

Independent review of Ethiopian Railway Project against environmental and social performance standards: Environmental and social action plan

For the purposes of this document, “construction commencing” shall mean [•]

Action Item	Related Standard & Sub-Heading	Action Description	Applicable Lots	Responsible	Documentation/Indicator of Completion	Required completion date
1	IFC PS1 / Policy	Develop and commence implementation of an ERC Environmental and Social (E&S) policy aligned with IFC PS requirements.	All	ERC	a) ERC E&S policy b) Status report on implementation	Prior to construction commencing
2	IFC PS 1 / Management Programmes IFC PS 2 / Occupational Health and Safety, Workers Engaged by Third Parties IFC PS4 / Community Health and Safety	Design and implement an E&S (including health and safety) management system for the Project, for implementation by ERC, the Engineering, Procurement and Construction (EPC) contractors (Yapi Merkezi, referred to as YM) and any sub-contractors employed on the Project during both the Construction and Operation phases. The management system must set out clear standards, tools, and processes to implement the mitigation measures identified as part of the impact assessments, and to respond to local regulatory requirements, the IFC PS, ADB OS and OECD Common Approaches.	All	<ul style="list-style-type: none"> ERC to develop YM and sub-contractors to implement 	E&S (including occupational and community health and safety) management system to include procedures/field manual	Designed prior to construction commencing Implemented during construction and operation
3	IFC PS1 / Identification of Risks and Impacts	Undertake a confirmatory scoping assessment to determine whether any material E&S issues were not included in the scope of the existing ESIA.	All	ESIA Consultants	ESIA Scoping Report	Prior to construction commencing

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4	IFC PS1 / Identification of E&S Risks and Impacts	<p>Undertake supplemental E&S impact assessments to cover:</p> <ul style="list-style-type: none"> • If applicable, those material E&S issues that were not included or were not fully assessed in the scope of the original ESIA (as revealed through the scoping assessment in item 3 above) • The project’s full “area of influence” as determined by IFC PS1 • The project’s route and engineering design, including any designs for access roads, construction camps, rolling stock depots, maintenance depots, and power facilities, as at the date of such assessment. <p>The supplemental impact assessments should include a robust baseline of E&S data (quantified where possible) and assessment of the project’s impacts on this baseline based on impact assessment methodologies that are “consistent with good international industry practice”. See also item 19.</p>	All	ESIA Consultants	<p>a) Supplementary ESIA reports covering at a minimum:</p> <ul style="list-style-type: none"> – Land acquisition, indigenous people, resettlement and cultural heritage (see items 13 and 16) – Public consultation and disclosure – Water resources (see item 10) – Biodiversity and natural resources impacts (see item 14) – Health and safety impacts on local communities <p>b) Map illustrating the “area of influence” to include final route and locations of access roads, construction camps, rolling stock depots, maintenance depots and power facilities</p>	<p>a) Prior to construction commencing provided that the supplemental ESIA reports are updated at the relevant time in line with the timelines stipulated in related Action Items.</p> <p>b) Prior to construction commencing.</p>
5	IFC PS 1 / Management Programmes	Based on the restated ESIA reports and supplemented ESIA referred to in 4 above, determine effective mitigation measures that respond to the identified E&S impacts.	All	ERC, ESIA Consultants	Mitigation measures, detailed within specific management plans to be included in supplementary ESIA reports	Prior to construction commencing

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6	IFC PS 1 / Stakeholder Engagement	Design and implement an on-going stakeholder engagement plan, based on the IFC PS 1 requirements (See IFC Stakeholder Engagement Good Practice Handbook at www.ifc.org) to consult with affected communities on the outcomes of the original ESIA/supplemental ESIA and the proposed E&S management programmes. Establish programmes for ongoing consultation with affected communities during design, construction and operation of the railway.	All	ERC/YM	Stakeholder engagement plan	Prior to construction commencing
7	IFC PS 1 / Organisational Capacity & Competency	Appoint/recruit an E&S specialist(s) for the Project to advise on environmental, health and safety, and social issue management in relation to the IFC PS, local regulations and the efficacy of the proposed E&S mitigation measures / management plans. Ensure that organisational structures are in place (between ERC, YM and any sub-contractors employed on the Project) that allow for E&S requirements for the Project to be incorporated through the design, construction and operational phases. Convene an E&S committee (comprising representatives from ERC, YM and sub-contractors) to meet on a quarterly basis to agree and report on how E&S requirements are incorporated into these phases.	All	ERC / YM / sub-contractors	a) Appointment/recruitment of E&S specialist(s) or engagement of consultants with knowledge and previous experience of IFC PS, local regulations and ESIA mitigation action plans b) YM and ERC organograms showing appointees and reporting lines to Senior Management c) E&S committee Terms of Reference (ToR) and meeting minutes	Prior to construction commencing.

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8	IFC PS 1 / Emergency Preparedness and Response	As part of the supplementary impact assessment, referred to in 3 above identify areas where accidents and emergency situations may occur and develop an appropriate Emergency Preparedness and Response Program as part of the overall management plan.	All	ERC / YM / construction sub-contractors	Emergency Preparedness and Response plan	Prior to construction commencing
9	IFC PS 2 / Labour and Working Conditions	Develop Human Resources policies and practices in line with IFC PS2 (Labour and Working Conditions). These should clarify how the project will manage: a) employment practices and terms, including working hours, wages, overtime, etc.; b) support collective bargaining; c) approach to workers' organisations; d) non-discrimination and equal opportunity (including the equal treatment of migrant and non-migrant labour; e) fair and transparent retrenchment/redundancy; f) child and forced labour practices; g) grievance mechanisms available to workers. These policies should also address the employment rights and conditions of non-employee workers (i.e. sub-contractors) and the quality of accommodation arrangements and services provided (by ERC or construction sub-contractors).	All	<ul style="list-style-type: none"> • ERC to develop policy • ERC, YM and construction sub-contractors to implement 	Human Resources policy incorporating PS 2 referenced requirements (including the prevention of child or forced labour in the primary supply chain) drafted and included in employment contracts for YM and construction sub-contractors	Prior to employment contracting arrangement being finalised

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10	IFC PS3 / Resource Efficiency	<p>As part of the supplemental impact assessment:</p> <p>a) Undertake a robust assessment of the Project’s impact on water resources and those communities that depend on them, and identify measures that can be adopted to minimise the impact on the affected communities.</p> <p>b) Confirm that the annual GHG emissions during the use phase do not exceed the thresholds stipulated by the IFC Standards and EP III (i.e. where combined “Scope 1” and “Scope 2” Emissions are expected to be more than 100,000 tonnes of CO2 equivalent annually. If they do, undertake “alternatives analysis” (as per EP III) and report GHG emissions annually throughout the life of the project).</p>	All	ESIA Consultants	<p>Supplemental ESIA reports to include:</p> <p>a) Water resources impact assessment and evidence of appropriate consultation with local communities</p> <p>b) Assessment of annual GHG emissions during the use phase.</p>	Prior to construction commencing.

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11	IFC PS4 / Security Personnel	As part of the supplemental impact assessments, undertake an assessment of security risks to employees and local communities. Consult affected communities on the use and deployment of security personnel and provide a grievance mechanism for communities and employees to express concerns about security arrangements.	All	ESIA Consultants	Supplemental impact assessment reports to include: a) Security operations impact assessment in compliance with the Voluntary Principles on Security and Human Rights (http://www.voluntaryprinciples.org/what-are-the-voluntary-principles/) b) Evidence of consultation with local communities on the use and deployment of security forces c) Grievance mechanism documented and in place for communities to express concerns about security arrangements and personnel d) Evidence of independent annual review of performance (including grievances received from local communities)	a) to c) Prior to construction commencing d) Annually, starting 12 month from start of construction phase
12	IFC PS 4 / Security Personnel	Security personnel should be recruited, trained and required to act in a manner that is consistent with local laws and regulations and industry good practice standards such as the Voluntary Principles on Security and Human Rights.	All	ERC, YM	a) Human resources policy inclusion b) Security staff personal training records c) Training materials provided showing compliance with requirements of the Voluntary Principles on Security and Human Rights	Prior to construction commencing, during construction and operation

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13	IFC PS 5 / Land Acquisition and Involuntary Resettlement African Development Bank (AfDB) OS2: Involuntary Resettlement, Land acquisition, population displacement and compensation	<p>a) Conduct a baseline assessment of whether any economic or physical displacement of local communities will be caused by the project beyond that identified in the ESIA's</p> <p>b) Develop Resettlement Action Plans for any additional resettlement identified to be required.</p> <p>c) The Resettlement Action Plans should outline mechanisms for efficient and timely compensation, and the ERC's internal organisation to monitor and manage resettlement activities. It should also demonstrate a process of free, prior and informed consent if indigenous people are to be relocated. A grievance mechanism should be in place for resettled parties to express concerns arising from the resettlement process or its implementation.</p> <p>d) Carry out resettlement and compensation based on the approaches outlined in the RAPs, IFC PS5, AfDB OS2, OECD Common Approaches and local regulatory requirements. Consider commissioning an audit of the implemented RAP upon completion, to compare outcomes against desired objectives.</p>	<p>a) 10&11</p> <p>b) 10&11</p> <p>c) All</p> <p>d) All</p>	<p>a) ESIA Consultants</p> <p>b) ESIA Consultants</p> <p>c) ESIA Consultants</p>	<p>a) Supplemental impact assessments to include evidence (not simply assertion) of the existence and extent of displacement caused (e.g. see section 8.3.17 of the Lot 12 ESIA)</p> <p>b) Resettlement Action Plans for any additional resettlement required</p> <p>c) Evidence of grievances reported (e.g. grievance log) and how they were addressed and audit reports assessing the implementation of the RAP</p>	Prior to construction commencing.

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14	IFC PS6 / Biodiversity Conservation and Sustainable Management of Living Natural Resources	As part of the supplemental impact assessment, conduct a detailed assessment of baseline conditions of biodiversity, living natural resources and ecosystems services (quantified, where possible) in line with IFC PS6 requirements and integrate mitigation measures, in line with the “mitigation hierarchy”, into management plan.	10, 11, 13	ESIA Consultants	Supplemental ESIA reports to include: <ul style="list-style-type: none"> • Ecological surveys to establish baseline • Biodiversity impact assessment to identify high conservation value areas and assess the reliance of local communities on ecosystem services 	Prior to construction commencing

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15	IFC PS 7 / Indigenous Peoples	<p>Conduct a baseline assessment using a competent organisation to assess whether indigenous people (as defined by the IFC PS 7) will be affected by the project.</p> <p>If indigenous peoples are expected to be impacted by the Project, ERC should assess the degree and significance of impacts, and consider realistic and cost-effective mitigation measures to avoid such impacts.</p> <p>If the impacts cannot be avoided, minimise and mitigate/compensate for such impacts in a culturally appropriate manner.</p> <p>Indigenous peoples affected by the project should be consulted in line with IFC PS 7, and their free, prior and informed consent should be obtained prior to proceeding with the project, under the specific conditions outlined in IFC PS7.</p> <p>It is recommended that ERC seek specialist advice to document evidence of consultation with such communities and efforts to avoid and minimise impacts.</p> <p>An Indigenous Peoples Development Plan or a broader Community Development Plan with specific considerations may be appropriate.</p>	All	<ul style="list-style-type: none"> • ERC to obtain confirmation and develop plan • YM to implement 	<p>a) Report from a competent organisation (e.g. an indigenous people specialist) providing confirmation of presence or absence of indigenous peoples, to include ,where appropriate, realistic and cost-effective mitigation measure</p> <p>b) Evidence of consultation with indigenous peoples (if relevant)</p> <p>c) Indigenous Peoples Development Engagement Plan (if relevant) or broad Community Development Plan</p>	Prior to construction commencing.

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16	IFC PS8 / Protection of Cultural Heritage in Project Design and Execution	<p>As part of the supplemental ESIA's, undertake a cultural heritage survey for the route of the railway based on "internationally recognised practices for the protection, field-based study, and documentation of cultural heritage".</p> <p>Ensure the ERC Archaeological Chance Finds Procedures are incorporated into the design and construction plans for the railway.</p> <p>Develop a cultural heritage mitigation plan to include the following basic elements: (a) demonstration that mitigation will comply with relevant legislation; (b) evidence that ERC has the capacity/commitment to protect cultural heritage; (c) establishment of consultation processes with affected communities and appropriate experts; and (d) appropriate controls on the removal of cultural heritage.</p>	All	ESIA Consultants	<p>Supplemental ESIA's to include:</p> <ul style="list-style-type: none"> • Archaeological/Cultural Heritage Surveys if any • Environmental and social management plans including ERC Archaeological Chance Finds Procedures if required • Cultural Heritage mitigation plan if required 	Prior to construction commencing
17	African Development Bank (AfDB) OS1 / Gender	As part of the supplemental impact assessment, conduct an assessment of the project's potential impacts on women and how the project can mitigate negative impacts and actively promote gender equality during construction and use phases.	All	ERC	<p>Supplemental ESIA's to include:</p> <ul style="list-style-type: none"> • Gender Impact Assessment • Evidence of consultation with local communities on the impact to women 	Prior to construction commencing

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18	AfDB OS1 / Climate Change Risk	As part of the supplemental impact assessment, conduct an assessment of the project's vulnerability to climate change risk and categorise this according to AfDB criteria.	All	ESIA Consultants	Supplemental ESIA's to include climate change vulnerability assessment	Prior to construction commencing
19	AfDB OS1 / Community consultation	Ensure that stakeholders are consulted in preparing the draft terms of reference for supplemental ESIA's, referred to in 3 above, E&S impact assessment and developing E&S management plans.	All	ERC	Documentation providing evidence of stakeholder consultation activities and outcomes	Prior to construction commencing
20	IFC PS 1 / External Communications and Grievance Mechanism, Ongoing Reporting to Affected Communities	Establish an External Communications and Grievance Mechanism for the use of "Affected Communities" and report on its implementation during both Construction and Operation phases. This should incorporate plans for ongoing reporting to affected communities regarding the progress of implementing mitigation plans. (Please see the Good Practice Note: Addressing Grievances from Project-Affected Communities at www.ifc.org)	All	<ul style="list-style-type: none"> ERC to develop ERC & YM to implement 	External Communications and Grievance Mechanism plan/procedures	To be implemented during construction and operation
21	IFC PS 1 / Monitoring and Review	Monitor and report on the application and effectiveness of E&S management programmes and compliance with other applicable standards and local regulations.	All	<ul style="list-style-type: none"> ERC to develop and monitor YM to implement and monitor 	Regular ongoing monitoring reports	To be implemented during construction and operation