

Punta Lomitas Wind Farm – PERU
Environmental and Social Action Plan (ESAP)

No.	Action	Deliverable	Delivery date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts			
1.1	E&S Assessment and Management System		
1.1.1	Update the Environmental and Social Management System (“ESMS”) for the construction phase to include: i) policies; ii) identification of risks and impacts; iii) management programs; iv) organizational capacities and competencies; v) emergency preparedness and response; vi) stakeholder participation; vii) external communications and grievance mechanisms; viii) periodic reports provided to affected communities; and ix) monitoring and assessment.	Updated ESMS for the construction phase.	No later than 60 days after signing the loan agreement.
1.1.2	Implement the ESMS for the construction phase.	Evidence of Implementation.	No later than 90 days after signing the loan agreement and then as part of the Environmental and Social Compliance Report (ESCR).
1.1.3	Update the ESMS for the operation phase.	Updated ESMS for the operation phase.	30 days prior to the start of the operation phase.
1.1.4	Implement the ESMS for the operation phase.	Evidence of Implementation.	As part of the ESCR.
1.2	Policy		
1.2.1	Develop a Community Health and Safety Policy for the Project.	Community Health and Safety Policy.	No later than 45 days after signing the loan agreement.
1.2.2	Implement the Community Health and Safety Policy.	Evidence of adoption.	No later than 60 days after signing the loan agreement and then as part of the ESCR.
1.2.3	Disseminate the Community Health and Safety Policy to the Project’s neighboring communities, contractors, and employees.	Evidence of dissemination of the policy.	No later than 60 days after signing the loan agreement and then as part of the ESCR.
1.2.4	Develop a Human Resources Policy for the Project.	Human Resources Policy for the Project.	No later than 30 days after signing the loan agreement.
1.2.5	Adopt the Human Resources Policy.	Evidence of adoption.	No later than 45 days after signing the loan agreement and then as part of the ESCR.
1.2.6	Disseminate the Human Resources Policy to employees.	Evidence of dissemination.	No later than 60 days after signing the loan agreement and then as part of the ESCR.
1.3	Identification of Risks and Impacts		
1.3.1	Update the hazards, risks and impacts matrix for communities within the Project’s direct area of influence (“DIA”).	Hazards, risks and impacts identification matrix.	No later than 60 days after signing the loan agreement.
1.4	Organizational Capacity and Competency		
1.4.1	Appoint a person responsible for implementing the ESMS and monitoring the environmental and social (“E&S”) performance of contractors and subcontractors, reporting directly to the Project Manager.	Appointment of the person responsible.	No later than 30 days after signing the loan agreement.
1.5	Emergency Preparedness and Response		
1.5.1	Update the Emergency Preparedness and Response Plan to include: i) an assessment of risks associated with transporting Project equipment and materials on the existing route and planned routes; and ii) verification and updating of the communication channels that will be used in the event of an emergency.	Updated Emergency Preparedness and Response Plan.	No later than 60 days after signing the loan agreement.

1.6	Monitoring and Review		
1.6.1	Develop a contractor environmental and social performance management procedure for the construction phase, which includes environmental and social targets and key performance indicators (“KPIs”).	Contractor performance management procedure for the construction phase.	No later than 45 days after signing the loan agreement.
1.6.2	Implement the contractor environmental and social performance management procedure for the construction phase.	Evidence of Implementation.	No later than 45 days after signing the loan agreement and then as part of the ESCR.
1.6.3	Develop a contractor environmental and social performance management procedure for the operation and maintenance (“O&M”) phase, which includes environmental and social targets and key performance indicators (“KPIs”).	Contractor performance management procedure for the operation phase.	No later than 30 days prior to initiation of the O&M phase.
1.6.4	Implement the contractor environmental and social performance management procedure for the operation and maintenance phase.	Evidence of Implementation.	No later than the launch of operations and then as part of the ESCR.
1.6.5	Periodically update the E&S licenses and permits matrix for implementation of the Project activities.	Updated legal E&S compliance matrix.	No later than 60 days after signing the loan agreement and then as part of the ESCR.
1.7	External Communication and Grievance Mechanisms		
1.7.1	Supplement the Citizen Communication and Information Program in the Community Relations Plan (“CRP”) to include: i) external communications management procedures; ii) the external grievance mechanism for receiving queries and grievances from communities (Queries, Grievances, and Complaints Management Procedure); and iii) requirements and frequency of reports that will be provided to communities periodically.	Updated Community Relations Plan.	No later than 60 days after signing the loan agreement.
1.7.2	Implementation of the CRP in accordance with point 1.7.1 above.	Evidence of Implementation.	Periodically as part of the ESCR.
1.7.3	Generate statistics on the use of the external grievance mechanism.	External grievances statistics.	Every 3 months from the date on which the loan agreement is signed during the construction phase, and then in the operation phase as part of the ESCR.
PS 2: Labor and Working Conditions			
2.1	Internal Grievance Mechanism		
2.1.1	Update the existing internal grievance mechanism (ethics hotline) for the Project to ensure that it is applicable to and available for employees and contractors.	Updated internal grievance mechanism.	No later than 60 days after signing the loan agreement.
2.1.2	Adopt the internal grievance mechanism in accordance with point 2.1.1 above.	Evidence of adoption.	No later than 75 days after signing the loan agreement during the construction phase, and then in the operation phase as part of the ESCR.
2.1.3	Provide training to direct employees and key contractors on the use of the internal grievance mechanism.	Evidence that training has been provided.	Periodically in the ESCR.
2.1.4	Generate statistics on grievances received.	Internal grievances statistics.	Every 3 months from the date on which the loan agreement is signed during the construction phase, and then in the operation phase as part of the ESCR.
2.2	Occupational Health and Safety		
2.2.1	Develop a Food Services Provision Procedure which guarantees food safety in construction camps, incorporating monitoring and control actions to verify compliance by contractors.	Food Services Provision Procedure.	No later than 60 days after signing the loan agreement.
2.2.2	Implementation of the Food Services Provision Procedure.	Evidence of Implementation.	Every 3 months from the date on which the loan agreement is signed during the construction phase, and then in the operation phase as part of the ESCR.

2.2.3	Periodically monitor the quality of drinking water for direct employees and contractors.	Monitoring reports.	Every 3 months from the date on which the loan agreement is signed.
2.2.4	Update construction camp facilities to provide recreation and rest areas for direct employees and contractors.	Refurbished construction camp.	No later than 60 days after signing the loan agreement.
2.2.5	Develop a Temporary Accommodation Selection and Requirements Procedure (whether this accommodation is within or outside of the Project site) which includes: i) selection criteria for external accommodation; ii) the minimum conditions (standard) that must be met by the accommodation; iii) the need to generate monthly reports for each site which include the number of employees staying in the accommodation, the name of the contractor which is responsible, etc.; and iv) details of monitoring and control actions.	Temporary Accommodation Selection and Requirements Procedure.	No later than 30 days after signing the loan agreement.
2.2.6	Implement the Temporary Accommodation Selection and Requirements Procedure.	Evidence of adoption.	Periodically as part of the ESCR.
2.2.7	Generate statistics related to the implementation of the Temporary Accommodation Selection and Requirements Procedure.	Temporary accommodation statistics.	Every 3 months from the date on which the loan agreement is signed until the end of the construction phase.
PS 3: Resource Efficiency and Pollution Prevention			
3.1	Resource Efficiency		
3.1.1	Produce an annual greenhouse gas ("GHG") inventory for the Project in the construction phase.	Annual GHG emissions inventory for the construction phase.	At the end of the first year after the loan agreement is signed, and then as part of the ESCR.
3.1.2	Develop a Water Use Monitoring Plan for all Project works.	Water Use Monitoring Plan.	No later than 90 days after signing the loan agreement.
3.1.3	Implement technically viable measures to reduce water use and/or reuse water (primarily in road spraying and concrete mixing activities, and for use in construction camps).	Evidence of Implementation.	Every 3 months from the date on which the loan agreement is signed.
3.1.4	Update the Groundwater Intake Monitoring Plan to ensure that it is in accordance with the permit granted.	Groundwater Intake Monitoring Plan.	No later than 30 days after signing the loan agreement.
3.1.5	Monitor: i) hazardous and non-hazardous solid waste generation and disposal; ii) surplus excavation material that is sent for disposal; iii) concrete waste generation and disposal; iv) domestic and industrial effluents; and vi) fuel, lubricant, and oil use.	Monitoring records.	Every 3 months from the date on which the loan agreement is signed.
3.1.6	Assess alternatives to eliminate, reduce, reuse, or recycle food packaging used by direct employees, contractors, and subcontractors.	Assessment report.	No later than 30 days after signing the loan agreement, and then annually.
3.1.7	Implement the alternatives selected to eliminate, reduce, reuse, or recycle food packaging used by direct employees, contractors, and subcontractors.	Evidence of Implementation.	Periodically as part of the ESCR.
PS 4: Community Health, Safety, and Security			
4.1	Infrastructure and Equipment Design and Safety		
4.1.1	Develop a Traffic Management Plan applicable for existing and alternative access routes which: i) identifies the potential risks associated with the increase in vehicle traffic during the construction phase; and ii) includes procedures to monitor and supervise vehicle entry and exit routes, traffic in densely populated areas, cargo transport frequency and schedules, vehicle conditions, and drivers' health conditions.	Traffic Management Plan.	No later than 30 days after signing the loan agreement.
4.1.2	Implement the Traffic Management Plan.	Evidence of Implementation.	Periodically as part of the ESCR.
4.1.3	Develop a Project Access Control Plan (including the area where the wind farm is connected with the public road system) for individuals not related to the Project.	Access Control Plan for individuals not related to the Project.	Before the 30 days prior to the start of the operation phase.

4.1.4	Implement the Access Control Plan.	Evidence of Implementation.	Periodically in the ESCR.
4.2	Community Exposure to Disease		
4.2.1	Develop a Community Health and Safety Program which includes at least: i) the identification of sensitive communities; ii) the assessment of impacts and risks related to the transportation of personnel, materials, and equipment; iii) preventive and control measures related to air quality and noise levels; and iv) COVID-19 prevention measures and monitoring of cases among contractors' employees.	Community Health and Safety Program.	No later than 30 days after signing the loan agreement.
4.2.2	Implement the Community Health and Safety Program.	Evidence of Implementation.	Periodically as part of the ESCR.
4.2.3	Develop a Community Health and Safety Training Program that includes campaigns for the prevention of: i) infectious diseases, particularly COVID-19; ii) sexually transmitted diseases; iii) inappropriate use of alcohol, tobacco, and drugs; iv) sexual exploitation of children and adolescents; and v) traffic accidents.	Community Health and Safety Training Program.	No later than 60 days after signing the loan agreement.
4.2.4	Implement the Community Health and Safety Training Program.	Evidence of Implementation.	Periodically as part of the ESCR.
4.3	Security Personnel		
4.3.1	Produce a Physical Security Management Manual which includes information on professional ethics and human rights, and incorporates the United Nations' Voluntary Principles on Security and Human Rights.	Physical Security Management Manual.	No later than 60 days after signing the loan agreement.
4.3.2	Provide training to security personnel on human rights issues in accordance with the International Finance Corporation's "Good Practice Handbook: Use of Security Forces: Assessing and Managing Risks and Impacts, Guidance for the Private Sector in Emerging Markets".	Record of training provided.	Every 3 months during the construction phase, and then in the operation phase as part of the ESCR.
PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources			
6.1	Biodiversity Conservation and Sustainable Management of Living Natural Resources		
6.1.1	Update the Bird Monitoring Plan for the O&M phase.	Updated Bird Monitoring Plan for the O&M phase.	30 days prior to the start of the operation phase.
6.1.2	Implement the Bird Monitoring Plan.	Bird monitoring reports.	Periodically as part of the ESCR.
6.1.3	Develop a Bat Monitoring Plan.	Bat Monitoring Plan.	30 days prior to the start of the operation phase.
6.1.4	Implement the Bat Monitoring Plan.	Bat monitoring reports.	Periodically as part of the ESCR.
6.1.5	Adjust the frequency, duration and continuity of bird and bat monitoring campaigns based on the results obtained.	Monitoring campaign reports.	Periodically as part of the ESCR.
6.1.6	Develop an Operations Adaptation Plan based on the results of bird and bat monitoring activities that includes, if appropriate, curtailment procedures and/or shut-down on demand of wind turbines, among other preventive measures.	Operations Adaptation Plan.	Whenever monitoring results demonstrate high levels of bird or bat mortality.
6.1.7	Implementation of the Operations Adaptation Plan (where appropriate).	Evidence of Implementation.	Periodically as part of the ESCR.