

**Annex 01: Villanueva I & III and Don Jose Solar Projects, Mexico
Environmental and Social Action Plan (ESAP)**

Item No.	Reference	Action Item	Product/Deliverable	Anticipated Completion Date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Environmental and Social Management System (ESMS)	1. Provide a copy of the final ESMS, explicit, detailed and specific for each Sponsor or Project (if different), that includes: (i) the organizational structure, including the roles and responsibilities of the environmental and social, and industrial and occupational health and safety, departments; (ii) the profiles of the personnel in each department (contracted and yet to be contracted); (iii) details of how the system is implemented for the project; (iv) protocols for information management; (v) protocols for decision making; (vi) protocols for the control and monitoring of the implementation of the environmental management actions of the ESMS; (vii) protocols for the evaluation and continuous improvement of the system; and (viii) protocols to ensure the fulfilment of the implementation of the social, environmental, industrial safety and occupational health plans, by the contractors and sub-contractors, of each Project.	1. Copy of the final ESMS for each Sponsor or Project, if different.	1. Before the first disbursement.
1.2	ESHS Policy	1. Provide an Environmental, Social, Health and Safety (ESHS) overarching policy, taking into consideration the context and needs of each Sponsor and/or Project.	1. Copy of ESHS policy for each SPV Sponsor, or each Project, if different.	1. Before the first disbursement.
		2. Each Sponsor should complement its policy with communications and monitoring programs to all members and levels of its organization.	2. Evidence of implementation of the communications and monitoring programs to all members and levels of the organization.	2. Before the first disbursement.
		3. Create a mechanism to measure continuous improvement in policy implementation	3. Mechanism of continuous improvement.	3. Before the first disbursement.

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1.3	Identification and evaluation of environmental and social, risks and impacts	1. Provide the updated Environmental Authorizations for the whole Don Jose SPV Project, with the corresponding titularity and in accordance with the legal procedure required by SEMARNAT.	1. Updated Environmental Authorizations for the whole DN SPV Project.	1. 60 business days after signing the contract.
		2. Continuous update of the environmental and social risk matrix, for each project and each phase.	2. Copy of the updated environmental and social risk matrix.	2. A progress report in each biannual Environmental Compliance Report (ICA).
1.4	Permits and preventive measures of suspension	1. Provide an updated matrix of legal permits and certifications associated with ESHS issues handled by suppliers of the Project, which includes authorizing governmental entity, dates, responsible party or organizational chart and communications and compliance procedures.	1. Copy of the updated matrix of legal permits and certifications of the Project.	1. 30 days after signing the contract and an updated version in each biannual Environmental Compliance Report (ICA)..
1.5	Third Parties E&S Management Plans	1. The EMP of its main contractors, and their commitment mechanism and/or contractual bonds to comply with each Sponsors EMP (or ESMS provided in 1.1), for both the construction and operation phase. This EMP could include the SMP and HSE plans on a single consolidated document or else, these SMP and HSE plans, should be presented separately, for both the construction and operation phase.	1. Copy of the EMP of its main contractors, for the construction phase.	1. 45 days after signing the contract.
			2. Copy of the EMP of its main contractors, for the operation phase.	2. 30 days before the start of the operation phase.
1.6	Organizational Capacity	1. Appoint and maintain for each Project site, throughout construction and operation, a qualified on-site Environmental Manager and an Occupational Health and Safety (OHS) Manager, for each one to report directly to their correspondent Site Manager, with independent reporting lines to Corporate Management. During construction, this may be delegated to	1. Appointment of the designated personnel for each Project, throughout construction and operation.	1. 45 days after signing the contract.

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		owner's engineer or EPC contractor, with oversight by the owner.		
1.7	Emergency Preparedness and Response	2. Provide an updated detailed and site-specific Emergency Preparedness and Response (EPR) Plan, to minimize risk to employees in the case of natural disasters or technological danger (electrocution, etc.), with the contact information of the appropriate and relevant collaborative third parties.	2. Updated, detailed and site-specific EPR Plan, for each Project.	2. 45 days after signing the contract.
1.8	Monitoring and evaluation indicators	1. Develop, or in case they already exist, provide details of the indicators to be monitored and met, in order to measure the effectiveness of the environmental and social management plan and/or the environmental surveillance program, as well as reference to all legal and contractual obligations during the construction and operations phases.	1. List of management and success indicators.	1. 45 days after signing the contract.
1.9	Project Compliance with Applicable Standards	1. Through an Independent Environmental and Social Consultant (IESC), periodically prepare a consolidated report covering environmental, social, health and safety issues and work to provide a status of compliance with the Environmental Sustainability Policy of the IIC, legislation of the Dominican Republic, IDB Environmental and Social Policies, and IFC Performance Standards, including the progress of DIA PMAA's actions, with respect to established indicators.	1. Periodic environmental and social compliance report.	1. Semi-annual during the construction phase and annually onward during the loan term.
1.10	Stakeholder Engagement Plan for the construction phase	1. Provide a copy of the Social Management Plan (SMP) for the construction phase as well as evidence of its implementation. This plan will contemplate ample participation of municipal authorities, key stakeholders and the community in general of each municipality and its district for each Project, in order to present updated and comprehensive information for the construction phase of the project. This Plan should include: (i) Identification of all stakeholders and affected communities that may be interested in the Project; (ii) Include differentiated measures to allow the effective participation of disadvantaged	1. Copy of the Stakeholder Engagement Plan for the construction phase.	1. 45 days after signing the contract.
			2. Copy of the evidence of its implementation.	2. 15 days before the start of the construction phase and subsequently a progress report in each biannual Environmental

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		or vulnerable groups; (iii) Ensure community representatives represent the views of affected communities; (iv) Detail how information is disclosed to stakeholders; (v) Detail the engagement process between affected communities.		Compliance Report (ICA), during the construction phase.
1.11	Stakeholder Engagement Plan for the Operation Phase	1. Update Stakeholder Engagement Plan for the operation phase, which should integrate lessons learned from the construction phase.	1. Copy of the updated Stakeholder Engagement Plan for the operation phase.	1. 90 days before the start of the operation.
1.12	Grievance Mechanism for the construction phase	1. Provide: (i) copies of the internal (direct workers, contractors and sub-contractors) and external Grievance Mechanism (communities and/or owners within the indirect area of influence, with potential impact or interest) for the construction phase; and (ii) copies of the evidences of its implementation. This grievance mechanism should include details of how these complaints are recorded, investigated / evaluated and the follow-up and closure / resolution process.	1. Copies of the Internal and External Grievance Mechanism for the construction phase	1. 45 days after signing the contract.
			2. Copies of the evidences of its implementation	2. Progress report in each biannual Environmental Compliance Report (ICA).
1.13	Grievance Mechanism for the operation phase	1. Provide a similar internal and external Grievance Mechanism (as of the one for construction), for operation.	1. Copies of the Internal and External Grievance Mechanism for operation	1. 90 days before start of operation.
PS 2: Labor and Working Conditions				
2.1	Human Resource Policies and Procedures	1. Provide human resource (HR) policies and procedures of each Sponsor and Project, if different.	1. Copy of the human resource policies and procedures.	1. 45 days after signing the contract.
		2. Develop and implement a policy of gender equality, equal opportunity, non-discrimination including indicators to measure the results of the policy's implementation so as to guarantee that the Project will not discriminate against workers in any aspect of employment relations (principal of equal opportunity and fair treatment) and/or due to his/her gender and that both	2. Copy of the policy of gender equality, equal opportunity, non-discrimination.	2. Before the first disbursement.

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		men and women are benefitting from the positive impacts of the Project.		
2.2	Workers Engaged by Third Parties	1. Provide the policies and procedures for the management and monitoring of the performance of workers hired by third parties.	1. Copy of these policies and procedures.	1. 45 days after signing the contract.
		2. Provide the procedures adopted by the contractors for the hiring and disengagement/retrenchment, of their workers.	2. Copy of these procedures.	2. 45 days after signing the contract.
2.3	Protecting the Workforce	1. Provide an Employment Procedure and evidence of its implementation, in which the hiring and firing conditions and terms, will meet the local and OIT regulation; including, at a minimum, norms/safeguards to avoid child labor and forced labor.	1. Copy of the employment procedure.	1. 45 days after signing the contract.
			2. Copies of the evidences of its implementation.	2. Progress report in each biannual Environmental Compliance Report (ICA).
2.4	Coexistence Manual	1. Provide a coexistence manual (rulebook) for workers, contractors and sub-contractors, of the project.	1. Copy of the coexistence manual (rulebook) for workers, contractors and sub-contractors	1. Before the first disbursement.
2.5	Occupational Health and Safety	1. Provide details of the mechanisms the Sponsors and its contractors need to implement to guarantee a secure working environment and to reduce physical, biological and chemical risks associated with the construction phase of the project and evidence of its implementation. This information will include: i) the identification of possible risks to the health and safety of the workers according to the job that they do; ii) details of the preventative and protective measures implemented, worker trainings, and daily safety briefings mentioned during the site visit and iii) a copy of the reports developed in the event of an incident or occupational accident.	1. Copy of the occupational health and safety, for the construction phase.	1. 45 days after signing the contract.
			2. Copies of the evidences of its implementation.	2. Progress report in each biannual Environmental Compliance Report (ICA).

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2.6	Accidents and fatalities	1. Report any major accidents, including fatalities.	1. Notification of major accidents.	1. Within 24 hours of the occurrence of the accident.
		2. Prepare a root cause analysis and ensure the closure of corrective actions.	2. Copy of the Cause Analysis and closure.	2. Periodic environmental and social compliance report (ref 1.9).
2.7	Supply Chain	1. Provide the policies and procedures for the management and monitoring of the performance, in its primary supply chain	1. Copy of these policies and procedures.	1. 45 days after signing the contract.
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Efficiency in water consumption	1. Provide a water efficiency strategy for the project (analysis of demand, frequency, types of use, measures for efficient use and monitoring). This should include a comparative analysis with water demand from other solar projects in the country and region plus evidence of its implementation.	1. Copy of the water efficiency strategy.	1. Before the first disbursement.
			2. Copies of the evidence of its implementation.	2. Progress report in each biannual Environmental Compliance Report (ICA).
3.2	Air Emissions and Ambient Air Quality	1. Provide a plan for the control of atmospheric emissions and air quality, which includes the air mitigation measures as well as the implementation procedures.	1. Copy of the plan for atmospheric emissions and air quality.	1. 45 days after signing the contract.
			2. Copies of the evidences of its implementation.	2. Progress report in each biannual Environmental Compliance Report (ICA).
3.3	Noise	1. Develop a day-time and night-time baseline noise levels from any identified sensitive receptors during construction and operations, and a monitoring plan to ensure project meets applicable noise limits under national legislation. Noise monitoring plan should be updated based on the outcomes of	1. Copies of the noise levels baseline and the monitoring plan, with additional mitigations, if required	1. 45 days after signing the contract.

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		the grievance mechanism. Additional mitigations to be applied if required following noise monitoring where necessary and defined in ESMP.		
3.4	Hazardous Material Management	1. Provide the Hazardous Material Management registration for both the construction and operation phases of each Sponsor or contractors, for their specific project.	1. Copy of the registration and protocols for the management and disposal of hazardous waste during construction.	1. 45 days after signing the contract.
3.5	Water and Wastewater Treatment	1. Provide an updated erosion control plan and a detailed drainage design, including, appropriate drainage network (collection ponds, drainage, drainage lines properly sized to the appropriate outlets), both surface or underground (crossing roads or infrastructure) with sufficient capacity to avoid flood risk and erosion/sedimentation during rainy seasons, both within the projects properties and of the neighboring land holdings and community.	1. Copy of the erosion control plan and a detailed drainage design.	1. 45 days after signing the contract.
			2. Copies of the evidences of its implementation.	2. Progress report in each biannual Environmental Compliance Report (ICA).
3.6	Pesticide Use and Management	1. Formulate and implement an Integrated Pest Management (IPM) and/or Integrated Vector Management (IVM) approach for pest management activities. This IPM and IVM approach will entail coordinated use of pest and environmental information along with available pest control methods, including cultural practices, biological, genetic and, as a last resort, chemical means to prevent unacceptable levels of pest damage	1. Copy of the Integrated Pest Management (IPM) and/or Integrated Vector Management (IVM).	1. Before the first disbursement.
PS 4: Community Health, Safety, and Security				
4.1	Community Health and Safety	1. Develop a Community Health and Safety (H&S) Management Plan, including where applicable: (i) Infrastructure and equipment safety; (ii) Hazardous materials safety; (iii) Exposure to disease; and (iv) Security measures; as well as the implementation procedures. Assign a Community H&S officer	1. Copy of the Community H&S Management Plan	1. Before the first disbursement.
			2. Copies of the evidences of its implementation.	2. Progress report in each biannual Environmental

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		onsite responsible for preparing and enforcing a Community H&S plan.		Compliance Report (ICA).
		2. Provide a Traffic Impact Management Plan, that should include measures of mitigation of the potential impacts on affected communities, especially during the construction phase, but also including the operation phase and its vehicular composition. This plan is to be documented and communicated as part of the stakeholder engagement procedure.	3. Copy of the Traffic Impacts Management Plan.	3. 45 days after signing the contract.
4.2	Emergency Preparedness and Response (EPRP)	1. Develop a site specific and final EPRP, in which the contacts (name, telephone number, address, etc.) of the main emergency response agencies should be provided.	1. Copy of the specific and final EPRP.	1. 45 days after signing the contract.
		3. Provide a quantitative analysis of risks to local communities during the operational phase.	2. Copy of the analysis and the identified mitigation measures.	2. 45 days before the completion of the construction phase.
		3. Develop and implement an EPRP for the operation phase that includes local communities.	3. Copy of the EPRP for the operation phase.	3. 45 days before the completion of the construction phase.
		4. Provide the results of the monitoring of migratory pressure and options to mitigate impacts to local communities.	4. Copy of the results of the monitoring of migratory pressure	4. Before the first disbursement.
4.3	External security policy and protocols	1. Provide copy of the contract between each Sponsor and the security company or companies to verify, among other aspects, that provisions have been included that permit the client, to: i) carry out reasonable investigations to ensure that security personnel do not have police records, or have been implicated in previous cases of abuse; ii) details of required training regarding use of force; iii) restrictions in the use of firearms; and iv) details of training in environmental awareness.	1. Copy of the contract between each Sponsor and the security company or companies	1. 30 days after signing the contract.

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PS 5: Land Acquisition and Involuntary Resettlement				
5.1	Land Acquisition	1. Provide copies of all the land lease agreements with each landowners of those properties that will be affected by this transmission line for the DJ SPV Project	1. Copies of all the land lease agreements (100% completion of the necessary land)	1. 30 days after signing the contract and before the first disbursement.
PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources				
6.1	Biodiversity Conservation	1. Prepare and implement a biodiversity maintenance and monitoring plan for the operational phase of each Project.	1. Copy of the biodiversity maintenance and monitoring plan for the operational phase.	1. Before the first disbursement.
PS 8: Cultural Heritage				
8.1	Cultural Heritage	1. Develop and implement a chance find procedure for implementation during construction for each Project. Detailed measures should be incorporated into the Construction ESMP.	1. Copy of the Chance Find Procedure, for each Project.	1. 30 days after signing the contract.