

ESAP ref.	Action	Environmental & Social Risks (Liability/ Benefits)	Requirement (legislative, lender requirement (e.g. EBRD PR), Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
PR1	Assessment and Management of Environmental and Social Impacts and Issues						
1.1) Submit an environmental and social report to the lenders on the environmental and social performance of the Project and the status of the implementation of this ESAP.	Lender reporting requirement	EBRD PR 1	Project Company Management time	Construction Phase: Update to the Lenders ever six months for the duration of construction phase. Operation Phase: Annual E&S report and ESAP progress update to the lenders within 60 days of Company year-end for the duration of lender financing of the Project.	Environmental and social reports (template to be provided by the lenders) and ESAP progress updates received. Reports and progress against this ESAP satisfactory to the Lenders.	
1.2) All permits required as per the CTA must be obtained prior to start of relevant Project phase.	Legal compliance	EBRD PR 1 National legislation	Project Company Management time	Prior to Financial Close or Construction (or relevant phase)	Receipt of all permits as per CTA requirements	
1.3) Update the Contractor Management Plan with: - project supply chain environmental and social management measures. - project HR policy on labour aspects and conditions appropriate to the project Audit and monitoring	Contractor EHSS management	EBRD PR 1 and national legislation Best Practice	Project Company Management time Appointment of Project EHS Manager Contractors to update	Prior to Construction) Development of comprehensive CM Plan) Contractual agreements with all service providers and	

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	<p>procedures including labour and regular safety audits</p> <ul style="list-style-type: none"> - measures associated with the storage and handling of hazardous wastes and appropriate training - Avoidance and management of vector and communicable diseases <p>) Reference to the CMP and appropriate terms, conditions, and clauses are included within contractor and supplier contractual agreements.</p> <p>) Ensure that appropriately qualified named EHS officers are identified for all key roles.</p>			the CMP.		<p>contractors to include relevant E&S procedures</p> <p>) E&S lenders' advisor monitoring reports</p>	
1.4	<p>) Development of a project-specific ESMS in line with the requirements of ISO14001 and OHSAS 18001 (ISO 45001 standards) which includes an environmental and social policy that is applicable to the Project. This should outline commitments aimed towards the sustainable and sound management of environmental and social subjects, issues related to the construction and operation of the windfarm and responsibilities with regards to meeting its stakeholders' expectations. The Policy will include a Human Resources Policy and H&S Policy.</p>	Promotion of sustainable project policies	EBRD PR 1 Best Practice	Project Company Management time Contractors	ESMS for Construction Prior Construction ESMS for operation prior to Operation	Development of comprehensive project-specific ESMS, the implementation of which will be audited 6 monthly during construction and annually during the first 2 years of operation	
1.5	<p>) Update ESMMP to include:</p> <ul style="list-style-type: none"> - implementation timescales and individual responsibilities for all actions. 	Management and mitigation of Environmental and Social risks	EBRD PR 1 Local permitting requirements	Project Company Management time Project EHS lead appointed to take	Prior to Project mobilisation Ongoing updates	Detailed ESH monitoring plans in line with international standards	

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	<ul style="list-style-type: none"> - details on resource use and waste management (through detailed waste management plan) - details on water minimization, use and disposal (through detailed water management plan) - details on the use of pesticides and the development of an IPM if required - Updated (BAP see ESAP ref 8) <p>Updated Cultural Heritage Mitigation and Management measures (see ESAP ref 10)</p> <p>Enhance the E&S monitoring procedures to include frequency of monitoring and indicators.</p> <p>Include the requirements of the ESIA, the ESAP, permits and approvals and other contractual requirements into a consolidated overarching ESMMP. In addition to the ESMMP the following plans have been prepared:</p> <ul style="list-style-type: none">) Stakeholder Engagement Plan) Livelihood Restoration and Compensation Framework) Biodiversity Action Plan) Chance Finds Procedure) Air Quality Management Plan) Erosion Control, Soil and Spoil Management Plan) Noise Management Plan) Waste Management Plan) Contractor Management Framework Plan) Livelihood Restoration and Compensation Plan 			<p>ownership and responsibility for ESMMP implementation and development</p> <p>Contractors</p>	and reviews	<p>Lenders review and approval</p> <p>Appropriate auditing and reporting as per the ESMMP and associated standalone management plans</p>	

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1.6) Ensure the right resources are available as per the CH management plan and as per PR8 and PS8.	Management of culture sites	EBRD PR 8 IFC PS 8	Project Management time	Prior to construction	Appointment of relevant experts	
PR2	Labour and Working Conditions						
2.1) Develop a project specific Human Resources Policy in line with PR 2 and SA 8000 standard. The following should be detailed as a minimum; <ul style="list-style-type: none"> - Child and Young Labour - Forced, compulsory Labour - Right to freedom of association and collective bargaining - Overtime - Non-discrimination, equal opportunities and remuneration - Recruitment, retrenchment and dismissal - Employees grievance mechanism - Disciplinary practices - Occupational Health and Safety - Remuneration) Employees (including contractor workers) will be trained at a site level on the requirements of the HR Policy. Policy should provide for auditing and implementation of corrective actions.	Management of labour conditions and risks	EBRD PR 2 ILO Core conventions and standards National Regulations	Project Company Management time Contractors	Prior to Project mobilisation	Project specific HR policy and procedures. Implementation of which will be audited by lenders' advisors on a bi-annual basis during construction and annually during the first 2 years of operation.	
2.2) Undertake an independent Employee Standards Audit on a regular basis to ensure compliance with EBRD PR 2/ IFC PS 2 requirements, ILO and national labour requirements by the Company and by all	Appropriate management of labour risks in the supply chain	EBRD PR2 (ILO standards) National Labour Law	Own resources of Company Contractors	Quarterly Audits during construction and commissioning and annual labour	Labour audit reports- and summary of the issues, actions to be reported as part of	

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	contractors.	Improved human resources practices Compliance with National legislations and PR2 requirements (including core ILO conventions)	International Standards-SA 8000		audits during operations. First Labour Audit to be conducted at within the 1Q after construction started	Lender's E&S reports	
2.3) Ensure that the workers/contractors accommodation (including off site accommodation) to be used for the Project meets the requirements defined in the "IFC/EBRD Workers' Accommodation: Processes and Standards" guidance note.	Management of worker/contractor accommodation risks	EBRD PR2	Company resources Contractor	During construction	Worker/contractor accommodation in line with the requirements prescribed in the "IFC/EBRD Workers' accommodation: processes and standards" guidance note.	
2.4) Establish a formal Employee Grievance Mechanism (EGM) for all direct and contractor employees and provide them information on channels for internal communication and raising grievances. The workers should be informed of the complaint procedure at the time of hire in their local language. As a best practice, options of anonymous grievance mechanism should also be established to encourage concerns to be raised freely.) Register, track and resolve the Complaints in line with the formal EGM at all facilities.) Establish and check key performance	Improved employee/ contractor relationship with management Avoid potential strikes/work stoppages and court cases against the Company	EBRD PR 2 EU/ILO standards) National legislations	Project Company resources Contractors	Prior to project mobilisation	Grievance procedure developed describing the mechanism implemented and maintained.	

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	<p>indicators (metrics) for such tasks as addressing worker grievances (for example, how long it takes to fix a problem and if the same complaint is received repeatedly).</p> <p>) Establish feedback mechanism and procedure regarding the complaints (for example, how long it takes to provide response to complainant, which channel will be used)</p> <p>) Complainants should be consulted about the functioning of the grievance mechanisms and their input solicited for improvements.</p>						
2.5	<p>) Ensure local employment KPIs/targets are achieved by its Contractors through effective monitoring of the contractors, and skill surveys, vocational trainings, and skill development programmes</p>	<p>Optimise the employment opportunities for local people in project affected villages</p> <p>Establishment of good neighbouring relationship with the communities</p>	<p>PR 2 and PR 10 and Labour Management Plan</p> <p>Best practice</p>	<p>Project Company</p> <p>Independent Expert</p>	<p>Skill survey to be done prior to Construction works</p> <p>Achieving the local employment KPIs throughout the construction and operation</p>	<p>Skill survey conducted</p> <ul style="list-style-type: none"> Local employment KPIs reported to the Lenders 	
2.6	<p>For Security Personnel: Include into security policy the following provisions and relevant training on: conflict resolution, crowd management, restraint and cautious exercise of the security activity, proportional use of force (if allowed) and basics of human rights. Keep</p>	<p>Crisis management</p> <p>Reduced security and human rights risks</p>	<p>EBRD PR 2</p> <p>Voluntary Principles on Security and Human Rights</p>	<p>Project Company with assistance from external consultants</p> <p>Contractors</p>	<p>During construction and operations</p>	<p>QHSE Management System must be in place prior to construction beginning on the wind farm.</p> <p>Security Management Plan in line with</p>	

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	records of training sessions.					<p>Voluntary Principles on Security and Human Rights.</p> <p>Inclusion of ICOCA (International Code of Conduct Association) requirement for Private Security Service Providers into the Security contracts.</p> <p>Training Records for security personnel</p> <p>Complaint tracker</p>	
2.7	<p>Selection of Sub- contractors and main suppliers will be done in line the Contractor's Management Plan to integrate EBRD PR 2 requirements (in line with legislations and ILO core conventions) and,</p> <p>) Develop a system for assessing periodically the labour conditions/social compliance of the contractors and core suppliers.</p> <p>) Strictly monitor the overtime hours/ payments and all the other rights of Contractor employees</p>	<p>Integration of social compliance system into supplier evaluation</p> <p>Management of labour risks in the contractors and core suppliers</p>	<p>EBRD PR2</p> <p>National legislation</p>	<p>Project Company</p> <p>Contractor</p>	Prior to project mobilization and implement this throughout the operations	<p>(through integration of PR 2 requirements)</p> <p>Contractor and Supplier assessment records</p> <p>Overtime working procedure for contractors and valuation records</p>	
PR3	Resource Efficiency pollution Prevention and Control						
3.1	Noise modelling of property near turbine 12 to be undertaken If required, appropriate mitigation measures to be developed and	Compliance with International Best Practice and	<p>EBRD PR3</p> <p>World Bank Group: Environmental Health and</p>	Noise specialist to collate baseline data and undertake	Prior to Construction	Development of appropriate management and	

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	included in ESMMP.	National Standards	Safety Guidelines Wind Energy (August 7, 2015)	modelling		mitigation measures for property near T-12 included in ESMMP. Audit of updated findings and associated mitigation and management measures.	
3.2	Implement all monitoring requirements for visual, noise and dust impacts management	Compliance with International Best Practice and National Standards	EBRD PR3 World Bank Group: Environmental Health and Safety Guidelines Wind Energy (August 7, 2015)	Project EHS Lead CLO Contractors	During construction and operation	Reporting against monitoring requirements as specified in the ESMMP, plus ongoing GRM feedback.	
PR4	Health and Safety						
4.1	SEP should be revised to include information on engagement activities with internal (workers) and external stakeholders in relation to community health and safety issues. This should be undertaken for each project phase Communication and coordination will be established with the representatives of the nearby villages and companies having projects in the immediate vicinity of the project for emergency response preparedness	Stakeholder Engagement Community Health and Safety Management	EBRD PR 4	Project Company Management time Contractor's Management Community Liaison Officer	Pre-Construction During Construction During Operation	Development of detailed SEP Audit of SEP and associated internal and external stakeholder meetings (including records of these meetings)	
4.2	The Contractors to have a OHS Management System certified to OHSAS 18001 at the corporate level	Risk of Health and Safety incidents	EBRD PR 4	Contractors	Q4 2018	Record of OHSAS18001 certificate	

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4.3	Ensure Health and Safety performance at the Project site is in line with the policy and international through regular audits and spot checks	Risk of Health and Safety incidents	EBRD PR 4	Project Company Management time Contractors	Ongoing	Health and Safety performance systems and audits in place	
4.4	Develop an Emergency Preparedness and Response Plan for the project which will be disseminated with local community and all contractors in consultation with appropriate authorities.	Risk of Health and Safety incidents	EBRD PR 4	Project Company Management time Contractors	Prior to project mobilisation	Development of Plan disseminated with community members	
PR5	Land Acquisition, Involuntary resettlement and economic displacement						
5.1	<p>Develop and implement Livelihood Restoration and Compensation Plan (which includes concrete actions for livelihood restoration, budget, resources, timeline and monitoring) based on the Livelihood Restoration and Compensation Framework (LRCP) in line with PR5.</p> <p>The LRCP needs to elaborate on the risks of beekeepers' livelihoods. Seasonal beekeepers may not completely be known however the project needs to adapt a communication strategy that will allow for timely and accurate information to be disseminated on the construction activities to avoid any livelihood losses in beekeeping. Needs to link to SEP.</p> <p>In addition, cherry trees associated with land owned at T-12 will be felled and economic displacement will occur. LRCP needs to fully document all impacts and associated</p>	<p>Ensure economic displacement and livelihood impacts are restored</p> <p>To address Stakeholder concerns / and avoid protests.</p>	EBRD PR 5	Project Company Management Time CLO	Q2 2018 and ongoing	<p>Completed and implemented Livelihoods Restoration Plan</p> <p>Quarterly review</p>	

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	compensation for the property at T-12.						
5.2	Undertake Livelihood Restoration completion audit 24 months after LRP implementation	Ensure economic displacement and livelihood impacts are restored	EBRD PR 5	Independent expert	Min 24 months after completion of LRP Implementation	LRP Completion audit report	
5.3	Application to EPDK for downsizing the license area after financial closure	Management of stakeholder concerns/ avoidance of impact on local communities	PR 1- PR 5 and PR 10	Project Company Management Time	Prior Construction	Revised licensed boundaries	
5.4	Avoiding the lands/houses in case of future capacity increase in line with the written commitment of the Project Company to Marmaric community	Management of stakeholder concerns/ avoidance of impact on local communities	PR 1- PR 5 and PR 10	Project Company Management Time	Operations		
5.5	Adopt and implement the Grievance Mechanism. The availability of GRM should be announced and made public, in addition to providing different means of access for certain groups (elderly, women, illiterate)	Stakeholder Concerns / project opposition	EBRD PR 5	Project Company Management Time CLO	Q2 and ongoing	6 monthly review of implementation by qualified auditor (Lender's E&S Advisor).	
PR6	Biodiversity Conservation and Sustainable Management of Living Natural Resources						
6.1	Update ornithological collision risk model with the winter data, and representing data for the spring, summer and autumn, presenting clear calculations of how bird occupancy has been calculated and how the risk window has been	Impacts on biodiversity receptors. Informing adaptive management of	EBRD PR6 Best Practice	Project Company EHS Management Time Biodiversity Specialists	Prior to Project Mobilisation	Revised collision risk model undertaken and findings fed into the BAP. Audit of findings by	

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	calculated. Review existing baseline with distances from nests to turbines for Annex I bird species, and update IA if displacement of nests is predicted. Present in This will be updated in the BAP	biodiversity risks.				suitably qualified specialist (Lender's E&S Advisor)	
6.2	Update the assessment of impacts on critical habitats and priority biodiversity features with the results of the Spring 2018 surveys. This should reflect EBRD guidance, particularly in relation to: whether Annex I habitats should be priority or critical habitat, and the status of KBAs as at least priority biodiversity features and a detailed rationale for not using the whole of the Boz Mountains KBA as the DMU. The residual impacts on critical habitat and priority features should be presented specifically in the BAP, so that the need for offsets or additional conservation actions can be identified and feed into the BAP.	Assessment of impacts on critical habitats and priority biodiversity features. Informing adaptive management of biodiversity risks.	EBRD PR6 Best Practice	Project Company ESH Management Time Biodiversity Specialists	Prior to Project Mobilisation	Critical habitat assessment updated, including results of Spring 2018 surveys. Feed findings in the BAP Audit of findings by suitably qualified specialist. (Lender's E&S Advisor)	
6.3	Revise the BAP following the revision of the CHA. Include section which sets out how the BAP relates to other parts of the ESMMP, overall roles and responsibilities, how the BAP should be implemented. The BAP will be updated and kept as a live document and will include an additional section setting out a consolidated list of the proposed spring surveys More detail needs to be included on intervention points to trigger additional management measures (e.g. how will populations of birds and bats be monitored). The BAP should also be updated with	Informing adaptive management of biodiversity risks.	EBRD PR6 Best Practice	Project Company EHS Management Time Biodiversity Specialists	Prior to Project mobilisation	Update of BAP Lender review Audit / review of updated BAP by suitably qualified specialist (Lender's E&S Advisor)	

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	biodiversity monitoring criteria.						
6.4	Update the assessment of impacts on internationally recognised areas and include in the BAP. The Boz Mountains KBA is an internationally recognised area, and the assessment of impacts should specifically consider impacts on the qualifying features of this site.	Impacts on protected and recognised areas of international and national importance for nature conservation from construction and operation. Informing adaptive management of biodiversity risks.	EBRD PR6 Best Practice	Project Company EHS Management Time Biodiversity Specialists	Prior to Financial Close	Updated assessment of impacts on international recognised areas prepared. Present in the revised BAP if appropriate. Lender review Audit / review of revised BAP by suitably qualified specialist (Lender's E&S Advisor)	
6.5	If invasive species are recorded during spring 2018 surveys an assessment of whether further mitigation measures are required should be undertaken.	Controlling invasive species	EBRD PR6 Best Practice	Project Company EHS Management Time Biodiversity Specialists	Prior to Project mobilisation	Updated alien invasive species assessment and included in the revised BAP. Lender review Audit / review of revised BAP by suitably qualified specialist (Lender's E&S Advisor)	
6.6	Appoint an independent expert to undertake bird and bat monitoring as per the BAP and ESIA requirements.	Impacts on protected species of international and national importance for nature	EBRD PR 6 Best Practice	Project Company Energy Cost	Prior to Construction	Monitoring reports Implementation of Active Turbine Management Plan	

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	Develop and implement an active turbine management plan based on biodiversity surveys.	conservation from construction and operation.			During Operation		
PR 8	Cultural Heritage						
8.1	<p>Undertake cultural heritage field baseline studies at the site identified close to T-9, to provide sufficient detail to review predicated impacts and inform a robust mitigation strategy. This should include assessment of impacts on setting of cultural heritage sites.</p> <p>CH Management Plan to be updated with the outcomes of the survey</p>	Impacts on features of Cultural Heritage	<p>EBRD PR 8</p> <p>International Best Practice (ICOMOS XI'an Declaration on the Conservation of the Setting of Heritage Structures, Sites and Areas, 2005)</p>	<p>Project Company EHS Management Time</p> <p>CH Specialist</p>	Prior to Project Mobilisation	<p>Baseline data Collated</p> <p>Updated and presented CH Management Plan</p> <p>Management and mitigation measures included in updated ESMP and CH Management Plan</p> <p>Audit / review of baseline scope and updated CH Management Plan by suitable qualified specialist (Lender's E&S Advisor)</p>	
8.2	<p>Undertake appropriate cultural heritage consultations with the local community to provide sufficient detail to inform a robust mitigation strategy in regards to the identified site described in 8.1. Include findings in CH Management Plan</p> <p>Local communities to be consulted if sites of cultural heritage (Tangible or Intangible) are to be affected by the project</p>	Impacts on features of Cultural Heritage	EBRD PR 8	<p>Project Company EHS Management Time</p> <p>CH Specialist</p> <p>CLO</p>	<p>Prior to Construction</p> <p>Q2/Q3 2018</p>	Documentation of findings in SEP and CH Management Plan	

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8.3	Review of assessment of proposed construction and operation impacts and develop appropriate mitigation measures. Include in ESMMP and Cultural Heritage Management Plan	Impacts of features of Cultural Heritage	EBRD PR 8 International Best Practice (ICOMOS Xi'an Declaration on the Conservation of the Setting of Heritage Structures, Sites and Areas, 2005)	Project Company EHS Management Time CH Specialist	Prior to Construction	Clear identification and assessment of heritage impacts	
8.4	A chance Find Procedure will be updated. Include further detail on Roles and Responsibilities, Chance Find Process, Monitoring and Reporting Process.	Impacts of features of Cultural Heritage	EBRD PR 8	Project Company EHS Management Time CH Specialist	Prior to Construction /pre groundwork Q2 2018	Creation of a robust Chance Finds Procedure to aid the protection of cultural heritage during construction Audit /review of Chance finds procedure by suitable qualified specialist. (Lender's E&S Advisor)	
PR 10	Information Disclosure and Stakeholder Engagement						
10.1	Adopt and Implement the Project Stakeholder Engagement Plan (SEP). The SEP should be treated as a living document and updated as regularly and as required. SEP to include external grievance mechanism. The effectiveness of the SEP and associated	Appropriate stakeholder engagement and information disclosure and management of stakeholder	EBRD PR 10	Project Company Management and CLO	On going	Project SEP to be adopted immediately and updated quarterly.	

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	<p>practices will be monitored.</p> <p>The Company shall undertake specific measures to engage and consult with vulnerable groups, beekeepers and woman villagers</p>	perceptions and expectations.					
10.2	Develop a project level external communication plan for CSOs/NGOs and Media, with the support of a Public Relationship Manager, and maintain access to environmental and social documents of interest to the public.	Effective communications with interest groups	PR 10	Company resources	2018 and during the lifetime of the WPP	Detailed Communications plan (annual) targeting national level interest groups such as local CSOs/NGOs and media	
10.3	Community Development Plan to be developed and implemented	Additional benefits, management of expectations, support livelihood restoration activities, to gain social licence to operate	PR 10	Company resources External resources	2018 and onwards	Community development plan to be developed and shared with lenders and project affected people	
10.4	Continuous stakeholder engagement and community based participatory / involvement in consultations during construction and operation.	Management of stakeholder perceptions and expectations.	PR 10	Company resources	2018 and during the lifetime of the WPP	Level stakeholder involvement and feedback.	