	E&S team of PMU supported by PMC
Ground Mounted Solar and Agricultural Intervention/ Ecology	Terrestrial ecology survey	On completion of construction works	Project Site	EMP compliance; comparison to baseline establishment	Contractor Cost	Contractor	E&S team of PMU supported by PMC
Agricultural Intervention – Cold Storage/Hazardous Materials	Service records including replenishment of refrigerant	Ongoing with monthly progress report	Project Site	EMP compliance	Island Council	Island Council	Island Council supported by E&S team of PMU and the PMC for duration of project

SCOPE OF MARINE ECOLOGY SURVEYS FOR OCEAN ENERGY

I. Survey Areas

1. A rapid assessment seabed survey is required to determine the status of seabed habitats beneath the initially proposed ocean energy pilot areas, along potential cable routes to shore, and to provide a broader understanding around sites to inform the site selection process (i.e., avoidance of importance habitats through alternative sighting of turbines). The survey should be completed at two spatial scales at each site as detailed below, as well as at alternative site locations:

- (i) *Baseline ecological survey* shall be carried out to establish marine environmental baseline at the proposed site. Ecological survey also needs to be carried out at a control site which can be used for future monitoring purpose. The survey shall include coral cover, fish, and seagrass.
- (ii) *Seabed condition*. Visual survey of the seabed at proposed site and alternative site need to be undertaken at all islands to examine the condition of the seabed. The visual survey needs to include appearance of the materials of the seabed and any other physical properties which might be an interest when anchoring the ocean energy structures. Representative number of photos of the seabed need to be recorded.
- (iii) *Depth measurements*. The depths beneath the turbine area + 10 meters (m) offset from outside boundary should be measured, in order to allow conclusions on the anchoring and mooring of the ocean energy pilot. Additionally, the seabed depth shall be recorded at each of the sample stations of 1 and 2 to have additional measurement points. At each measured location, the coordinates (WGS84) shall be recorded with the use of a professional handheld GPS/GLONASS device (± 1.5 m spatial differential precision is expected).
- (iv) *Marine seawater quality (seawater hardness and salinity test)*. The marine seawater hardness, conductivity, pH, and salinity should be established at the sites specified.
- (v) *Onsite observations*. While at the site, observations on the general area of the ocean energy pilot and related facilities shall be made, potential sites for construction area identified and the conclusions documented in the site questionnaire provided. This includes information on topography/bathymetry, geology, hydrology, infrastructure, etc. as can be observed while standing at the site.

2. All proposed stations should be mapped as part of the development of a survey plan for review and agreement prior to the survey commencing with a kmz file provided to show the locations.

II. Methods⁶

A. Baseline Ecological Survey

3. Marine survey provides information on the condition of habitats, abundance of the biota and the diversity of the site. To get baseline line transect survey, fish belt transect, and sea-grass survey need to be undertaken.⁷

1. Line Intercept Transects

4. Line intercept transects (LIT) could be used to determine the percentage cover of benthic communities at the project site, alternative sites and control site at each island. The LIT transects need to be 100 m long, divided into four segments, each 19.5 m long. For example, if the first segment start point is 0 m, last point is 19.5m, the next segment will start at 25 m leaving 5 m gap in between to ensure sample independence at finishes at 44.5 m. The benthic categorization shall follow under the Reef Check⁸ protocol, which emphasizes on benthic composition categorizing such as hard corals, sand, rock, and others.

2. Fish Belt Transect

5. This method aims to count (quantify) the abundance and community composition of fish on transect. This is the principle recommended fish method under Global Coral Reef Monitoring Network. Fish belt transect should be done along with LIT. Observers would swim at a constant speed and careful not to count the same fish or group of fish twice as they can move along the transect. Species would be noted on a slate along with the tape, particular station/site name, the name of the data recorder/observer, date, GPS coordinate of start and end point.

3. Seagrass Survey

6. Seagrass survey would be carried out using the methodology derived from Maldives Seagrass Monitoring Network, 2020 and Environmental Protection Agency Data Collection Guideline. Percentage cover would be measured within replicate quadrats placed at regular intervals along the length of a transect.

7. The following procedure could be used for seagrass percentage cover survey:
 - (i) 50 cm x 50 cm quadrats at 10 m regular intervals to estimate the percentage cover,
 - (ii) transects placed perpendicular to the shore and that extend to the outer limits of the beds, (where seagrass disappears), and
 - (iii) take photos of each transect and these photos would be analyzed.
8. The following method could be used for mapping the distribution and density of meadows:
 - (i) Aerial mapping of the meadows could be conducted by using a real-time kinematic drone (please refer for aerial mapping methodology).
 - (ii) Photos taken could be analyzed using a software and combined image into a geographic information system software.
 - (iii) Seagrass meadow boundary could be showed using geographic information system along with the area of distribution.

⁶ If the proposed methodology is not feasible, the consultant can present an alternative methodology—noting that a rapid assessment using video is preferred and a quantified transect/quadrat approach is not needed at this time.

⁷ These methods are from Environmental Protection Agency Data Collection Guideline, Global Coral Reef Monitoring Network and Maldives Seagrass Monitoring Network.

⁸ Reef Check Instruction Manual: A Guide to Reef Check Coral Reef Monitoring

9. Site location, time and date should be recorded for each transect. At each sampling point, GPS coordinates shall be provided to mark the surveyed transect. All videos and photographs should be stored and provided with a map of survey locations as part of the reporting for the survey.

B. Seabed condition

10. The seabed condition of the site could be physically surveyed if the water depth is shallow. Van Veen Grab could be used to take samples from the seabed, if the location has deeper water. The samples need to be photographed and inspected visually.

C. Marine seawater quality

11. The marine seawater shall be sampled and tested at a laboratory for hardness, conductivity, pH, and salinity at the sites.

D. Onsite Observations

12. While at site, the surroundings and shoreline close to the site should be checked and observations noted according to the questionnaire provided. Where information on possible locations is required, a photograph should document the location and the coordinates of the site.

III. Interpretation of data

13. An ecological baseline of the marine environment needs to be established at each site based on the field survey results. The baseline shall provide a current status of the marine habitat, an account of any environmental stress, visual signs of pollution and any other factor that could be important for the establishment of the ocean energy pilot. The rapid data collection should be able to support the analysis and reporting which could include the following indicators:

- (i) Seabed condition—substrate classification
- (ii) Habitat type cover, distribution, and extent (live coral, dead coral, seagrass, and algae)
- (iii) Presence of the *Acropora rudis*, an endangered coral species present in the Maldives
- (iv) The general health of habitats, e.g., for coral this will include bleaching signs, mortality, presence and diversity of associated organisms, and stress factors.

14. From the onshore observations, suggestions on suitable locations for the storage, assembly, launching ramp and operations and maintenance area of the ocean energy pilot should be made. It should further be noted whether the areas near the shore are steep, muddy or otherwise noteworthy, and the width and slope of the shoreline documented (please refer to site visit questionnaire for further details).

A. Ad Hoc Species Documentation

15. During the off-station survey period, the presence of other species in the survey area should be recorded, including seabirds, fishes, sea turtles and marine mammals. The species name, abundance, frequency and approximate location should be recorded, along with the time and date of any records taken.

B. Sea Turtle Nesting Beach Rapid Assessment Survey

16. There is no data available on the potential nesting of sea turtles on sandy beaches that may be present at the proposed ocean energy pilot sites; and coverage of nesting surveys across all potential habitat used for nesting across the Maldives is limited to certain areas. Understanding the potential for nesting is important to determine potential impacts on critical habitat triggers, especially as Endangered green turtle (*Chelonia mydas*) and critically endangered hawksbill turtle (*Eretmochelys imbricata*) are known to nest in the Maldives. Impacts will primarily relate to the potential trenching of cables through intertidal sandy beaches where they are present. To help to understand the potential for sea turtle nesting, a rapid assessment of beaches near to ocean energy pilot sites should be undertaken using the “Sea Turtle Nesting Beach Indicator Tool” that is available here: <https://bluedotassociates.com/rapid-data/>. The tool employs a scoring and rating system to assess Beach Suitability, which is the potential for supporting a viable nesting population based on habitat features; and Human Impacts and how these are affecting nesting beaches (Cousins et al., 2017). The tool provides indicative rather than conclusive results on nesting potential, i.e., indications of poor suitability for certain beaches should not be used as evidence there is no nesting. This rapid assessment can be supported by the local community consultations as outlined below.

C. Informal Local Community Consultation

17. A strategic screening exercise undertaken for the ocean energy pilot islands has determined a number of species that could be present in the seascape that may trigger critical habitat classification. It is unlikely (due to seasonality or frequency of presence or absence) that the surveys proposed above will positively identify these species. Therefore, informal community consultation should be undertaken with local key stakeholders on the islands (e.g., tourism operators, hotel associated marine biologists, fishermen, community members) to determine the potential presence of these species in the site area. There is no need to follow specific interview techniques for this consultation, but consultees should be identified and approached prior to survey; and their responses recorded along with their names, position/occupation, and date met. Any consultee discussions must be supported by photographic representation of key species to confirm identification. Any records of key species (see below) should be marked on a map to confirm that the sightings have been made in the local area.

18. The key species that should be focused upon include:

- (i) Whale shark (*Rhincodon typus*)
- (ii) Ornate eagle ray (*Aetomylaeus vespertilio*)
- (iii) Reef manta ray (*Manta alfredi*)
- (iv) Northern Maldivian little heron (*Butorides striata didii*)
- (v) Presence of green and hawksbill turtles in reef flat areas; and also, to confirm the presence or absence of nesting.

19. In addition, consultations should seek to determine if any ecosystem services activities occur within the intertidal and marine areas at the ocean energy pilot sites, e.g., if fisheries and eco-tourism.

References:

Cousins, N.; Rees, A. F.; Godley, B.J. (2017). Announcement: A Sea Turtle Nesting Beach Indicator Tool to Help Identify Areas with Potential for Sea Turtle Nesting. Marine Turtle Newsletter No. 153, 2017 - Page 13.

Hodgson, G., Hill, J., Kiene, W., Maun, L., Mihaly, J., Liebeler, J., Shuman, C. and Torres, R. Reef Check Instruction Manual: A Guide to Reef Check Coral Reef Monitoring. Reef Check Foundation, Pacific Palisades, California, USA
EPA, (2012), EPA Data Collection Guideline
Maldives Seagrass Monitoring Network Methods, (2020)

ENVIRONMENTAL CODES OF PRACTICE

I. Environment

A. Chance Find Procedures

- (i) If suspected physical cultural resources are encountered, all works at the find site should be immediately halted.
- (ii) The find should be assessed by a competent official of government, and procedures to avoid, minimize or mitigate impacts to such physical cultural objects should then be agreed in writing with them.
- (iii) Work will not begin or resume until the procedures to avoid, minimize, or mitigate impacts to the physical cultural resources have been agreed and implemented in full.
- (iv) If avoidance is not feasible, and no alternatives to removal exist, cost-benefit assessment needs to be carried out to assess whether the project works should continue or stop at site. If the project benefits outweigh the anticipated cultural heritage loss from removal which is unlikely unless in case of resource of local value, following clearance of ADB, the physical cultural resources should be removed and preserved using the best available technique in accordance with relevant provisions of national heritage protection laws and decrees as well as international best archaeological practice.
- (v) Records to be maintained of all finds, including chain of custody instructions for movable finds.

B. Pollution Prevention

1. Air Pollution (Dust)

- (i) Use of modern equipment, exclude over-aged or worn-out equipment or vehicles from the construction site
- (ii) Boats and trucks importing loose raw materials or removing spoil must be covered with tarpaulin to reduce dust generation
- (iii) Position any stationary emission sources (e.g., pumps, diesel generators, compressors, etc.) as far as practical from the nearest properties
- (iv) Impose speed limits on construction vehicles on off- and on-site access roads to minimize exhaust and dust emissions especially where access roads run adjacent to properties
- (v) Prohibit engine idling
- (vi) Stockpiles of spoil and other dust generating materials to be kept to a minimum necessary to undertake works for the day and covered with tarpaulin
- (vii) Minimize double handling and drop loads
- (viii) Cover exposed soil with materials like gravel to minimize re-suspension of dust
- (ix) Sprinkle earthworks, off- and on-site access roads that are not blacktopped, and material stockpiles with water during the construction period to avoid dust being dispersed by wind and mitigate dust related issues due to frequent movement of construction vehicles as necessary i.e., 2-3 times per day but more often if needed during excavations, dry and windy conditions that enable dust to be easily mobilized and the dust to be visible.
- (x) Regularly clean dust from the off-site access roads during and immediately after construction work is completed.
- (xi) Strictly prohibit the burning of wastes generated by project-related activities.

- (xii) Ensure workers working near or having long exposure to vehicle exhausts and earthworks are provided with clean N95 dust masks to avoid inhalation or particulate matter and other pollutants.
- (xiii) Periodic medical respiratory checks to be performed on workers exposed to high dust levels.

2. Noise and Vibration

- (i) Use of modern equipment, exclude over-aged or worn-out equipment or vehicles from the construction site
- (ii) Select construction techniques and low noise generating equipment e.g., less than 55 dBA sound pressure level at 1m, and stage noisy works to limit their duration to minimize noise and vibration
- (iii) Fit all equipment and vehicles used in construction with exhaust silencers where the manufacturer's design allows this
- (iv) Position any stationary emission sources (e.g., pumps, diesel generators, compressors, etc.) as far as practical from the nearest properties
- (v) Prohibit engine idling
- (vi) Prohibit use of horn by construction vehicles
- (vii) Impose speed limits on construction vehicles on off- and on-site access roads to minimize noise emissions especially where access roads run adjacent to properties
- (viii) Provide appropriate PPE (acoustic ear plugs or earphones capable of reducing noise levels to 85 dB(A) for hearing protection) to any workers subjected to noise levels of 85 dBA for more than 8 hours per day and ensure they wear it e.g., if piling etc.
- (ix) No unprotected ear should be exposed to a peak sound pressure level (instantaneous) of more than 140 dB(C) or average maximum sound levels of 110 dB(A).
- (x) Periodic medical hearing checks to be performed on workers exposed to high noise levels of 80 dBA for more than 8 hours per day.

3. Soil and Water Pollution

- (i) Avoid storage of all fuel, oil, and chemicals in areas adjacent to the marine environment, freshwater and wells to avoid direct contamination or contamination through run off
- (ii) Drums, containers or tanks of fuel, oil, or chemicals to be labelled and kept in a designated, labelled storage area under lock and key when not in use
- (iii) Establish dedicated fuel, oil, and chemicals stores (drums/containers/tanks) on impermeable bunded area of 110% volume to avoid spills and leaks contaminating soil and affecting water quality
- (iv) Secondary containment design to also consider means to prevent contact between incompatible materials in the event of a release.
- (v) Place all drums or containers of fuel, oil, or chemicals on drip trays not sited on impermeable surface with 110% bunded capacity.
- (vi) Place all equipment that contains fuel or oil on drip trays it not sited on impermeable surface with 110% bunded capacity.
- (vii) Undertake refilling or refueling only on areas of hard protected soil, preferably bunded, away from the marine environment freshwater and wells with all drainage directed through oil interceptors.

- (viii) Provide drip trays/catch basins or other overflow/drip containment measures at connection points or possible overflow locations during refilling or refueling
- (ix) Use of dripless hose connections for vehicle tanks and fixed connections with storage tanks
- (x) Use dedicated fittings, pipes, and hoses on containers or tanks and regularly inspect their condition
- (xi) Use of refilling or refueling equipment that is compatible and suitable for the characteristics of the materials being transferred and designed to ensure safe transfer
- (xii) Overfills of drums, containers, and tanks to be prevented as they are among the most common causes of leaks and spills resulting in soil and water contamination
- (xiii) Maintain procedures to prevent hazardous materials from being stored in incorrect containers or tanks
- (xiv) Provide spill response kit with sufficient absorbent materials (e.g., sorbents, dry sand, sandbags) on-site for immediately soaking up any fuel, oil, or chemical leaks/spills that do accidentally occur
- (xv) Undertake construction during the dry season to minimize exposed areas subject to erosion by surface water runoff and to avoid flood risk, leading to accidents and/or water contamination.
- (xvi) Deep excavations to be limited to dry season to prevent the need to pump out and dispose of sediment laden water.
- (xvii) Works over or near the marine environment will adopt protection measures to guard against loss of soil that would result in the turbidity of water.
- (xviii) Minimize soil erosion and surface water runoff by reducing the extent of earthworks, revegetating earthworks on completion, and covering stores of sand and spoil with tarpaulin
- (xix) Ensure surface water runoff from the construction site shall not discharge directly to surface water but shall be discharged through sedimentation basin and oil interceptor. Construction of three-stage sedimentation ponds/tanks with an inlet, mid, and outlet section is required to allow sediment to settle out of surface water runoff before release of water. Silt fences can be used to channel surface water runoff to the sedimentation pond/tank. The working volume of the sedimentation pond/tank must be sufficient to allow for a minimum hydraulic retention time of at least 120 minutes under the peak surface water runoff conditions. If runoff rates exceed the capacity of a sedimentation pond/tank, one or more additional sedimentation ponds/tanks will be needed in parallel to accommodate the higher flow rates. Maximum sediment accumulation in the sedimentation pond/tank must be 25% or less.

Figure 1: Sedimentation Pond or Tank Illustrations

Source: Minnesota Storm Water Manual, <https://www.eng.auburn.edu/research/centers/hrc-temp/news/erosion-control.html>, <https://cals.ncsu.edu/crop-and-soil-sciences/extension/training-programs/workshops/erosion-and-sediment-control/>

- (xx) Provision of oil-water separator on all drainage systems
- (xxi) If water from excavations is pumped it must be disposed of via a sedimentation basin, it must not be disposed of directly to the marine environment/freshwater
- (xxii) Do not allow washing of equipment or vehicles in the marine environment/freshwater and ensure all washing water is discharged to sedimentation basin and oil interceptor instead of directly to surface water.
- (xxiii) Provision of designated hard standing areas for equipment servicing, refueling and wash down located away from the marine environment freshwater and wells, with drainage directed through oil and grease interceptors before discharge into a settling pond
- (xxiv) Cement will be stored in enclosed storage facilities and not exposed to the elements.
- (xxv) Do not undertake any concrete mixing adjacent to the marine environment, freshwater and wells
- (xxvi) Strict prohibition on open defecation and urination by construction workers
- (xxvii) Only existing toilets and washing facilities connected to a wastewater treatment plant or septic tank (with soak pit) are to be used (no pit latrines)
- (xxviii) No untreated wastewater is to be discharged direct to surface water or the ground
- (xxix) Spent engine oil from the equipment will be collected and sent for recycling and re-use.

C. Materials and Waste Management

- (i) Import all materials from existing licensed sources and keep records of all materials used, and sources.
- (ii) Storage yards will be fenced using a solid fence to catch windblown material.
- (iii) Minimize waste generation, restrict use of plastics and polyethene and use recyclable/biodegradable materials during construction to the extent possible
- (iv) Use durable, long-lasting materials that will not need to be replaced as often, thereby reducing the amount of construction waste generated over time.
- (v) Purchase perishable construction materials e.g., paints incrementally to reduce spoilage of unused materials.
- (vi) Use building materials that have minimal packaging to avoid generation of excessive packaging waste
- (vii) Use construction materials containing recycled content when possible and in accordance with technical standards
- (viii) Prior to the start of works the contractor will ensure the waste management system is established at the construction sites

- (ix) Separate waste containers (drums, bins, skips or bags) will be provided for different types of waste; prevent the commingling or contact between incompatible wastes and allow for inspection between containers to monitor leaks or spills
- (x) Sensitize workers on good housekeeping and the environmentally sound storage and disposal of construction and wastes, and importantly not to leave garbage lying around.
- (xi) Collect and segregate construction wastes including scrap metal, oil, and solid waste; ensure all workers are familiar with this segregation and arrange garbage bins to collect these wastes so they are not thrown on the floor
- (xii) Clearly identifying (label) and demarcating the waste storage area(s) on a site plan
- (xiii) Store all the wastes produced in an environmentally sound manner in designated, labelled area with separate waste containers (drums, bins, skips or bags) for each distinct type of waste.
- (xiv) Store solid waste in enclosed bins to contain leachate and avoid vermin.
- (xv) Store hazardous waste so as to prevent accidental releases to air, soil, and water resources in closed containers away from direct sunlight and rain
- (xvi) Limiting access to hazardous waste storage areas to workers who have received proper training
- (xvii) Secondary containment systems to be constructed using materials appropriate for the wastes being contained
- (xviii) Provide adequate ventilation where volatile wastes are stored
- (xix) Conducting periodic inspections of waste storage areas and documenting the findings
- (xx) Encourage recovery of recyclable wastes that could be reused or sold to licensed recyclers, rather than disposing of it.
- (xxi) Prohibit use of waste (e.g., empty cement bags and containers, plastic, wooden planks) for backfilling – only inert spoil may be used for backfilling to avoid need for off-site disposal (any excess inert spoil is to be disposed of at suitably licensed waste facilities).
- (xxii) Prohibit burning of construction wastes.
- (xxiii) Prohibit dumping of construction wastes on-site, into the marine environment, in agricultural fields etc.
- (xxiv) Provide weekly toolbox talk to remind of the importance of waste disposal, prohibition of disposal on the road, in the marine environment etc., prohibition on burning of wastes, and open defecation and urination.
- (xxv) Develop a procedure/system to penalize through escalating fines or similar any construction workers who breach these requirements.
- (xxvi) Document all wastes removed off site (including excavated soil, solid and hazardous waste) using transfer notes, to be taken by licensed waste contractors who should reuse/recycle or dispose of the waste to suitably licensed and engineered waste management facilities according to type
- (xxvii) Excavated spoil that cannot be reused to a licensed disposal site as suitable for accepting inert wastes ensuring no solid or hazardous wastes are comingling with the inert excavated spoil
- (xxviii) Dispose of solid waste to suitably engineered and licensed sanitary waste facilities
- (xxix) Ensure any hazardous waste such as oily rags or old drums disposed of in suitably licensed hazardous waste facilities

- (xxx) Waste containers designated for off-site shipment to be secured and labelled with the contents and associated hazards, be properly loaded on the transport vehicles before leaving the site, and be accompanied by a shipping paper, that describes the load and its associated hazards

D. Emergency Preparedness and Response Planning

For spills and leaks an emergency preparedness and response plan tailored to the hazards associated with the project, should include:

- (i) SOP for the management of containment structures, specifically the removal of any accumulated fluid, such as rainfall, to ensure that the intent of the system is not accidentally or willfully defeated
- (ii) Implementation of inspection programs to ensure containment structures are physically intact and being well managed
- (iii) Identification of locations of hazardous materials and associated activities on an emergency plan
- (iv) Documentation of availability of specific personal protective equipment and training needed to respond to an emergency
- (v) Documentation of availability of spill response equipment sufficient to handle at least initial stages of a spill and a list of external resources for equipment and personnel, if necessary, to supplement internal resources
- (vi) Description of response activities in the event of a leak, spill, release, or other emergency including internal and external notification procedures, specific responsibilities of individuals, decision process for assessing severity of the incident and determining appropriate action, first aid and emergency medical treatment, evacuation routes, post-event activities such as clean-up and disposal, incident investigation, worker re-entry, and replenishment of used PPE and spill response equipment
- (vii) Inspecting, testing, and maintaining the emergency response equipment
- (viii) Training of workers on release prevention, including drills specific to hazardous materials stored on site

II. Health and Safety

Preventive and protective measures should be introduced according to the following order of priority:

- (i) Eliminating the hazard by removing the activity from the work process.
- (ii) Controlling the hazard at its source through use of engineering controls.
- (iii) Minimizing the hazard through design of safe work systems and administrative or institutional control measures.
- (iv) Providing appropriate personal protective equipment (PPE) in conjunction with training, use, and maintenance of the PPE.

A. OHS Training

- (i) Provisions to be made to provide OHS orientation training to all new workers to ensure they are apprised of the basic site rules of work at / on the site and of personal protection and preventing injury to fellow workers.
- (ii) Training should consist of basic hazard awareness, site- specific hazards, safe work practices, and emergency procedures for fire, evacuation, and natural disaster, as appropriate. Site-specific hazard or color coding in use should be thoroughly reviewed as part of orientation training.

- (iii) Specialty courses should be provided, as needed, to ensure that workers are oriented to the specific hazards of individual work assignments.
- (iv) Training to be provided to management, supervisors, workers, and occasional visitors to areas of risks and hazards.
- (v) Workers with rescue and first-aid duties should receive dedicated training so as not to inadvertently aggravate exposures and health hazards to themselves or their co-workers.

B. Good Health and Safety Practices

- (i) Always ensure good housekeeping in the premises, including on construction site, workers camps, storage areas, etc.
- (ii) The perimeter is to be kept neat and tidy, with no trip hazards on the ground e.g., open channels, materials, equipment, trash laying around.
- (iii) Do not leave hazardous conditions (e.g., unlit open excavations without means of escape) overnight
- (iv) Drums/containers/tanks that may contain substances that are hazardous because of chemical or toxicological properties, or temperature or pressure, to be labeled as to the contents and hazard, or appropriately color coded.
- (v) Check the load of the vehicles before use, all drivers, and passengers to fasten seatbelt and comply with all transportation-related health and safety laws and regulations.
- (vi) Examination of all equipment and tools' quality and the presence of operational safety features before use
- (vii) Checking all electrical cords, cables, and hand power tools for frayed or exposed cords and following manufacturer recommendations for maximum permitted operating voltage of the portable hand tools
- (viii) Untrained workers will not be permitted to work with live electricity or at height.
- (ix) Observe IFC EHS Guideline on Electric Power Transmission and Distribution requirements for working with live electricity - only allow suitably trained workers that meet the requirements set out in above-referred IFC guideline to work with live electricity with strict adherence to safety standards including those listed in said guidelines; these workers must have training record of attending suitable training course on electrical safety and be provided with and wear the appropriate PPE for their role.
- (x) Ensure proper grounding and deactivation of any live electricity during construction work or before any work near power lines and that this has been checked and certified by the H&S Officer in advance.
- (xi) Measure exposure levels to electromagnetic fields (EMF) and provide workers working in zones where EMF levels are above reference levels with personal EMF monitoring device to be attached onto their PPE.
- (xii) Require workers to observe the minimum approach distances for excavations, tools, vehicles, pruning, and other activities when working around power lines.
- (xiii) Double insulating/grounding all electrical equipment used in environments that are, or may become, wet; using equipment with ground fault interrupter protected circuits
- (xiv) Marking all energized electrical devices and lines with warning signs
- (xv) Labelling of service rooms housing high voltage equipment (electrical hazard) and where entry is controlled or prohibited conducting detailed identification and marking of all buried electrical wiring prior to any excavation work

- (xvi) Fall prevention and protection measures should be implemented whenever a worker is exposed to the hazard of falling >2m:
- (xvii) Observe IFC EHS Guideline on Electric Power Transmission and Distribution requirements for working at height; only allow suitably trained and qualified workers to work at height, these workers must have training record of attending suitable training course and be provided with and wear the appropriate PPE for their role.
- (xviii) Require workers to test the structural integrity of towers prior to proceeding with the work.
- (xix) Proper use of ladders and scaffolds by trained workers
- (xx) Installation of guardrails with mid-rails and toe boards at the edge of any fall hazard area
- (xxi) Use fall protection measures when working on towers, i.e., mobile elevated working platform, and all workers at height are required to wear body harness. Safety belt and lanyard travel limiting devices to prevent access to fall hazard area, or fall protection devices such as full body harnesses used in conjunction with shock absorbing lanyards or self-retracting inertial fall arrest devices attached to fixed anchor point or horizontal lifelines
- (xxii) Ensure sufficient harnesses and gear are available on site for all workers, that workers are trained to use such harness and are obligated to always use the latter when working at height.
- (xxiii) Inclusion of rescue and/or recovery plans, and equipment to respond to workers after an arrested fall
- (xxiv) Implementation of safety measures while excavating to avoid collapse e.g., shoring if soil unstable
- (xxv) PPE to be provided for all workers (regardless formal and informal, directly contracted or subcontracted) in accordance with Table 2.7.1. Summary of Recommended Personal Protective Equipment According to Hazard in IFC EHS Guidelines on OHS.
- (xxvi) Enforce disciplinary system (e.g., immediate removal from site) for non-compliance with PPE requirements and other health and safety measures (e.g., social distancing for COVID-19).
- (xxvii) Eye wash station and water supply to shower to be provided during works due to risk of fuel, oil, or chemical encountering skin.
- (xxviii) During construction works, ensure qualified first aider and trained fire marshal is always available on-site with an appropriately equipped first aid kit and appropriate fire extinguisher and other firefighting equipment immediately available for use.
- (xxix) Provide an ambulance for more serious cases to transport the patient to the hospital for treatment
- (xxx) Prepare signboards reminding of health and safety measures and procedures to follow in case of accident, including key contact details (ambulance, doctor, hospital, etc.)
- (xxxi) Keep a log of all incidents, near-misses and accidents and include these in monthly monitoring reports
- (xxxii) Check health condition of workers on daily basis, for example, use of self-certification forms and temperature checks before being allowed on the construction site with more thorough monthly health checks by qualified medical professional.

- (xxxiii) Temporary construction camps will include proper sanitation, alternative fuel to firewood, clean eating area, water supply, and secure storage of domestic solid wastes for disposal off site to suitably licensed waste management facilities.
- (xxxiv) Pit latrines prohibited, and adequate number (about 1 toilet per 6 workers, segregated male and female) of toilets and washing facility with hot and cold running water.
- (xxxv) Toilets to be equipped with soap and hand sanitizer.
- (xxxvi) There should be an indication of whether toilet and washing facility is “in use” or “vacant” if not gender segregated
- (xxxvii) Toilets should be cleaned at least twice daily to ensure they are kept in a hygienic condition.
- (xxxviii) Prevent standing water as it may become a breeding habitat for mosquitoes etc.
- (xxxix) Provide workers with access to a shaded rest area on-site.
- (xl) Provide workers with a clean eating area for breaks and lunchtime.
- (xli) Provide all construction workers will an adequate supply of potable drinking water meeting national standards.
- (xlii) If ground or surface water is used for drinking water, it must first be tested to confirm it meets drinking water standards and continue to be regularly tested. If drinking water standards are not met, potable water shall be imported to site.
- (xliii) If workers are not local to the area use may be made of existing accommodation facilities but if a construction camp is provided it must be adequately equipped with sufficient toilets, hand washing facilities, showers or baths, food preparation and clean eating area, etc.
- (xliv) Installation of barriers (a temporary fence ideally solid fence) at construction areas with hazard warning signs to deter people from accessing the construction site
- (xlv) Require all project drivers to always abide by Maldives road safety regulations.
- (xlvi) Road safety and warning signs must be posted at 500m, 100m, and immediately in advance of the works at least two weeks prior to the works commencing to inform the public of the temporary blockage.
- (xlvii) Access to the construction site will be under traffic controls when trucks enter and exit.
- (xlviii) Establishing rights-of-way, site speed limits, vehicle inspection requirements, operating rules and procedures, and control of traffic patterns or direction
- (xlix) Ensuring drivers undergo medical surveillance
- (l) Ensuring moving equipment with restricted rear visibility is outfitted with audible back-up alarms
- (li) Construction workers including subcontractors will be given awareness raising in HIV/AIDS, other communicable diseases including COVID-19, and sexual, exploitation, abuse, and harassment with strict penalties (e.g., immediate removal from site) for any non-compliance of workers to an agreed code of practice
- (lii) Avoid ponding of water during construction to avoid habitat creation of vector borne diseases e.g., malaria.
- (liii) No employee should be exposed to a noise level greater than 85 dB(A) for a duration of more than 8 hours per day without hearing protection. In addition, no unprotected ear should be exposed to a peak sound pressure level (instantaneous) of more than 140 dB(C).
- (liv) Use of hearing protection should be enforced actively when the equivalent sound level over 8 hours reaches 85 dB(A), the peak sound levels reach 140 dB(C), or

the average maximum sound level reaches 110dB(A). Hearing protective devices provided should be capable of reducing sound levels at the ear to at least 80 dB(A).

- (iv) Hearing protection is preferred for any period of noise exposure more than 80 dB(A) an equivalent level of protection can be obtained, but less easily managed, by limiting the duration of noise exposure. For every 3 dB(A) increase in sound levels, the allowed exposure period or duration should be reduced by 50%.
- (Ivi) Prior to the issuance of hearing protective devices as the final control mechanism, use of acoustic insulating materials, isolation of the noise source, and other engineering controls should be investigated and implemented, where feasible
- (Ivii) Storing flammables away from ignition sources and oxidizing materials.
- (Iviii) Defining and labelling fire hazards areas to warn of special rules (e.g., prohibition in use of smoking materials, cellular phones, or other potential spark generating equipment)
- (lix) Providing specific worker training in handling of flammable materials, and in fire prevention or suppression
- (Ix) Oxyacetylene burning equipment will not be permitted in any confined space.
- (Ixi) Burning equipment of the oxy-propane type shall be used.

C. Construction Occupational Health and Safety Plan

Occupational Health and Safety Plan (OHSP) will aim to ensure that the workplace is safe and healthy by addressing the hazards and risks at the workplace; outlining the procedures and responsibilities for preventing, eliminating and minimizing the effects of those hazards and risks; identifying the emergency management plans for the workplace or workplaces; and specifying how consultation, training and information are to be provided to employees at various workplaces.

1. **Steps to ensure maximizing of safety at construction site.** The contractor will be responsible for implementation of the following:
 - (i) Installation of signboards and symbols in risky and hazardous areas, to inform workers to be careful.
 - (ii) Ensuring that materials are all stacked, racked, blocked, interlocked, or otherwise secured to prevent sliding, falling, or collapse.
 - (iii) Vehicles will be moved only along pre-assigned routes and have well-functioning horns, reverse light and buzzer, rear view mirrors, etc.
 - (iv) Removing all scrap and waste material from the immediate work area as the work progresses.
 - (v) Use only trained staff to construct, install, handle, and repair all electrical equipment to prevent risks of electrical shocks and electrocution.
 - (vi) Install fire extinguishers and/or other fire-fighting equipment at every work site to prepare for any accidental fire hazards.
 - (vii) First aid kits shall be always made available throughout the entire construction period. Arrangement shall be made to ensure medical attention for workers who have met with an accident or sudden illness at any time during the construction period.
 - (viii) Fire protection: the employer shall be responsible for fire protection and prevention throughout all phases.

- (ix) Hand and power tools: Conditions of all hand and power tools or other reciprocating, rotating, or moving parts of equipment shall be maintained by the employer in a safe condition to prevent any accidents.
- (x) Aisles and passageways shall be kept clear to provide free and safe movement of material handling equipment and workers. Material if stored/stacked at roadside must not hinder free movement of vehicles and persons.
- (xi) The areas used for construction shall be kept in good repair to ensure safe movement of vehicle or person.

2. Personnel protective equipment. Risks to the health and safety of workers can be prevented by provision of Personal Protective Equipment (PPEs) for all workers. Personal protective equipment like safety gloves, helmet, mufflers etc. will be provided during the construction period and during the maintenance work. Depending on the nature of work and the risks involved, contractors must provide, without any cost to the workers, the following protective equipment. All PPE must be of good quality with mark of quality standard certification.

- (i) Helmet shall be provided to all workers, or visitors visiting the site, for protection of the head against impact or penetration of falling or flying objects.
- (ii) Safety belt shall be provided to workers working at heights for bridge construction, etc.
- (iii) Safety boots shall be provided to all workers for protection of feet from impact or penetration of falling objects on feet.
- (iv) Ear protecting/ earmuffs/plugs shall be provided to all workers in high noise zones.
- (v) Eye and face protection equipment shall be provided to all welders to protect against sparks.
- (vi) Respiratory protection devices shall be provided to all workers during occurrence of fumes, dusts, or toxic gas/vapor.
- (vii) The supervisor must ensure that appropriate personal protective equipment is available to workers; properly worn when required and properly cleaned, inspected, maintained, and stored.
- (viii) A worker shall be responsible for using the items of personal protective equipment provided by the employer.
- (ix) A worker who is required to use personal protective equipment must-
 - (a) Use the equipment in accordance with training and instruction.
 - (b) Inspect the equipment before use.
 - (c) Refrain from wearing protective equipment outside of the work area which if done so would constitute a hazard; and
 - (d) Report any equipment malfunction to the supervisor or employer.
- (x) A worker who is assigned responsibility for cleaning, maintaining, or storing personal protective equipment must do so in accordance with training and instruction provided.
- (xi) The safety and emergency procedures manual will be kept. Necessary training regarding the safety aspects of the personnel working at the project site will be provided.
- (xii) First aid facilities will be made available, and doctors will be called when necessary.

Personal Protective Equipment for Safety of Different Body Parts

Sr. No.	Body Part to be protected	Personal Protective Equipment
1	Head	Safety helmet, hard hat, Crash helmets
2	Eye	Eye protectors, eye protectors for radiations, shield and helmet, zero power goggles
3	Ear	Earplug, earmuffs
4	Noise-Mouth	Du respirator, gas mask, self-contained breathing apparatus, dust masks
5	Hand	Standard work gloves, cutting gloves, leather work gloves, heat protective gloves, anti-vibration gloves
6	Foot	Industrial safety boots, chemical-proof boots
7	Body	Standard work clothing, chemical-proof clothing, heat protective clothing, leather apron
8	Others	Safety belts, personal protective equipment for radiation protection, back support belts
9	COVID-19	Sanitizer, masks, etc.

Contents of First-Aid Box

Sr. No.	Description	Quantity
1	First aid leaflet	1 copy
2	Sterilized finger dressing	10 nos.
3	Sterilized hand or foot dressing	10 nos.
4	Sterilized body or large dressing	6 nos.
5	Sterilized burns dressing - small	4 nos.
6	Sterilized burns dressing - large	2 nos.
7	Sterilized burns dressing – extra large	6 nos.
8	Sterilized cotton wool (25 gms)	2 tubes
9	Cetavolon	2 tubes
10	Eye pads	6 nos.
11	Adhesive plaster	1 spool
12	Assorted roller bandage	6 nos.
13	Triangular bandages	6 nos.
14	Safety pins	6 nos.
15	Scissors, ordinary, 12.7cms, both sides sharp	1 pair
16	Antiseptic liquid, 150 ml, or equivalent	2 nos.
17	Cotton wool for padding, 100 gms	2 packets
18	Eye Ointment of sulphacetamide preparation	1 tube
19	Loose woven gauze (28"x8"), compressed pack	1 packet
20	Aspirin, 300 mg (10 tablets)	5 strips
21	Note Pad, with a pencil in a plastic cover	1 no.
22	Adhesive dressing strips	10 strips
23	Field dressing of modified army pattern	3 nos.
24	Record cards in a plastic cover	1 set
25	Torch, medium size	1 no.
26	Eye wash	1 no.
27	Wooden splints, small	1 set
28	Wooden splints, big	1 set
29	Disinfectant, Spirt, 100ml	1 bottle

3. **Health management plan.** Full-fledged hospital facilities should be made available round the clock for attending emergency arising out of accidents, if any. All working personnel should be medically examined at least once every six

month and at the end of his/her term of employment. This is in addition to the pre-employment medical examination. Contractor will implement the following:

- (i) **Medical emergency response planning for disaster management plan.**
 - (a) Control of vectors in the project site; stagnant water to be drained off, raise awareness among the workers to combat spread of vector borne diseases, self-hygiene.
 - (b) Screening Programs for Diabetes, Hypertension, COVID-19, AIDS, and Occupational Diseases etc.
 - (c) Preventive Health Examinations e.g., Pre-employment, Periodic (Annual) health examinations.
 - (d) Medical Surveillance Program for health impacts of hazards.
 - (e) Workers Immunization against Tetanus, Hepatitis, COVID-19 etc.
- (ii) **Records and documentation.** Contractor will document and keep record making them available for review. Reports prepared by the contractor should include information on the place, date and time of the incident, name of persons involved, cause of incident, witnesses present and their statements. Based on such reports, the management can jointly identify any unsafe conditions, acts or procedures and recommend for the contractor to undertake certain mitigative actions to change any unsafe or harmful conditions.
- (iii) **Accidents and diseases monitoring.** Establish procedures and systems for reporting and recording:
 - (a) Occupational accidents and diseases
 - (b) Dangerous occurrences and incidents
 - (c) These systems should enable workers to report immediately to their immediate supervisor any situation they believe presents a danger to life or health.
 - (d) The systems and the employer should further enable and encourage workers to report to management all:
 - (1) Occupational injuries and near misses
 - (2) Suspected cases of occupational disease
 - (3) Dangerous occurrences and incidents

All reported occupational accidents, occupational diseases, dangerous occurrences, and incidents together with near misses should be investigated with the assistance of a person knowledgeable/competent in occupational safety. The investigation should: Establish what happened; Determine the cause of what happened, identify measures necessary to prevent a recurrence, Distinction is made between fatal and non-fatal injuries. The two main categories are divided into three sub-categories according to time of death or duration of the incapacity to work. The total work hours during the specified reporting period should be reported to the appropriate regulatory agency.

- (iv) **Compensation for Injuries and death.** Any casualty or injury resulting from occupational activities should be compensated as per Maldives regulations. Where compensation is sought by the injured party, proper procedures for documentation of the case will be followed, including a detailed report on the accident, written reports from witnesses, report of the examining doctor and

his/her recommendation for treatment. Each individual contractor will be responsible for ensuring compensation for the respective workers.

- (v) **Offences.** Workers should abide by the following regulations also, which are to be supervised by the Contractor:
 - (a) No gambling is to be in project site area, either construction site or camps, which may lead to conflicts
 - (b) No drugs or alcohol abuse to be tolerated in the project site area
 - (c) Workers should not be minor (below 18 years age)

Restriction on keeping any dangerous arms or equipment (licensed or not) when in the project area, except for security personals.

- (vi) **Structural Safety of Project Infrastructure**
 - (a) Inclusion of buffer strips or other methods of physical separation around project sites to protect the public from major hazards associated with hazardous materials incidents or process failure, as well as nuisance issues related to noise, odors, or other emissions
 - (b) Incorporation of siting and safety engineering criteria to prevent failures due to natural risks posed by earthquakes, cyclone, cloud burst, flooding, and fire. To this end, all project structures should be designed in accordance with engineering and design criteria mandated by site-specific risks, including but not limited to seismic activity, wind loading, and other dynamic loads
 - (c) Application of locally regulated or internationally recognized building codes to ensure structures are designed and constructed in accordance with sound architectural and engineering practice, including aspects of fire prevention and response
 - (d) Engineers and architects responsible for designing and constructing facilities, building, plants, and other structures should certify the applicability and appropriateness of the structural criteria employed.
- (vii) **Fire prevention.** Fire prevention addresses the identification of fire risks and ignition sources, and measures needed to limit fast fire and smoke development. These issues include:
 - (a) Fuel load and control of combustibles
 - (b) Ignition sources
 - (c) Interior finish flame spread characteristics
 - (d) Interior finish smoke production characteristics
 - (e) Human acts, and housekeeping and maintenance
 - (f) Fire Suppression and Control. Fire suppression and control includes all automatic and manual fire protection installations, such as:
 - (g) Automatic sprinkler systems
 - (h) Manual portable extinguishers
 - (i) Fire hose reels
- (viii) **Emergency response plan.** An Emergency Response Plan is a set of scenarios-based procedures to assist staff and emergency response teams during real life emergencies and training exercises.

(ix) Traffic safety

- (a) Traffic safety should be promoted by all project personnel during displacement to and from the workplace, and during operation of project equipment on private or public roads. Prevention and control of traffic related injuries and fatalities should include the adoption of safety measures that are protective of project workers and of road users, including those who are most vulnerable to road traffic accidents. Road safety initiatives proportional to the scope and nature of project activities should include:
- (b) Adoption of best transport safety practices across all aspects of project operations with the goal of preventing traffic accidents and minimizing injuries suffered by project personnel and the public. Measures should include:
- (c) Emphasizing safety aspects among drivers
- (d) Improving driving skills and requiring licensing of drivers
- (e) Adopting limits for trip duration and arranging driver rosters to avoid overtiredness
- (f) Avoiding dangerous routes and times of day to reduce the risk of accidents
- (g) Use of speed control devices (governors) on trucks, and remote monitoring of driver actions
- (h) Regular maintenance of vehicles and use of manufacturer approved parts to minimize potentially serious accidents caused by equipment malfunction or premature failure.

(x) The procedures for transportation of hazardous materials should include:

- (a) Proper labelling of containers, including the identify and quantity of the contents, hazards, and shipper contact information
- (b) Providing a shipping document (e.g. shipping manifest) that describes the contents of the load and its associated hazards in addition to the labelling of the containers. The shipping document should establish a chain-of-custody using multiple signed copies to show that the waste was properly shipped, transported and received by the recycling or treatment/disposal facility
- (c) Ensuring that the volume, nature, integrity and protection of packaging and containers used for transport are appropriate for the type and quantity of hazardous material and modes of transport involved
- (d) Ensuring adequate transport vehicle specifications o Training employees involved in the transportation of hazardous materials regarding proper shipping
- (e) procedures and emergency procedures using labelling and placarding (external signs on transport vehicles), as required
- (f) Providing the necessary means for emergency response on call 24 hours/day

D. Operational Occupational Health and Safety Plan

Powerhouses have significant hazards present which can result in injury or death. Risks should be reduced through proper hazard identification, careful planning of works, briefing of procedures to be followed, documented and regular inspection and maintenance. The health

and safety objective of O&M of all project facilities is to keep all people at the site, visitors, or workers, and to operate the facility in a safe manner so that health and safety are integrated into all that we do. It is important that all O&M personnel have the relevant qualifications to perform the works in a safe, responsible, and accountable manner. Managing the risks posed by the plant to the health and safety of people, both on and around the plant, is a primary concern of all stakeholders.

- (i) Any person coming on to the plant should expect some form of induction to ensure they are briefed on any hazards and risks.
- (ii) Staff working on electrical equipment must be appropriately trained, experienced, and supervised, but it is also key that others working around the equipment - for example panel cleaners - are equally aware of the potential risks and have safe methods of working around HV and LV electricity.
- (iii) Hazardous areas and equipment should carry appropriate markings to warn personnel of possible hazards and wiring sequence. Such markings should be clear and evident to all personnel and third parties (and intruders) entering the plant premises.
- (iv) It is important that the plant access control and security system keeps people away from areas of danger and that they are appropriately supervised and inducted as necessary.
- (v) FENAKA is ultimately responsible for the compliance of health and safety regulations within the site/plant.
- (vi) FENAKA must make sure that, always, the installation and all equipment meet the relevant legislations of the country and also, that all contractors, workers and visitors respect the H&S legislation by strictly following the established procedures, including the use of established personal protective equipment (PPE).
- (vii) At the same time, the O&M Contractor employed for various works should prepare and operate its own safety management systems to be agreed with FENAKA taking into account site rules and the works in relation to health and safety and perceived hazards.
- (viii) To achieve a safe working environment, all work must be planned in advance, normally written plans are required.
- (ix) Risk assessments need to be produced which detail all the hazards present and the steps to be taken to mitigate them.
- (x) The following dangers are likely to exist on most power plant and must be considered when listing hazards in order to identify risks. The severity of any injuries caused may be exacerbated by the terrain and remoteness of the plant.

1. General Health and Safety Instructions

It is critical personnel know and understand the safety rules and requirements that apply to the work being performed. Specifically, to:

- (i) Follow all safety programs, policies, procedures and work rules
- (ii) Ensure your own safety and the safety of your fellow workers
- (iii) Ensure there are a sufficient number of qualified workers to perform the work
- (iv) Immediately address any unsafe conditions or behaviors observed in the workplace
- (v) Immediately report any unsafe condition so that it can be corrected

- (vi) If you encounter an unsafe condition, feel that there is an unaddressed safety concern or are not comfortable with your ability to perform a job...STOP and resolve the situation before continuing work.

2. General Site Safety Rules

All contractor personnel working or visiting the site for the first time must receive Safety Induction Training prior to being allowed access to the array or any equipment

- (i) All contractor personnel must report to work fit for duty and free of the effects of drugs or alcohol
- (ii) Personnel shall not consume alcohol or drugs while working or driving
- (iii) All visitors must be escorted while on site unless they have completed appropriate training and have been approved for unescorted access
- (iv) All personnel must always wear the appropriate Personal Protective Equipment (PPE)
- (v) Electrical work shall be performed under a Lockout Tag out and only after the circuit has been tested to ensure a zero-energy state
- (vi) Authorization and a Confined Space Entry Permit shall be obtained prior to working in a classified confined space
- (vii) Never walk under a suspended load
- (viii) Do not use mobile phones while driving or operating equipment
- (ix) Always wear a seat belt in vehicles and do not exceed the posted speed limits
- (x) All accidents, injuries, spills or environmental incidents and near-miss events shall be reported to the site in charge or designee as soon as possible. In all cases reports must be made within 24 hours

3. Emergency Response Instructions

- (i) Ensure a two-way communication means is available on site for prompt emergency response, as a minimum this is to be an operating Mobile Phone
- (ii) Ensure emergency contact information is readily available. The "Emergency Contact Poster" should be prominently posted in the OPERATIONS building for quick and easy access
- (iii) Immediately contact the Site In charge or Designee to inform of the emergency
- (iv) In the event of an emergency, the safety of people shall always be the PRIORITY
- (v) Attend to any injured personnel in so far as is required to prevent further injury and provided no other person is put at risk in the process
- (vi) All personnel on the site shall be alerted to emergencies by verbal command and directed to a designated Muster Point.
- (vii) Emergency Muster Point
 - (a) The location of the site emergency muster point or evacuation area is the Main Plant Access Gate. This will be communicated during the Site Safety Induction training
 - (b) Once emergency services have been notified, site personnel shall, at the earliest opportunity, contact the Site In charge to report the incident and determine the appropriate course of action.

4. First aid

- (i) FENAKA will make sure that all its personnel and contractors have access to the necessary first aid facilities and competent personnel as required under safety legislation, including a list of First Aid officers and training requirements

- (ii) A First Aid Kit and an Automated External Defibrillator (AED) will be made available on site
 - (iii) First Aid Kits are to be available in the O&M Building and in the vehicles
 - (iv) An AED will be in the O&M Building.
- 5. Incident reporting**
- (i) A vital part of performing quality work includes the ongoing responsibility for each worker to evaluate working conditions for themselves and their co-workers and to promptly report any unsafe conditions or any condition which may lead to or cause a safety violation.
 - (ii) FENAKA will not terminate, discipline, or otherwise discriminate against any employee for bringing safety or environment concerns to the attention of supervision.
 - (iii) All incidents that cause or have the potential to cause personal injury or damage to property or material harm to the environment must be externally reported and investigated to prevent re-occurrence.
- 6. What is to be reported:**
- (i) All injuries or illnesses, regardless of severity, sustained by employees, contractors and visitors or members of the public
 - (ii) Any site property damage
 - (iii) Any damage to the environment. However only material harm incidents are reported externally
 - (iv) Any hazard or near-miss incident which has the potential for injury, illness or damage to the environment, property, or assets
 - (v) All medical treatment injuries and first aid injuries are to be reported.
- 7. Why is it to be reported:**
- (i) To initiate the process of assessment of risks associated with a hazard or incident and investigation of its causes, so that corrective actions can be implemented to prevent future occurrences
 - (ii) To allow us to learn from the experience of others, thus maintaining a prevention focus

E. Housekeeping and Orderliness

9. Prior to entering work location, employees should STOP to observe the work area and make note of any hazards, or conditions that may have changed since their last entry. The following are general rules of good housekeeping and orderliness that enhance the ability to work safely:

- (i) Scrap, trash, and other wastes shall be placed in the appropriate designated containers
- (ii) Waste shall be placed in containers specifically designated for that material
- (iii) Areas shall be cleaned up as the work progresses
- (iv) Cords and hoses shall not be routed in walkways. They should be routed, preferably overhead, in a manner that shall not present a tripping hazard
- (v) Tools and equipment shall be properly stored in a stable position (tied, stacked, or choked) to prevent rolling or falling
- (vi) Cleaning materials and consumables shall be kept in approved containers and stored properly

- (vii) Safe access to all work areas and emergency exits shall be maintained
- (viii) Do not block emergency equipment, electrical disconnect switches or breaker panels. Cables, ropes, barricade tape, hoses, or shielding shall not be attached to such equipment
- (ix) Work areas shall be checked at the beginning and end of each shift to ensure safe conditions.
- (x) Work areas shall have adequate lighting.
- (xi) Personnel must take responsibility for identifying housekeeping hazards that contribute to an unsafe work environment by reporting them promptly to their immediate supervisor or by removing the hazard.

8. Office Safety

- (i) When using stairs, hold handrails to maintain two points of contact
- (ii) Keep stairways, hallways, aisles, and walkways clear of clutter and tripping hazards
- (iii) Go around corners slowly to avoid collisions
- (iv) Do not run or slide across floors or through doorways
- (v) Open doors slowly to avoid striking someone on the other side
- (vi) Use door handles, do not push on glass panes on doors
- (vii) No smoking in offices or storage areas
- (viii) Keep desks, file and cabinet drawers, door slides and locker doors closed when not in use
- (ix) Know the location of emergency exits, fire extinguishers, and first aid kit
- (x) Use proper ladders or portable steps to gain access to elevated materials and equipment
- (xi) Do not use chairs, desks, or tables as a substitute for proper ladder
- (xii) Ensure all power cords and extension cords are properly insulated and placed so to not create a tripping hazard
- (xiii) Do not store materials on top of racks or shelves within 50cm of light fixtures, light bulbs, or sprinkler heads
- (xiv) Do not store materials in front of mounted fire extinguishers or within 40cm of electrical panels
- (xv) Principles of good housekeeping should be adhered to.

9. Personal Protective Equipment

- (i) **General PPE Instructions.** Inspect all PPE prior to use to ensure it is safe, properly assembled and not visibly defective. Personal Protective Equipment (PPE) shall be maintained in a sanitary and reliable condition. Damaged or otherwise unserviceable PPE shall be properly disposed of and replaced. Personnel shall be trained and must demonstrate that they understand the following:
 - (a) When PPE is necessary
 - (b) What PPE is necessary
 - (c) How to properly adjust, wear and use PPE
 - (d) The limitations of the PPE
 - (e) The care, maintenance, useful life, and disposal of PPE.
- (ii) **Minimum PPE Requirements.** PPE requirements are based on Job Hazard Analysis for the specific work that is to be performed. Minimum PPE requirements

are usually established for routine work such as site tours and visual inspections. These minimum requirements are:

- (a) Hard Hat
 - (b) Safety Glasses
 - (c) Safety Shoes –Safety Toed with Electrical rated soles preferred
 - (d) Work Clothing – No shorts, sweatpants or sleeveless shirts allowed. Long pants and work type shirt (long or short sleeved). Site Technicians are required to wear Arc Rated clothing as part of their regular work uniform (HRC 2 or > 8.1 cal/cm²)
 - (e) Work Gloves – Leather, shall be carried if there is a possibility of material handling.
 - (f) Based on the job you are performing additional PPE may be required. Additional PPE may include:
 - (g) Arc Rated (FR) Clothing–Arc rating is based on Arc Hazard Analysis and is typically identified on Equipment Arc Flash Hazard Labels. Clothing may include shirt and pants or could include higher rated Arc Flash Suits
 - (h) Arc Flash Face Shield – Arc Flash Face Shields are required where hazards are HRC 2 or above
 - (i) Hearing Protection – For areas posted as greater than 80dB or where noise levels make it difficult to hear another worker speaking
 - (j) Safety Vest – To improve visibility
 - (k) Kevlar or cut resistant gloves – For glass handling activities
 - (l) Protective Chemical Clothing – If exposed to or handling chemicals
 - (m) Insulated gloves for electrical work.
- (iii) FENAKA will provide PPE including hard hats, safety eyeglasses, hearing protection, and work gloves.
- (a) Work Clothing: Arc Flash Clothing including a shirt covering the shoulders and trousers covering the legs and ankles shall be always worn when working on or near energized electrical equipment.
 - (b) Arms—When working in the vicinity of energized lines or equipment (both high and low voltage), on high temperature lines, grinding, welding, or other high exposure hazards to the arm, full-length sleeves shall be worn.
 - (c) Legs—Workers should not have cuffs on trousers when welding or performing any job that produces sparks.

10. Personnel Work Policy

(i) Working Alone

- (a) A person is alone at work when they are on their own, when they cannot be seen or heard by another person, and when they cannot expect a visit from another worker or member of the public for some time.
- (b) The risk of injury or harm to an individual who works alone may be increased because of difficulty contacting emergency services when they are required.
- (c) Emergency situations may arise because of the sudden onset of a medical condition, accidental work-related injury or disease, attack by an animal, exposure to the elements, or by becoming stranded without food or water.

- (d) The consequences may be very serious, and the injury or disease may be fatal.
- (e) In preparing to undertake work that may involve working alone, the following must be considered:
 - (1) When and wherever possible, avoid working alone. Tasks should be scheduled during normal business hours, or when another worker capable of helping in the event of an emergency is present.
 - (2) The work to be done, which will typically be energy isolation activity (and conducted as part of energy isolation, should be discussed during the pre-start discussion for that day.
 - (3) Regular communication (via radio) should be made by the person undertaking the work and they should check back in after the work is completed.

(ii) **Working at Night**

- (a) There may be a requirement to work at night, this poses several additional hazards and risks to personnel than normal day working; these are typically related to visibility and the ability to move around the site safely
- (b) Working at night requires some specific activities to occur (during daylight hours) to ensure the night shift personnel are assisted and protected from hazards and risks. For example, appropriate lighting equipment must be in place to provide adequate illumination of the work area and immediate surrounds to ensure personnel have optimal visibility
- (c) All work at night shall be assessed and approved by the site in charge on a case-to-case basis.

(iii) **Hand and Power Equipment**

- (a) All hand-held power tools and appliances are protected by an RCD
- (b) Where available, only double insulated power tools are used at the site
- (c) Power tools, leads and plugs are regularly tested-and tagged for external damage or makeshift repairs
- (d) Do not use tools if the casing, cords or plugs are broken or damaged
- (e) Do not adjust tools without first switching off and removing the plug from the outlet.
- (f) All personnel required to use hand tools and/or power equipment, including chain saws, brush cutters, powder-actuated tools, and similar high-hazard implements, are appropriately trained to enable the safe operation of such equipment.

(iv) **General EHS requirements include but not limited to:**

- (a) Use the right tool for the job
- (b) Don't use broken or damaged tools, dull cutting tools, or screwdrivers with worn tips
- (c) Cut in a direction away from the body
- (d) Make sure grip and footing are secure when using large tools
- (e) Always keep tools secure when working at heights
- (f) Pass a tool to another person by the handle - never throw a tool
- (g) Use the right PPE for the job
- (h) Never carry sharp or pointed tools such as a screwdriver in a trouser pocket

- (i) Select ergonomic tools for the work task, particularly when movements are repetitive and forceful
- (j) Ensure tools are always kept in good condition
- (k) Store tools properly at the end of shift.
- (l) Personnel shall also inspect all hand tools and power equipment on a regular basis. Defective tools or equipment shall be immediately removed and tagged Out of Service or destroyed to prevent further use.

11. Material Handling and Storage

- (i) **Musculoskeletal injuries.** A musculoskeletal disorder is an injury or disease of the musculoskeletal system. Musculoskeletal disorders may arise in whole or in part from performing manual tasks in the work environment, whether occurring suddenly or over a prolonged period. Musculoskeletal disorders include body-stressing injuries and conditions such as:
 - (a) Sprains and strains of muscles, ligaments and tendons (e.g. back strain)
 - (b) Joint injuries or degeneration (e.g. frozen shoulder or arthritis of the back)
 - (c) Disc protrusions, disc herniations or disc degeneration of the back or neck
 - (d) Nerve injury or compression (e.g., carpal tunnel syndrome)
 - (e) Muscular and vascular disorders (e.g. vibration-induced white finger from hand-arm vibration)
 - (f) Soft tissue injuries. Musculoskeletal disorders may result from:
 - (g) Gradual wear and tear caused by frequent or prolonged periods of performing manual tasks
 - (h) Sudden damage caused by intense or strenuous manual handling or awkward lifts
 - (i) Direct trauma caused by unexpected events.
- (ii) **Preventing Injuries**
 - (a) Prior to undertaking any manual handling activity, personnel must evaluate the object and the required task to determine if they can handle the object safely.
 - (b) Some evidence shows that the risk of back injury increases significantly with objects over 16 kg, therefore, from a standing position it is advisable to keep the load below this weight. In seated work, it is advisable not to lift loads more than 4.5 kg.
 - (c) In the event personnel are in doubt about whether they can safely move the object by themselves, additional manual or mechanical help should be obtained, or the task should be avoided.
 - (d) If a heavy object is to be moved to another location, the safest transport route should be determined prior to the activity. The area around the object and the route over which it will be transported should be checked for slip, trip, and fall hazards. Hazards should be removed prior to initiation of the task.
 - (e) The object to be moved should be inspected for pinch points, grasping, or handling hazards, including slivers, sharp edges, grease, water, etc. Eliminate or abate any identified hazards where possible. Safe grasping or handling points on the object should be determined.

- (iii) **Material handling and/or lifting.** Check for stability by testing the weight carefully either by pushing or lifting at one of the corners. The following proper lifting techniques shall be always observed:
 - (a) Make sure you have a clear path to carry the load, and a place to set it down
 - (b) Bend the knees, place your feet close to the object and center yourself over the load
 - (c) Get a good handhold
 - (d) Lift straight up, smoothly, and let your legs do the work, not your back!
 - (e) Exhale as you make the lift
 - (f) Do not twist or turn your body while carrying the load
 - (g) Set the load down slow and controlled
 - (h) Always push a load on a cart or dolly, do not pull it
 - (i) If it's a long load or awkward, get additional help
 - (j) Split the load into several smaller ones when you can.

12. **Electrical safety**

- (i) **Training and Qualifications**
 - (a) Only persons who are qualified and authorized are permitted to perform work on or near exposed, energized electrical equipment or to open enclosures or panels that contain exposed energized electrical parts or equipment.
 - (b) All energized work must be performed with two qualified persons. Both persons shall be certified in First Aid, CPR, and the use of an AED
 - (c) Persons working on "live" lines or equipment shall have had appropriate training, be competent and familiar with the equipment and be aware of the all the potential risks involved with the work.
- (ii) **Basic Electrical Safety Principles**
 - (a) Emphasis must be put on avoiding working on energized electrical equipment, unless unavoidable. All electrical lines and equipment shall be considered "live" (energized) until proven "dead" (de-energized)
 - (b) The "live, dead, live" testing method shall be used to prove that a line or piece of equipment is de-energized
 - (c) All electrical lines and equipment shall not be worked as "de-energized" until a Lockout/Tagout (LOTO) is in place
 - (d) Workers must be insulated from the energized parts with insulated gloves and/or sleeves, or a barrier or guard shall be in place between energized parts and the worker
 - (e) Conductive items such as jewelry or clothing shall not be worn during energized electrical work.
- (iii) **Working on or Around Electrical Equipment**
 - (a) All persons who work near live electrical apparatus shall understand the hazards and the limits of their movements.
 - (b) A Safety Observer shall be appointed when persons are working on or near energized electrical lines.
 - (c) All Energized work shall have an "Energized Electrical Work Permit" completed prior to the start of work. All insulated hand tools used near live

electrical equipment must be insulated to 2x the highest voltage likely to be encountered.

- (d) Visually inspect all insulated tools prior to use and check for testing certification or calibration details (Been done? Within date?)
- (e) Verify that test metering or sensing devices are operating properly and that appropriate settings are used
- (f) Safe approach distances are areas around energized electrical lines and equipment into which no part of a person, equipment, or object (other than insulated) may encroach.

13. Operation of Vehicles and Equipment

- (i) Mobile Equipment. Ensure the safe operation of mobile/heavy equipment, such as graders, water trucks, loaders, and other smaller equipment, such as excavators, forklifts, mobile cranes, backhoes and other large trucks. Mobile/heavy equipment should have the following safety specifications:
- (ii) Seat belts for all occupants
 - (a) Adequate lighting (e.g., headlights, tail, turn, brake, operating strobe or flashing light)
 - (b) Adequate walkways, railing, steps/grab handle combinations and boarding facilities including an alternative path of disembarking in case of emergency
- (iii) Reversing alarms and the use of spotters
- (iv) Horn
- (v) Effective windscreen wipers
- (vi) Effective guarding on accessible moving parts
- (vii) Signage on the equipment that allows clear and easy identification from a distance.
 - (a) Approved or certified roll-over protection
 - (b) Two-way radio or other forms of communication.

14. Walking and Working Surfaces

- (i) Risk factors that contribute to slip, trip, and fall injuries will vary according to the work environment and work tasks being completed. Common risk factor categories include:
- (ii) Floor surface and condition
- (iii) Uneven terrain and dense vegetation
- (iv) Floor contamination
- (v) Objects on the floor
- (vi) Ability to see floor, walkways, barricades and/or hazards
- (vii) Cleaning/ spill containment
- (viii) Space and design
- (ix) Stairs and stepladders
- (x) Work activities, pace, and processes
- (xi) Footwear and clothing
- (xii) Individual factors
- (xiii) Slip, trip and fall hazards may be identified by reviewing hazard or incident reports, talking with Project personnel, completing a regular walk-through and inspections of work environments. DGPL shall ensure the implementation of a risk-based approach to the management of slips, trips and falls at the power plant.

This should include regular inspections of work areas to identify areas or items of risk.

15. Fire Safety, Vegetation/Tree Fire Management

(i) Fire Prevention

- (a) Be alert for fire hazards and eliminate such hazards if possible. If a fire hazard cannot be eliminated, then report it to the site in charge
- (b) Good housekeeping is one of the most effective aids to fire prevention. Keep work areas clean and clutter-free.
- (c) Wastepaper, rags, and other combustible material shall not be allowed to accumulate.
- (d) Vegetation on the site should not be allowed to grow such that dry conditions will create a risk of ground fire on the site or propagate an offsite grass fire throughout the site. Vegetation across the site and along site boundaries shall be monitored monthly.
- (e) Explosive, flammable, or combustible material shall be stored only in approved containers consistent with manufacturer instructions. Store all flammable and combustible liquid containers in a fireproof cabinet designed to safely store such materials.
- (f) Explosive or flammable material storage areas shall be in areas that minimize the propagation of fire to occupied areas or other structures.
- (g) Spark-producing equipment shall be prohibited within 20 meters of explosive or flammable storage or where flammable liquids, or vapors or vegetation and grass are present.
- (h) Outdoor cooking equipment shall not be used, nor shall spark-producing activities be conducted when wind gusts are periodic or during periods of high velocity sustained winds.

(ii) Fire detection and alarms. Fire detection equipment will be installed in the O&M and ancillary/office buildings, staff quarters, and all major system/units. These detectors will:

- (a) Activate alarms locally.
- (b) Shall be checked annually with a smoke generator
- (c) Shall have the battery replaced annually as applicable.
- (d) Evaluate the location, type, and size of the fire to determine necessary actions.
- (e) The address and name of the nearest fire/facility should be clearly posted and lighted or otherwise illuminated.
- (f) Specific fire code requirements address how and where fire extinguishers are located within a building, therefore the current location of mounted fire extinguishers shall not be changed unless approved because of a building code review by a qualified person.
- (g) Fire extinguishers should also be available within each Company vehicle. Fire extinguishers shall be checked monthly to verify no visible damage or obstructions, proper charge/pressure, and accessibility/availability.

16. Emergency Scenarios

(i) Fatal Accidents

- (a) During emergency operation, if there is any injured person, ensure attendance of First Aid Team and carry out the first aid.
- (b) Inform the Emergency Response Team.
- (c) If the accident is severe, ensure an emergency vehicle for taking the victim to local hospital or recommended nursing home, phone numbers should be available in the site.
- (d) Accident report should be prepared with the help of witnesses and preserve it to the Emergency Response Team.

(ii) **For Flood**

- (a) Evacuate the people from flooded areas and place them to a safe area.
- (b) Switch of the power supply from effected area.
- (c) Although no record of flood in the plant area, the structures will be designed to factor in the flooding risk.
- (d) Coordinate with local Emergency Response Team and act as per their guidelines.
- (e) In case of any accident, ensure the presence of first aid team and get medical attention as soon as possible.
- (f) Ensure presence of nearby firefighting team/system in case of worst or out of control situation.

(iii) **For Earthquake**

- (a) Isolate electrical supply wherever it is possible.
- (b) All electric connections of the plant should be cut off.
- (c) Safe evacuation is important for everybody, and measures should be taken accordingly.
- (d) Must evacuate as per evacuation plan.
- (e) Project should have Rescue Team to help the injured employees. And they will also take the injured employees for treatment.
- (f) Ensure the flammable liquids i.e., Petrol, Diesel and other petroleum products are stored under secondary containment with due precautions.

(iv) **For Fire**

- (a) Evacuate the people from the fire hazard area and send them to a safe exit direction.
- (b) Remove unwanted combustible material.
- (c) Inform the substation/GRID to get the plant isolated from power supply.
- (d) Keep Fire Hydrant accessible.
- (e) Keep good condition fire hoses and Fire Extinguishers readily available.
- (f) Ensure one operator is always present at Hydrant system area when using the fire hydrant system.
- (g) If the fire is very small, use the correct Fire Extinguisher for extinguishing the fire.
- (h) Try to isolate the fire by removing the surrounding inflammable material around.
- (i) In case of large fire use local hydrant system for extinguishing the fire.
- (j) If the fire is beyond control, inform the security or higher authority to call local fire brigade and Inform Emergency Response Team.
- (k) On arrival of the fire brigade, help them to reach the site of fire.

- (l) In case of any accident of human, ensure immediate medical attention as soon as possible.