

Environmental and Social Monitoring Report

Project Number: 52224-001
Annual Report 2020
February 2021

Kazakhstan: Total Eren Access M-KAT Solar Power Project

Prepared by M-KAT Green Limited Liability Partnership for the Asian Development Bank.

This environmental and social monitoring report 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.

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.

M-KAT SOLAR POWER PLANT

ANNUAL ENVIRONMENTAL & SOCIAL REPORT

This report includes the required answers to the questionnaire and the Environmental and Social Action Plan implementation status with the supporting documents numbered according to the action they support.

1. COMPANY DETAILS

Client Name:	M-KAT Green
Client Address:	Kabanbay Batyr Avenue, 15A, Nur-Sultan city, 010000
Country:	The Republic of Kazakhstan
Client authorized representative:	I certify that, to the best of my knowledge and belief, the information contained in this report is true, complete, and correct in all material respects and does not omit any material fact necessary.
Signature:	Thierry Plaisant General Director Date: 23/02/2021
Contact Details:	Telephone: +7 771 110 8239 Mobile: +7 771 110 8239 E-mail: thierry.plaisant@total-eren.com
Reporting Period: 2020	Unless otherwise stated, the information provided below is for this reporting period only.

PART A. CORE QUESTIONS

2. PROJECT UPDATE

Project Name (As given in the Project Legal Documentation):	M-KAT Solar Power Plant
Project OP ID (As given in the Project Legal Documentation):	50025
Please provide a summary update on the project implementation. If the project includes production or manufacturing please also include :	The project is in operation phase

3. ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP) STATUS UPDATE

Using the guidance provided below, please provide an ESAP status update as an attachment to the Annual Environmental & Social Report. Please use the template provided under Annex 1 for the update. The ESAP for the Project is included in the Legal Documentation.

For each ESAP action item, please complete the two steps below and note under the ESAP Status column:

1. Interpret your implementation status using the below guidance:**Exceeding Target (ET):**

The project has gone beyond the requirements of the defined ESAP target and evaluation criteria within the defined timeframe.

Achieved Target (AT):

The project has achieved the ESAP action targets and fulfilled the evaluation criteria within the defined timeframe.

On Target (OT):

The project is on target for achieving ESAP action targets and fulfilling the evaluation criteria within the defined timeframe.

Minor Delay (MD):

The project has not achieved the ESAP action targets within the defined timetable but has put systems, processes or mitigation measure in place, which are working towards addressing the deficiencies within a reasonable timeframe. In such case please specify the new target date.

Significant Delay (SD):

No significant progress has been made towards achieving the ESAP action targets within the defined timeframe. In such case please specify the new target date.

Not Applicable yet (NA):

The defined ESAP action is not applicable yet, e.g., if the project is currently at design stage and the defined ESAP action will be applicable only during the operational stage.

- 2. Comment on implementation status: Provide a brief commentary on the chosen status. For actions with delays or changes, explain the reasons for the delay or changes, actions planned to meet the requirements and estimated completion date for the action. Please note that any material change to the action plan(s) or deadlines agreed with the Bank must be satisfactory to the Bank.**

4. GENERAL

4.1. Have any new environmental, social or gender ¹ issues been identified which were not foreseen by or contemplated in the Environmental and Social Action Plan?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
4.2. Have there been any accidents or incidents that have caused damage to the environment, affected cultural property, or created liabilities for the Client?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
4.3. Have there been any suspensions, closures, penalties, fines and/or corrective action plans imposed by environmental, health and safety, labour authorities on the Company or the Contractors?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
4.4. Have there been any exceedances of the emission and discharge standards that apply to the project (either by regulation or as defined under the ESAP / ESMP/ EU Directives)?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
4.5. Have there been any court cases filed or determined against the Client in the reporting period that are related to labour, health and safety, environment, land acquisition, damage to third party assets, etc.?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>

5. HUMAN RESOURCES MANAGEMENT

Unless otherwise noted, the questions in this section apply to both direct employees and non-employee workers (e.g. contractors and other 3rd party employees working on the project site or performing work directly related to the core functions of the project).

¹ Within the Bank's Environmental and Social Policy, "social" refers to those issues which pertain to project-affected people and their communities and workers and related to socioeconomic status, vulnerability, gender identity, human rights, sexual orientation, cultural heritage, labour and working conditions, health and safety and participation in decision making.

	Total	Recruited in the reporting period	Dismissed in the reporting period
Number of direct employees:	Men: 6 Women: 4	Men: 3 Women: 2	Men: 1 Women: 0
Number of contracted workers:	Men: 77 Women: 8	Men: 77 Women: 8	Men: 0 Women: 0
Number of seasonal/temporary workers:	Direct Employees: Men: Women: 6	Contracted Workers: Men: 31 Women: 6	
Number of employees:	International (%) 2%	National (%) 98%	Local (%) ² 18%
5.1. Were there any collective dismissals as defined in article 1 of EU Directive 98/59 ³ and/or as defined in the national labour code affecting the directly employed workforce during the reporting period?			Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
5.2 Are any collective dismissals planned for the directly employed workforce in the next year?			Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
5.3. Were there any changes to: <ul style="list-style-type: none"> worker representation at Client facilities? status of collective agreements? 			Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
5.4. Have workers raised any grievances concerning the project, Client, or contractors including working conditions or any type of discrimination, harassment or bullying during the reporting period?			Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
5.5 Have there been any strikes or other collective disputes related to working conditions at the Client in the reporting period?			Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>

6. HEALTH AND SAFETY (H&S) DATA

6.1	Please provide information on any accidents / incidents that have happened to employees, contractors or other third parties during the reporting period? Please confirm circumstances, severity of the accident (fatal, serious, minor etc.), status of investigation and remedial action taken. No incident was recorded during 2020.
6.2	Please provide information on the H&S training provided to employees or contractors during the reporting period? Please provide the training topics and the numbers of workers that have been trained. <ul style="list-style-type: none"> The O&M subcontractor (Metka) has organized the following trainings : IOSH Managing Safety courses for the O&M Site Operation Manager and the O&M Site Engineer. Electrical Safety training was completed by 5 Metka employees and 8 HV Subcontractor employees Fire Safety training was completed by 1 Metka employee and 8 HV Subcontractor employees First Aid training was completed by 5 Metka employees and 8 HV Subcontractor employees 3 Emergency Drills conducted by Metka for all staff

² From directly affected/neighbouring communities

³ <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31998L0059&from=EN>

6.3	<p>Please provide information on the number of H&S inspections / audits which have been carried out during the reporting period? Please confirm if these were carried out by the Client or by an independent OSH expert and if any actions are outstanding.</p> <p>The O&M Contractor on behalf of the Client has recruited an HSE Manager to supervise the Total Eren's activities in Kazakhstan and Uzbekistan. The newly appointed HSE manager conducted an H&S audit of the site.</p>
6.4	<p>Major developments and achievements related to H&S management during the reporting period: new safety measures, safety awards / initiatives.</p> <p>The Metka Staff and HV subcontractor have updated their personal electrical, fire, the first aid certificates as required on annual basis.</p>
6.5	<p>Please provide information on the road traffic collisions that have happened to employees or contactors during the reporting period including the number of accidents, fatalities, major injuries, minor injuries, damage only and the investigative process undertaken. Summarise remedial action taken.</p> <p>No road traffic incidents have been recorded during 2020.</p>

7. STAKEHOLDER ENGAGEMENT

<p>7.1 Please provide information on the implementation of the stakeholder engagement plan agreed with the Lenders and summarise interaction with stakeholders during the reporting period, including:</p> <ul style="list-style-type: none"> meeting or other initiatives to engage with members of the public or public organisations, civil society, communities, including vulnerable groups during the report period. Please describe how you have made such meetings and interactions accessible to both men and women of all ages, all social groups, and those who speak minority languages. Summarise any coverage in media on environmental, health and safety and social issues related to the project, and, interaction with any environmental or other community groups. <p>Among the regular meeting with the local officials, the major public event was the site visit of the newly appointed regional governor on July 3 with presence of the regional media.</p> <p>Also the local popular newspaper Shu Dolina continued to disclose the project information to a wider audience by their own initiative. On November 4, 2020 they published an article that the development of a renewable energy source in the Zhambul region is increasing and a lot of work has already been done with photos of MKAT site.</p> <p>Please describe any changes to the Stakeholder Engagement Plan: No changes were made during reporting period.</p>	
<p>7.2 How many complaints or grievances did the project receive from members of the public or civil society organisations during the reporting period? Please split by stakeholder group and by issues and provide status update on % of resolved and unresolved complaints. Summarise main issues raised in the complaints or grievances and explain how they were resolved:</p> <p>No grievance in relation with the Project were received over the period. Nevertheless, the cleaning of the irrigation channel as main request from the local villagers from the project initiation was financed by the Client during the period with 50% of the amount allocated as CSR expenses (see section 12).</p>	
<p>7.3 What information on environmental and social issues was put in the public domain during the reporting period? Please attach a copy or the link.</p> <p>No information on environmental and social issues was put in the public domain during the reporting period. The project NTS, SEP, SEP and ESAP are still present on the Total Eren's website. https://www.total-eren.com/en/m-kat-solar-plant/</p>	
Is the project Categorised A by the EBRD?	No: <input checked="" type="checkbox"/>

PART B QUESTIONS FOR PROJECTS WITH SPECIFIC CONDITIONS

8. WATER USE AND EFFICIENCY

Does the project involve production or manufacturing with a high water demand (greater than 5,000 m ³ /day)?		Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Total volume of water drawn from water source(s) in m ³ during the reporting period	1662 m ³	
Total volume of potable water drawn from water source(s) in m ³ during the reporting period (if available)	400 m ³	
Total units of production/manufacturing (please define the units in the response)	No production	
Water source (well, water network, etc.)	Potable water was brought in tanks from Alga village to O&M building. The security camp at the northern end of the station was supplied with a connection to the Alga municipal water network.	

9. GREENHOUSE GAS (GHG) EMISSIONS

Are the direct and indirect ⁴ GHG emissions of the project more than 25,000 tonnes/year CO ₂ -equivalent?	No: <input checked="" type="checkbox"/>
---	---

10. LAND ACQUISITION

Was there any land acquisition associated with the project during the reporting period? Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/> If yes, please provide answer to the following: -	
Number of communities affected:	None
Number of people affected:	land owners: None land users: None
Have any persons been physically displaced? If yes how many?	None
Permanent land use:	
Temporary land use:	The land of the Northern Compound is in process of registration with the district land department The land of the Southern fiber optic registered for 1 year is in process of renewal. Both titles are expected to be obtained during Q1-2021.
Overall Status of land acquisition:	The compensation for the 5 tenants for the OHL was agreed and paid in July.
Is there a Resettlement Framework/ Resettlement Action and/or Livelihood Restoration Plan (RAP/LRP) developed for the Project?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>

11. GENDER

Is there a Gender Action Plan (GAP) developed for the Project?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
--	--

⁴ Indirect emissions from the grid electricity

12. COMMUNITY DEVELOPMENT

Please summarise the social or community development initiatives undertaken by the Client during the reporting period, and associated expenditure: Comment on whether the community has input into the selection of initiatives to be supported.

The Corporate Social Responsibility Program for the period consists of the cleaning of the village irrigation channel which supplies water to the village private gardens and runs along the northeast side of the site. This channel has the last branch up to the village connected to the regional irrigation system was not cleared for more than 30 years, which has drastically limited the water outflow available for the gardens. After repeated requests from the Alga municipality and directly from the villagers since the project initiation, the Client decided to finance the clearing operation. This operation also benefits to the Client by reducing the risk of overflowing of the Northern compound when the channel is in use during the irrigation season. For this reason, only 50% of the works costs was allocated to the CSRP – 5000 \$ -, the remaining 50% being considered as operational expenses. As agreed with the Alga mayor, the remaining 5000\$ in the annual CRSP budget was not spent and will be carried forward and will be added to the 2021 CSRP budget.

In parallel to the CSRP financed by the Client, Total Eren Services Kazakhstan on behalf of Total Eren SA, the Client's shareholder donated 10 oxygen concentrators valued 5,700,000 KZT to 2 hospitals of the Shu District for supporting the fight against the COVID-19 pandemic.

M-KAT SOLAR POWER PLANT ENVIRONMENTAL AND SOCIAL ACTION PLAN IMPLEMENTATION STATUS

No	Action	Environmental and Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources/Responsibility	Time-frame	Target and Evaluation Criteria for Successful Completion	Implementation status (ET, AT, OT, MD, SD, NA)	Comments on Implementation Status
PR 1. Environmental and Social Appraisal and Management (ADB SR 1. Environment and Social Protection Strategy)								
1.1	<p>Appoint designated Community Liaison Officer and provide to the EHS manager sufficient training in ISO 14001 and 45001 standards to enable her to develop the EHS and Stakeholder Management System and plans for the Project and implement them. Ensure full compliance with national legislation.</p>	Delays in project implementation due to noncompliance with ESAP	EBRD PR1, par.15, best practice ADB SPS SR1	Staff time, training cost/ Top management, Site Manager	a.b. After start of Bank financing or before construction (whichever comes first) c. for the loan duration	<p>a. CLO appointed. Training undertaken</p> <p>b. EHS documentation found adequate by a qualified consultant</p> <p>c. Full compliance with national legislation</p>	AT	<p>a. CLO appointed and trained in 2019</p> <p>b. HSES manager appointed in December, 2020.</p> <p>c. Full compliance with national legislation.</p>
1.2	<p>Include into tender documentation and Contractor's contract a provision on compliance with EBRD and ADB's EHS social and labour protection requirements, and ADB Social Protection Strategy including full compliance with national labour legislation and take measures to comply with ILO's core labour standards.</p> <p>Select contractors that demonstrate adequate capability in EHS and labour management including managing subcontractors.</p> <p>Ask contractors to develop an EHS plan agreeable to the Company before starting any activities.</p> <p>Audit the contractor adherence to the EHS aspects of the contract, ensure timely correction of deviations.</p> <p>Include in Contractor's contract a provision on compliance with national and local labor laws and measures to comply with the core labor standards.</p>	Work delays / Good relations with authorities	EBRD PR1, par.20, ISO 14001, ISO 45001 Kazakh norms (SNiP, SanPiN, GOST), sectoral guidelines, EBRD policy. ADB SPS Prohibited Investment List, ADB SPS,; ADB Social Protection Strategy	-*EPC contractor time/ Legal and procurement dept., EHS manager	During tender packages preparation and construction	<p>EPC Contractor HR policy aligned with the national labour legislation.</p> <p>Tender documents include ESAP requirements. Criteria for assessing contractors EHS and labour management capabilities established. Contractor EHS plan approved by the Company</p>	NA	<p>Compliance with EBRD ESP and national requirements is requested in EPC contract. HSE Plan has been developed.</p> <p>No longer applicable after construction completed</p>

No	Action	Environmental and Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources/Responsibility	Time-frame	Target and Evaluation Criteria for Successful Completion	Implementation status (ET, AT, OT, MD, SD, NA)	Comments on Implementation Status
1.3	To the extent practicably possible obtain from the monocrystalline modules suppliers available information on their suppliers EHS impacts like occurrence of silicosis in quartz miners, silicon furnaces operators working condition, forced labour and worst forms of child labour as well as silicone tetrachloride recycling or disposing practices that prevent hydrochloric acid leachate escape	Risk of exposure to public criticism/Good company image	EBRD PR1 International Labour Organisation conventions 29 and 105 and 182, ADB SPS SR1	None/Site manager	Prior to procurement	Available with the supplier information is obtained	NA	The solar panels supplier EHS report obtained but it described only the plant itself and did not include its suppliers of raw material. As little leverage is available to demand further information, it was considered that no more action was possible. No longer applicable after installation completed
PR 2. Labour and working conditions (ADB SR 1. Environment and ADB Social Protection Strategy)								
2.1	Ensure that contractor and its subcontractors have a worker representative and a human resource policy which is disclosed to workers. Provide one grievance mechanism accessible to all project related workers with the ability to complain anonymously, and include in each answer a roadmap for an unsatisfied worker to take the grievance further.	Risk of work related conflicts and damage to assets / Better worker relations and company image among the local community	EBRD PR2 , par.20, ADB SPS SR1, Best practice	None / EHS manager	Prior to construction	Human resource policies of all involved in the project entities have provision for worker representation and are disclosed. Provision for anonymous complaints have been made and answers contain a roadmap for further complaints.	NA	A worker representative was elected. The grievance handling mechanism was disclosed. All workers have the ability to complain anonymously. No longer applicable after construction completed

No	Action	Environmental and Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources/Responsibility	Time-frame	Target and Evaluation Criteria for Successful Completion	Implementation status (ET, AT, OT, MD, SD, NA)	Comments on Implementation Status
2.2	Produce annual report on implementation of grievance mechanism, types of grievances and resolutions, and compliance with national labor laws and core labor standards. Request the contractor to monitor subcontractors working conditions and timely disbursement of wages by addressing related complaints through grievance handling mechanism		ADB Social Protection Strategy		During construction	Annual report on compliance with labor regulations and standards and grievance mechanism effectiveness in place. Complaints on working conditions and delays in disbursement of wages resolved timely.	NA	Information on implementation of grievance mechanism is provided in this annual report. No separate report prepared because no grievances have been recorded. No longer applicable after construction completed
2.3	Develop Contractor and Suppliers Management Plan applicable to all subcontractors and core suppliers. If temporary accommodation is used, the plan should follow the IFC/EBRD Worker Accommodation Guidelines (Appendix 1) and national sanitary standards.	Good company image	EBRD PR2 IFC/EBRD Worker Accommodation Guidelines ADB SPS SR1		Before EPC contractor is mobilised.	Plan considers the need for worker accommodation and is applied to subcontractors and core suppliers.	AT	The employees of the O&M Contractor, the O&M Subcontractor and the HV substation subcontractor are not accommodated on the site. The security company contracted by the O&M Contractor accommodates up to 40 people (guards, management). The Client has financed the refurbishment and improvements of the accommodation, the canteen and the sanitary facilities made available to the Security Company.
PR 3. Resource Efficiency and Pollution Prevention and Control (ADB SR 1. Environment)								
3.1	Include control of the equipment exhaust excessive smoke in the internal audit checklist	Good company image	EBRD PR 3 RoK legislation,	None/Site Manager	Prior to construction	Control inserted in audit checklist	NA	Control of the equipment exhaust excessive smoke was

No	Action	Environmental and Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources/Responsibility	Time-frame	Target and Evaluation Criteria for Successful Completion	Implementation status (ET, AT, OT, MD, SD, NA)	Comments on Implementation Status
			ADB SPS SR1					included into the HSE inspection checklist. No longer applicable after construction completed
3.2	Develop a waste management plan to include broken solar panels utilization. Request the contractor to provide waste memos to ensure appropriate disposal location and methods, and to include this requirement in the agreement with its subcontractors.	Risk of contamination removed. Valuable components of broken panels utilised	EBRD PR 3, ADB SPS SR1	HSE Manager	1. Prior to the annual preventive maintenance in Autumn	1. Plan uses the reuse-reduce-recycle-recover-safe disposal hierarchy 2. Waste memos available	AT	1. Plan made by Consultant 2. The EPC Contractor contracted a specialized company in utilization of solar panels. Damaged PV Modules were removed from the site by this company in August-September
3.3	Request and control that oil drums are stored on a sheltered and bunded pad. Ensure that contractor controls fuel tank drivers use of trays under refuelling couplings and that places of small repairs of machinery have leakage containment and swapping material	Ground contamination, fines, cost of cleanup.	Best practice	Construction supervisor	During construction	Oil drums containment eliminates leakage risk. Refuelling tank trucks checks and vehicle parking areas checks available.	AT	All fuel tanks have been removed. Mobile machinery is instructed to refuel at the Helios petrol station in Shu. Contract drafted with the Helios to provide a tank truck to refuel heavy machinery on site on request. Waste oil is given to the local shop for regeneration.
3.4	If water is used for panels washing, develop water use reduction plan	Good company image	EBRD PR3	None/Site Manager	Before operation	Water use reduction plan in place and implemented	OT	Panels have not been washed in 2020.
PR 4. Health and Safety (ADB SR 1. Environment)								
4.1	Request the contractor to develop site specific HS plan with identification of risks and to transfer its OHS policy and system requirements to subcontractors through regular HS audits	Work site specifics and risk of rare accidents with severe consequences may be overlooked	ISO 45001, ADB SPS SR1	EHS Manager	Plan before construction, audit records during construction	OHS documentation shows that subcontractors HS performance effectively controlled	AT	All the staff and employees are taken to the HS induction and orientation training. .

No	Action	Environmental and Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources/Responsibility	Time-frame	Target and Evaluation Criteria for Successful Completion	Implementation status (ET, AT, OT, MD, SD, NA)	Comments on Implementation Status
4.2	For all high-risk works, add site specific risk assessments in the local permit-to-work system and enforce register of near misses with their in depth internal analysis For operation stage develop safety provisions for an individual electrician working alone	Risk generated by unusual conditions could be missed by HS instructions Electrocution without quick aid may lead to death or permanent disability	Legislative requirements	EHS Manager	Before operation starts	Permit to work has site specific risk assessment Near misses registered IWA provisions are in place	OT	Permit to work has site specific risk assessment. PTW (Permit to work) was updated by the O&M Subcontractor .
4.3	Ensure that the fire protection belt width is at least 4m at the northern part of the site and 5m at the southern end where grass is thicker and higher. Plough the belt before each summer	Unusually strong ground fire with strong wind may surpass a standard fire protection belt around the site and damage panels	Best practice	Site Manager	Before each summer	No records of ground fire damage to the plant assets	AT	In August 2020, grass was cut along the site perimeter .
4.4	If security guards use firearms, ensure that they know and have on site the instruction for firearms secure storage, handing over and use against vulnerable groups of population	Public unrest, injuries, company image damage, complaints	PR 4 par.17/ Legislative requirements/ EU regulations, ADB SPS SR1	Site Manager	Construction and operation	Instruction available on site and covers all vulnerable groups	AT	Firearms not used. The guards are only equipped with self-defence batons.

No	Action	Environmental and Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources/Responsibility	Time-frame	Target and Evaluation Criteria for Successful Completion	Implementation status (ET, AT, OT, MD, SD, NA)	Comments on Implementation Status
PR 5 Land Acquisition, Involuntary Resettlement and Economic Displacement (ADB SR 2)								
5.1	Prepare Land Acquisition Closure Report including: a. Project summary b. Socio-economic and vulnerability status of 5 displaced persons (DPs) c. Minutes of the meetings/consultations held with DPs d. Entitlement matrix as per PR5 (including legislative requirements) e. Evidence and timing of the payment; f. Conclusions and recommendations: It needs to confirm or otherwise that payments were made in line with PR5 requirements/national laws.	Good company image	PR5 practice Best	None/CLO	Within 2 months after the investment	Closure Report in place and its recommendations followed	AT	LACR was approved by the Lenders. Compensation was paid to the 5 tenants in July
5.2	If panels cleaning is required, consider employing local women and Alga village families which in the course of the CLO monitoring are identified as having been affected by displacement of their cattle from the SPP area	Good company image	PR5 practice Best	Training time/Site manager	During operation	At least 25% of total staff during operations are women. Out of cleaners at least 50% will be women and from Alga village	MD	The 25% target has not been met in 2020. Actions will be agreed with the O&M Subcontractor in order to approach the gender ratio and will be proposed to ADB. Panels have not been washed in 2020.

No	Action	Environmental and Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources/Responsibility	Time-frame	Target and Evaluation Criteria for Successful Completion	Implementation status (ET, AT, OT, MD, SD, NA)	Comments on Implementation Status
PR 6. Biodiversity Conservation and Sustainable Natural Resource Management (ADB SR 1. Environment)								
6.1	Enforce driving along surfaced with chip rock passages and make vehicle parking area as small as possible.	Soil structure damage alters vegetation for long time / Good housekeeping	Best practice	None/Site Manager	During construction	Design and order of construction minimise risk of damage. Subcontractors contracts and performance audit checklist include this requirement.	AT	All the project roads have been surfaced with 8cm chip rock and compacted.
6.2	Monitor vegetation reinstatement at damaged areas and soil for sign of wind erosion. If noted, apply effective erosion abatement measures.	Opportunity to minimise impact missed / good housekeeping	EBRD PR 6/ Best practice, ADB SPS SR1	Recultivation cost/Site Manager	Two vegetative seasons of operation	Monitoring information is inserted in Annual ES Report to EBRD and ADB	NA	No signs of wind erosion are observed after mowing the grass
6.3	Prohibit staff and contractor contact with dead animal corpses, poaching and chasing of animals	Opportunity to minimise impact	Best practice	Site Manager	Prior to and during construction and operations	Prohibition is in the Code of behaviour	AT	Included in site induction. No any finding during the period.
PR 8. Cultural Heritage (ADB SR 1. Environment)								
8.1	a. Check that powerline, ORU and access road construction contractors conduct archaeological surveys b. If archaeological sites are found, consider the line relocation from the sites protection zone. Fence and mark the sites. Inform locals about the sites and their protection status c. If impact on sites is unavoidable exclude sites from the State Protection List, conducting the full detailed archaeological survey and excavation.	Fines and delays due to law violations. Negative public image.	Legislation EBRD PR 6, ADB SPS SR1	None/Site Manager	Before powerline and access road construction starts	a) Archaeological survey by licensed contractor in place b) Design avoids the sites protection zones. Letters to local councils with information on sites available. c) Authorities approve actions for the sites that will be under the project's impact	NA	No longer applicable after construction completed

No	Action	Environmental and Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources/Responsibility	Time-frame	Target and Evaluation Criteria for Successful Completion	Implementation status (ET, AT, OT, MD, SD, NA)	Comments on Implementation Status
	d. Develop and require the earthwork conducting subcontractors to follow the chance find procedures					d) Chance find procedure is in place and adhered to by the subcontractors		
PR 10. Information Disclosure and Stakeholder Engagement (ADB SR 1, SR 2, and SR3)								
10.1	Implement the Stakeholder Engagement Plan with the grievance mechanism and update it annually. Conduct information dissemination and meeting with surrounding stakeholders to increase awareness on the future construction in their area and potential impacts, and availability of grievance procedure if they have any issues/concerns.	Community issues identified and expectations managed	PR 10. – meaningful consultation ADB SPS	Top management / CLO	Before and during construction and operation.	SEP is up to date and implemented in full Grievance records properly maintained.	MD	The information dissemination to the local population was almost impossible due to the sanitary restrictions. Public meetings were forbidden. Regular contacts have been maintained with the Alga mayor and the Shu district administration.
10.2	Provide general public access to information on the E&S performance of the Project and the Company	Large discrepancy between actual and perceived impact / Good company image	Best practice	CLO	During construction and operation.	Information disclosed according to SEP	MD	No information on environmental and social issues was put in the public domain during the reporting period. The project NTS, SEP, SEP and ESAP are still present on the Total Eren's website.
10.3	With Alga Public Governance Council develop and implement a Corporate Social Responsibility Program (CSRP) for the Project and disclose it as per SEP. Allocate and disclose to the Public Governance Council the CSRP budgets (on commissioning and annual). Use the following CSRP actions selection criteria: 1. Action cost fits the allocated to the CSRP budget and accounts for other needs; 2. Action does not overlap with the State programs; 3. Action benefit is sustainable;	Attain Community support and some community benefits from the project.	Best practice EBRD	Top management, CLO	Develop CSRP during construction and implement after operation starts. After commissioning then on-going	Program agreed with stakeholders, disclosed as per SEP and implemented according to schedule	AT	The Corporate Social Responsibility Program for the period consists of the cleaning of the village irrigation channel which supplies water to the village private gardens and runs along the northeast side of the site. This channel has the last branch up to the village connected to the regional irrigation system was not cleared for more than 30 years, which has drastically limited the

No	Action	Environmental and Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources/Responsibility	Time-frame	Target and Evaluation Criteria for Successful Completion	Implementation status (ET, AT, OT, MD, SD, NA)	Comments on Implementation Status
	4. Action benefits the local community and is not biased to a particular group or person.				annual summary of CSRP related actions in annual report			water outflow available for the gardens. After repeated requests from the Alga municipality and directly from the villagers since the project initiation, the Client decided to finance the clearing operation. This operation also benefits to the Client by reducing the risk of overflowing of the Northern compound when the channel is in use during the irrigation season. For this reason, only 50% of the works costs was allocated to the CSRP – 5000 \$ -, the remaining 50% being considered as operational expenses. As agreed with the Alga mayor, the remaining 5000\$ in the annual CRSP budget was not spent and will be carried forward and will be added to the 2021 CSRP budget.
10.4	Report annually on project E&S issues and benefits and implementation of action plans to Lenders and other stakeholders	Ensure transparency on E&S issues	PR 10 – Information disclosure ADB SPS	CLO	Annually throughout Project implementation	Reports provided in time and fully completed. Monitoring reports disclosed	AT	The reports were provided on time.