

Environmental and Social Action Plan Star Hydro Power Limited

The following are the actions that Star Hydro Power Limited (SHPL) plans to implement in accordance with the *Environmental Impact Assessment and Resettlement Plan: Patrind Hydropower Project* (October 2010) and in line with IFC Performance Standards on Social and Environmental Sustainability (April 30, 2006).

PS	Action	Verification	Timeline
PS1-1	Establish and staff Project Environmental Management and Monitoring Unit (EMU)	TORs of Manager and staff of the EMU; confirmation of hiring of Manager and staff	Prior to first disbursement of IFC financing
PS1-2	Preparation of detailed rehabilitation and landscaping plan for all project construction sites and excavation spoil dumping sites.	Plan and budget.	Six months prior to Project commissioning
PS1-3	Provide periodic updates to the affected communities of progress in completing this Action Plan.	Public notices/communication/ meetings	Quarterly during the construction period as part of a general community liaison activities
PS1-4	Update the Environmental and Social Management Plan (ESMP) for the construction phase (Chapter 9 of the EIA, November 2010) based on the final arrangements with the EPC Contractor, and implement.	Updated ESMP for the construction phase	Prior to start of construction (issuance of EPC contractor's Notice to Proceed).
PS1-5	Update the Environmental and Social Management Plan (ESMP) for the operational phase (Chapter 9 of the EIA, November 2010) based on the final arrangements with the O&M Contractor, and implement.	Updated ESMP for the operational phase	Prior to Project commissioning
PS1-6	Public hearing by Khyber Pakhtunkhwa (KP) EPA and Environmental Approval	Minutes of the public hearing by KP EPA and a copy of the Environmental Approval	Prior to IFC's financial commitment
PS1-7	Submit final arrangement of the electricity transmission from the Project to the NTDC's grid connection point	Summary description of the final arrangement and copy of the EIA for the NTDC's transmission line	To be discussed
PS2-1	SHPL establish and implement HR policies and procedures compliant with IFC PS2 requirements.	HR policies and procedures manual	Prior to first disbursement of IFC financing
PS2-2	Ensure direct and contract employees familiarity with rights	Posting of relevant clauses of applicable labor laws in Urdu in	Prior to start of construction (issuance of

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	and protections under applicable labor laws.	areas where employees and contract workers congregate as confirmed by EMU and Lender's Engineer.	EPC contractor's Notice to Proceed).
PS2-3	Ensure that the construction labor camp has appropriate and adequate accommodations, health and sanitation facilities, cooking and recreation facilities and security for the construction workforce.	A copy of the EPC Contractor's design document; confirmation of EMU and Lender's Engineer.	Prior to start of construction (issuance of EPC contractor's Notice to Proceed).
PS2-4	Ensure standards for labor health and safety (construction and operational phases) are consistent with IFC's Environmental, Health and Safety General Guidelines.	Provisions of EPC and O&M contracts that reference international industry best practice with regard to construction and O&M working conditions and OHS.	EPC contract: prior to first disbursement of IFC financing. O&M contract: prior to start of operations.
PS3-1	Prepare and implement Emergency Response Procedures for construction phase and operational phase	Copies of the Emergency Response Procedures	Prior to start of construction (issuance of EPC contractor's Notice to Proceed), and prior to commissioning of the Project
PS4-1	Prepare and implement a construction traffic management plan.	Plan prepared; training delivered; safeguards in place as reported by EMU and Lender's Engineer.	Prior to start of construction (issuance of EPC contractor's Notice to Proceed).
PS4-2	Develop an Emergency Management Plan covering all contingencies related to Project construction and operations with relevant local authorities.	Plan prepared as confirmed by Project Management/EMU and Lender's Engineer	Prior to first disbursement of IFC financing.
PS4-3	Establish standard operating procedures for alerting local communities about blasting during construction and downstream releases of water from diversion structures during construction and operations.	EMU and Lender's Engineer confirmation	Prior to start of construction (issuance of EPC contractor's Notice to Proceed)
PS5-1	Payment of agreed compensation to all individuals/families directly affected by the Project's permanent or temporary land acquisition.	EMU confirmation of payments	Prior to start of construction (issuance of EPC contractor's Notice to Proceed).

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	Confirm that all individuals/families that have been physically displaced by Project land acquisition have not suffered impairment of their livelihoods.	Follow-up socio-economic study of those individuals/families permanently displaced.	Prior to commissioning of the Project.
PS6-1	Release minimum 2 m ³ /s of water from the weir as Reserved Flow constantly to Kunhar River.	Actual "Reserved Flow" data to be included in the Annual Monitoring Report (AMR) to be submitted to IFC	Annually as part of the AMR
PS6-2	Monitor flow volume of streams flowing into Kunhar River between the weir and Jhelum River confluence and evaluate whether 3.7 m ³ /s of total flow (2 m ³ /s as Reserved Flow, plus 1.7 m ³ /s from downstream streams) as referred to in the November 2010 EIA has been achieved	Estimated total flow data between the weir and Kunhar-Jhelum confluence to be included in the Annual Monitoring Report (AMR) to be submitted to IFC	Annually as part of the AMR
PS6-3	Monitor the Project's impacts on the Kunhar River between the weir and Jhelum River confluence (e.g. fish fauna, water quality, water flow, usage of Kunhar River water, if any, by local villages between the weir and Jhelum River confluence).	Summary evaluation to be included in the Annual Monitoring Report (AMR) to be submitted to IFC	Annually as part of the AMR