

## SECTION D: ENVIRONMENTAL AND SOCIAL CONSTRUCTION MANAGEMENT PLANS

### D18: COMMUNITY HEALTH, SAFETY & SECURITY CONSTRUCTION MANAGEMENT PLAN

#### Contents

<b>18. COMMUNITY HEALTH, SAFETY AND SECURITY MANAGEMENT PLAN .....</b>	<b>2</b>
18.1 INTRODUCTION .....	2
18.2 OBJECTIVES .....	2
18.3 SCOPE .....	2
18.4 SOURCES OF IMPACT .....	3
18.5 PROJECT STANDARDS .....	3
18.5.1 <i>Corporate Policies</i> .....	3
18.5.2 <i>Mongolian Legal Requirements</i> .....	5
18.5.3 <i>International Standards and Conventions</i> .....	6
18.6 MITIGATION MEASURES AND MANAGEMENT CONTROLS .....	8
18.6.1 <i>Risks associated with materials and personnel transport</i> .....	10
18.6.2 <i>Security arrangements and the use of security personnel</i> .....	13
18.6.3 <i>Health issues associated with influx</i> .....	14
18.6.4 <i>Health risks associated with dust, vibration, and noise emissions</i> .....	16
18.6.5 <i>Herder health</i> .....	17
18.6.6 <i>Artisanal miners</i> .....	17
18.6.7 <i>Local economic changes and food security, nutrition and fuel poverty</i> .....	17
18.6.8 <i>Community grievance management</i> .....	18
18.6.9 <i>Community emergency preparedness and response</i> .....	18
18.6.10 <i>Summary of mitigation measures</i> .....	19
18.8 ROLES & RESPONSIBILITIES .....	31
18.9 TRAINING .....	31
18.10 MONITORING AND KEY PERFORMANCE INDICATORS .....	31
18.11 UPDATING THIS PLAN .....	33

#### Tables

Table 18.1: Mitigation Measure, Management Controls and Key Performance Indicators .....	20
Table 18.2: Key Performance Indicators and monitoring actions – Community health, safety and security .....	32

## 18. COMMUNITY HEALTH, SAFETY AND SECURITY MANAGEMENT PLAN

### 18.1 INTRODUCTION

This *Community Health, Safety and Security Management Plan* is designed to ensure that the Oyu Tolgoi Project protects the health, safety and security of people and communities from negative impacts related to the Project within the Project Area of Influence. The Plan addresses the following:

- Direct hazards, risks and impacts stemming from activities under the control of Oyu Tolgoi, including works implemented by Contractors and Subcontractors; and
- Indirect risks and impacts, which are not under the immediate control of Oyu Tolgoi, but to which the Project contributes through its activities and operations.

The Oyu Tolgoi Project is developing a Community Health, Safety & Security Programme (CHSSP) that currently includes herder outreach activities, capacity-building for health services, provision of community assistance in relation to STI<sup>1</sup>/HIV<sup>2</sup> prevention and response, and direct assistance in relation to an emergency response centre. The CHSSP aims to:

- Minimise and mitigate, to the greatest extent possible, health, safety, and security impacts directly and indirectly caused by Oyu Tolgoi operations;
- Measurably improve health service delivery and capacity in the Project Area of Influence; and
- Complement Oyu Tolgoi's existing health, safety and social policies, standards and to extend such standards and practices to local stakeholders.

The core components of the CHSSP are as follows:

- Promoting public awareness through educational training and outreach;
- Improving the capacity of health organisations and professionals; and
- Upgrading health service quality and accessibility.

Detailed terms of reference for the Oyu Tolgoi CHSSP are available through the Communities and Social Performance Department (CSP).

### 18.2 OBJECTIVES

The objectives of this *Community Health, Safety and Security Management Plan* are:

- To outline the applicable standards for health, safety and security requirements;
- To establish effective mechanisms and procedures for protecting local communities in the Oyu Tolgoi Area of Influence, both from direct and indirect Project-related hazards, risks and impacts;
- To define Oyu Tolgoi internal requirements;
- To assign respective roles and responsibilities;
- To define monitoring and reporting procedures; and
- To determine training requirements.

### 18.3 SCOPE

This plan describes the measures to address potential health and safety impacts from Project-related activities on local people and communities within the vicinity of the mine site and the associated facilities, as well as along transport routes and transmission lines used by the Project.

---

<sup>1</sup> STI – Sexually Transmitted Infection

<sup>2</sup> HIV – Human Immunodeficiency Virus

This Plan remains a live document to be reviewed on a periodic basis and updated where necessary changes or new impacts have been identified by means of regular monitoring, community engagement, and information received through the Community Complaints, Disputes and Grievance Procedure (see *Chapter D14: Stakeholder Engagement Plan*). This Plan applies equally to all Oyu Tolgoi personnel, as well as to contractors and subcontractors engaged in Project activities.

Associated Plans, which also incorporate CHSS aspects include *D2: Air Quality Management Plan*, *D12: Hazardous Materials Management Plan*, *D11: Transport Management Plan*, *D19: Worker Health, Safety & Security Management Plan*, and *D20: Emergency Response Plan*.

## 18.4 SOURCES OF IMPACT

The Plan considers impacts related to the health, safety and security of the local population in the Project Area of Influence<sup>3</sup> (i.e. off-site impacts), including the herder community, and residents of Khanbogd *soum*.

Sources of CHSS impacts that this plan seeks to address include the following:

- Transmission of communicable and non-communicable diseases from the workforce to the community;
- Health risks associated with dust, vibration, and noise emissions;
- Risks associated with materials and personnel transport;
- Presence of open excavated areas and trenches (risks associated with active worksites);
- Security arrangements, both in terms of access to the mine site, fencing and associated facilities and the use of security services;
- Conflicts and other unwanted interactions between Oyu Tolgoi personnel and the community;
- Health issues exacerbated by population influx;
- Protection of herder health;
- Health issues associated with artisanal miners;
- Food security and nutrition; and
- Potential for emergencies.

## 18.5 PROJECT STANDARDS

Set out below is an outline of applicable community, health, safety and security standards.

### 18.5.1 Corporate Policies

Oyu Tolgoi has established a number of policies in relation to community health, safety and security. These include the following:

- Urban development and public infrastructure
  - Oyu Tolgoi will make financial and non-financial contributions to local and regional development in the Southern Gobi region, including the planning and development of public infrastructure, health services and social service delivery.
- Community development and social investment
  - Oyu Tolgoi will support community-led development initiatives and projects, with a focus, *inter alia*, on health; and
  - Oyu Tolgoi will support a number of community-based health initiatives and actions as part of its CHSSP.

---

<sup>3</sup> See detailed description of the Project Area of Influence in *Chapter D14: Stakeholder Engagement Plan*.

- Maintaining site safety and conformance with established visitor procedure protocols at Oyu Tolgoi.

The Oyu Tolgoi Project has also developed the *Camp Policy and Code of Behaviour*, which aims to ensure a safe and secure living environment at the Project's workforce accommodation camps. In addition to the specific requirements related to workers residing on the camp premises, the Code contains provisions which contribute to minimising risks that may spread outside the camps and potentially involve the local communities.<sup>4</sup>

Rio Tinto – the strategic partner in the Oyu Tolgoi undertaking – has established a number of standards and policies in place that address community health, safety and security.

Rio Tinto *Communities Standard*<sup>5</sup> includes support to health and livelihood initiatives that address community priorities.

The *Human Rights Guidance* that was developed by Rio Tinto<sup>6</sup> draws on the principles of the United Nations (UN) Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social and Cultural Rights, UN Secretary General's Global Compact, and the Voluntary Principles on Security and Human Rights. Rio Tinto's procedures for using security personnel are based on human rights principles and include guidelines and restrictions on the use of force. These procedures are reinforced through continuous training and applied to contract security personnel as well as to employees. To uphold human rights standards, the procedures ensure the following:

- Careful screening of security guards prior to hiring;
- Security personnel shall respect people's rights as part of their daily conduct. Among other things, this includes avoiding any forms of discrimination, arbitrary interference with any person's privacy; and any inhumane or degrading treatment;
- Security personnel will use force only when strictly necessary and it will always be proportional to lawful objectives; and
- To prevent distrust between Company's operations and local communities as a result of using the security forces, regular consultations with local people, making security procedures publicly available, and properly recording and promptly addressing any complaints related to security personnel are essential.

Training of security personnel is used to reinforce the procedures. All these procedures apply equally to security contractors and are made an explicit condition of business with the Company.

Rio Tinto is a signatory to a host of international commitments and standards and remains dedicated to meeting them. The Company was involved from the inception of the *Voluntary Principles on Security and Human Rights*<sup>7</sup> and has supported these principles since their announcement in 2000. Rio Tinto was also a founding member of the *United Nations Global Compact*<sup>8</sup> (see section 17.5.3 'International Standards and Conventions' below), and is an active member of the UK Network and the Communication on Progress Working Group. Rio Tinto's Communication on Progress is published annually on their website. Further information on Rio Tinto's performance in relation to human rights can be found on the Company's web-site.<sup>9</sup>

---

<sup>4</sup> Under the Policy, any infectious diseases need to be reported; access to the camps by unauthorised personnel is strictly prohibited.

<sup>5</sup> Rio Tinto. Source URL: [http://www.riotinto.com/documents/ReportsPublications/Communities\\_standard.pdf](http://www.riotinto.com/documents/ReportsPublications/Communities_standard.pdf)

<sup>6</sup> Guidance for managers on implementing the human rights policy in 'The Way We Work'. Rio Tinto, October 2003. Source URL: [http://www.riotinto.com/documents/ReportsPublications/corpPub\\_HumanRights.pdf](http://www.riotinto.com/documents/ReportsPublications/corpPub_HumanRights.pdf)

<sup>7</sup> [www.voluntaryprinciples.org](http://www.voluntaryprinciples.org)

<sup>8</sup> [www.unglobalcompact.org](http://www.unglobalcompact.org)

<sup>9</sup> Source URL:

[http://www.riotinto.com/annualreport2008/performance/sustainable\\_dev/governance\\_systems/human\\_rights/index.html](http://www.riotinto.com/annualreport2008/performance/sustainable_dev/governance_systems/human_rights/index.html)

## 18.5.2 Mongolian Legal Requirements

The principal national laws related to community health, safety and security are the *Law on Sanitation* and *Law on Household and Industrial Waste* which is outlined below.

### ***The Law on Sanitation*** (In force from 1 July 1998)

This is a public health law. Its purpose is to ensure the rights of individuals to healthy and safe living and working conditions and to define the rights and duties of individuals and businesses in this regard. This law covers the following:

- supply of drinking and household water;
- control of air quality including dust, smog and pollution;
- soil sanitation, waste disposal, sewage facilities, water holes and lavatories;
- the disposal of hospital waste, radioactive and toxic chemicals;
- the construction of housing and facilities for public use;
- the use of toxic chemicals and ionising rays;
- activities in environments that are noisy or that are impacted by vibration, electromagnetic fields or radiowaves;
- the production and use of foodstuffs; and
- the import of products and technologies.

Duties of business entities under this law include the following:

- Ensuring compliance within their business including training personnel;
- Notifying the inspection agencies of any conditions harmful to human health or the environment;
- To conduct trainings and promotional activities among the employees aimed at meeting sanitary requirements, protecting health, and promoting healthy lifestyle; and
- To organise measures for preventing from infectious diseases.

### ***The Law on Household and Industrial waste*** (In force from 1 July 2004)

The purpose of this Law is to govern relationships related to collection, transportation, storage, and landfill of household and industrial waste and re-using of waste as source of raw materials to prevent from and eliminate hazardous impact of household and industrial wastes on public health and environment.

This law governs relationship related to all types of wastes except for the atmospheric, aquatic environmental and radioactive wastes.

Duties of business entities under this law include the following:

- classify waste depending on the type of own production or services and discharge the sorted waste at designated temporary waste storage sites; correctly report to the state and local administrative bodies the industrial waste generated from their activities;
- observe applicable rules, procedures and standards on waste;
- receive technical assistance and advice on waste management from specialised institutions;
- provide applicable knowledge to their staff on waste sorting and comply with safety standards in their operation;
- enter into contracts with individuals, business entities and organisations holding permit for collection and transportation of waste and ensure the performance of contractual obligations, and
- Individuals, business entities and organisations when constructing, dismantling or repairing buildings in their ownership or possession, shall in advance enter into agreements for collection and transportation of waste and pay applicable fees transfer the waste to be produced to individuals, business entities or organisations holding permit for collection, transportation and land-filling of waste.

Mongolia also enforces health and safety standards that are summarised in *Chapter A2: Policy and Legal Framework*.

### 18.5.3 International Standards and Conventions

The international standards which Oyu Tolgoi will implement are those set by the International Finance Corporation and by EBRD.

#### **International Finance Corporation**

International Finance Corporation (IFC) Performance Standards for Social and Environmental Sustainability set out a range of recommendations with regard to community health, safety and security (**Performance Standard 4**).<sup>10</sup> Oyu Tolgoi will comply with IFC Performance Standard 4.

Key requirements include:

- Evaluation of the risks and impacts of the affected community during the design, construction, operation and decommissioning of the Project;
- Where the Project poses risks to the health, safety and security of communities, an Action Plan will be disclosed on an ongoing basis to enable the community to understand the risks and adverse impacts;
- The design, construction, operation and decommissioning of the Project will be in accordance with good international industry practice. Particular consideration will be given to potential exposure to natural hazards;
- Adverse impacts on soil and groundwater as a result of the Project will also be avoided;
- The transmission of communicable diseases from temporary or permanent labour will be minimised;
- Risks and impacts from Project activities will be assessed and communicated in a culturally appropriate manner. Emergency community situations shall be addressed; and
- Where employees or contractors are retained to provide security, the risks to those inside and outside the Project site will be assessed.

The *World Bank Group Environmental, Health, and Safety Guidelines* include community health, safety and security aspects.<sup>11</sup> The Guidelines address aspects related to:

- Water quality and availability – preventing adverse impacts to the quality and availability of groundwater and surface water resources, and protecting drinking water sources, whether public or private, at all times;
- Structural safety of Project infrastructure – reducing potential hazards posed to the public while accessing Project facilities, and undertaking hazard analysis to identify opportunities to reduce the consequences of a failure or accident;
- Life and fire safety – design, construction and operation of all new buildings accessible to the public in accordance with building codes, fire regulations, legal/insurance requirements, and an internationally accepted Life and Fire Safety (L&FS) standard. Fire prevention, means of egress (design measures that facilitate safe evacuation in case of an emergency), detection and alarm systems, and an emergency response plan are important elements of the life and fire safety provisions;
- Traffic safety – preventing traffic accidents and promoting traffic safety by all Project personnel;

---

<sup>10</sup> International Finance Corporation. *Performance Standards for Social and Environmental Sustainability*; Performance Standard 4: Community Health, Safety and Security. 30 April 2006.

<sup>11</sup> Source URL:

[http://www.ifc.org/ifcext/sustainability.nsf/AttachmentsByTitle/gui\\_EHSGuidelines2007\\_GeneralEHS\\_3/\\$FILE/3+Community+Health+and+Safety.pdf](http://www.ifc.org/ifcext/sustainability.nsf/AttachmentsByTitle/gui_EHSGuidelines2007_GeneralEHS_3/$FILE/3+Community+Health+and+Safety.pdf)

- Transport of hazardous materials – establishing procedures to ensure compliance with local laws and international requirements applicable to the transportation of hazardous materials, as well as measures presented for preventing or minimising the consequences of catastrophic releases of hazardous materials;
- Disease prevention – preventing the occurrence and spread of communicable diseases, including surveillance, active screening and treatment of workers, undertaking health awareness and education initiatives in local communities, and providing health services; and
- Emergency preparedness and response – preparing Emergency Preparedness and Response plans commensurate with the risks of the facility, including provisions for communication systems, community notification, media and agency relations, medical services, etc.

### ***European Bank for Reconstruction and Development***

EBRD Performance Requirement 4 'Community Health, Safety and Security' sets out requirements with regard to community health, safety and security. Oyu Tolgoi will comply with the requirements of EBRD Performance Requirement 4 when implementing its policies.

Key requirements include:

- To identify and evaluate the risks and potential impacts to the health, safety and security of the affected community during the design, construction, operation, and decommissioning of the Project and to establish preventive measures and plans to address them in a manner commensurate with the identified risks and impacts. These measures will favour the prevention or avoidance of risks and impacts over minimisation and reduction;
- Where the Project or stage of the project poses material risks to or potential adverse impacts on the health, safety and security of affected communities, to disclose applicable project-related information to enable the affected communities and relevant government agencies to understand these risks and potential impacts, as well as the proposed prevention, mitigation and emergency response measures, as appropriate;
- To review the measures regularly, and engage the affected communities and agencies on an ongoing basis, informing them on the status of implementation of plans and commitments, results, and discussing with them any material changes needed to the plans, in advance of changes;
- To report on the risks, potential impacts and benefits of the Project and implementation of any action plans on a regular basis (for example, annually) to the EBRD and, as part of reporting to stakeholders in accordance with Performance Requirement 10, to the affected community(ies);
- To design, construct, operate and decommission the structural elements or components of the Project in accordance with good international industry practice, and to give particular consideration to potential exposure to natural hazards, especially where the structural elements are accessible to members of the affected community or where their failure could result in direct or indirect injury to the community;
- To seek to prevent the occurrence of incidents and accidents associated with the operation of vehicles on public roads;
- To exercise commercially reasonable efforts to control the safety of transporting raw materials and of transportation and disposal of wastes, and implement measures to avoid or control community exposure. Information on risk, exposure of population, mitigation measures and monitoring will be provided to the relevant authorities and communicated to the public;
- To avoid or minimise adverse impacts due to project activities on air, soil, water, vegetation and fauna and other natural resources in use by the affected communities;
- To identify those communicable diseases that can be transmitted by the Project components or its workforce (including contractors). Action plans will be developed, where appropriate, to prevent or minimise the potential for worker and community exposure to vector-borne and other communicable diseases that could result from project activities;

- To be prepared to respond to process upset, accidental, and emergency situations in a manner appropriate to the operational risks and the need to prevent their potential negative consequences;
- To identify major-accident hazards, and take all measures necessary to prevent major accidents and limit their consequences for humans and the environment, with a view to ensuring high levels of protection to humans and the environment in a consistent and effective manner;
- To assist and collaborate with the community and the local government agencies in their preparations to respond effectively to emergency situations, especially when their participation and collaboration are necessary to respond to such emergency situations;
- To assess risks to those within and outside the Project site or facilities posed by project security arrangements; and
- To investigate any allegations of unlawful or abusive acts of security personnel, take action (or urge appropriate parties to take action) to prevent recurrence, and report unlawful and abusive acts to public authorities when appropriate.

### ***The Voluntary Principles on Security and Human Rights***

The *Voluntary Principles on Security and Human Rights* (VPs) were introduced in 2000 to provide guidance to extractives companies on maintaining the security of their operations in a manner that respects human rights and fundamental freedoms.<sup>12</sup> The Voluntary Principles fall into three main categories:

- Risk assessment;
- Relations with public security; and
- Relations with private security.

Risk assessment entails the ability to assess the risks present in a company's operating environment in relation to the security of personnel, local communities and assets as well as protection of human rights. In interactions between companies and public security, companies have an interest in ensuring that actions taken by governments, particularly those of public security providers, are consistent with the protection and promotion of human rights. Where private security providers are engaged in protecting a company's personnel or assets, the risk of private security contractors exceeding their authority will be minimised, and respect for and protection human rights have to be promoted.

## **18.6 MITIGATION MEASURES AND MANAGEMENT CONTROLS**

The Oyu Tolgoi Project has developed a range of community health, safety and security procedures to ensure the protection of local communities from negative impacts related to the Project in the Project Area of Influence. The procedures apply to the community itself, together with their properties, assets and livestock.

In 2010, Oyu Tolgoi commissioned a *Community Health Safety and Security Impact Assessment (HIA)*, which was conducted by the Mongolian research consortium Khukh Tenger Khugjil Konsortium (KTKK). The mitigation and management measures described below have been developed in response to the risks identified by Oyu Tolgoi through the HIA. Oyu Tolgoi recognises that the first step in protecting community health and well-being is to protect the health of its workforce. Key commitments are summarised below:

- Medical facilities will be provided to all workers and their families at the site and there will be a dedicated ambulance service for the Project. This will reduce the demand on community health services which are lacking in many basic requirements<sup>13</sup>;
- Medical facilities at the site will not be made available to the local communities in an attempt to reduce the potential for people to migrate to the area in search of health service provision;

---

<sup>12</sup> Source URL: <http://www.voluntaryprinciples.org/principles/introduction>

<sup>13</sup> Health Resources Review (2010) Khukh Tenger Khugjil Konsortium.

- Individual health requirements will be monitored through the *Workers' Personal Health Programme*; and
- Healthy living conditions will be provided for all employees residing on the Oyu Tolgoi site. The Project follows the *IFC/EBRD Guidance on Worker's Accommodation* to ensure healthy living conditions for its workforce. This includes ensuring good standards in general living conditions, drainage, heating, water, sanitation, waste, food preparation and cleanliness, etc.

The *Personal Health Programme* is designed to monitor the health of employees and to educate workers about illness and disease prevention. Under the Programme:

- Employees undertake a fitness-to-work assessment and baseline medical assessment prior to commencing employment;
- Employees and main contractors are given medical examinations;
- Project workers and Contractors who need them are provided with immunisations;
- Health awareness training is provided to all staff, both national and expatriate, and will include awareness-raising on health considerations, including sexually-transmitted illnesses (STIs);
- Health awareness training for workers is conducted at induction and then periodically throughout construction and operations;
- Health awareness materials are provided in the appropriate language and disseminated through CSP's ongoing community engagement process (see Chapter D14: Stakeholder Engagement Plan); and
- Drivers receive additional training in safe driving and health awareness, and shall follow rules regarding the selection and frequency of stopping locations. This category of Project personnel is also subject to special health monitoring in order to ensure their fitness to drive, as well as to trace the incidence of STIs and non-endemic illnesses.

Following the expression of concern by the Oyu Tolgoi management regarding the potential for conflict between Chinese and Mongolian workers at the Oyu Tolgoi Project, the Rio Tinto Global Security and Communities functions were requested to conduct a workforce conflict assessment in late 2010, including the potential impact such conflicts could have on both the Project and the community<sup>14</sup>.

After consultation with various internal and external stakeholders at Oyu Tolgoi and in Ulaanbaatar, the assessment team identified a number of risk areas for which specific mitigation measures would be needed. The output of this process was a revised *Security Response Plan* for Oyu Tolgoi. The Plan addresses:

- Potential conflicts between workers of different nationalities;
- Potential illicit trading activities;
- Potential harassment of female workers;
- Dissension and disruption by opposition groups to the Project;
- Potential organised protests (blockades of transport routes, etc.); and
- Potential violence or unrest between Oyu Tolgoi workers, Oyu Tolgoi security workers and the community.

The health of visitors to the site is also protected through the following commitments:

- Only authorised personnel are permitted to live or stay overnight in worker camps. Visitors must be approved by the Camp Administration to stay on or visit the camp premises;
- Visitors are to be met by their site sponsor at the Camp Administration after check-in;
- All visitors are expected to maintain a high standard of personal hygiene as a part of respectful interaction with fellow residents;

---

<sup>14</sup> Rio Tinto Oyu Tolgoi Project Security Threat Assessment 2010

- No visitor either individually or collectively will approach individuals or groups that are disrupting the peace of the camp, are under the influence of alcohol or are in any way aggressive; and
- Recreation facilities and equipment are available for approved visitors during appropriate hours.

### 18.6.1 Risks associated with materials and personnel transport

The Project has developed a *Transport Management Plan* (see *Chapter D11*) that takes into account transport routes, speeds, times of travel and other safety measures to protect the local community. All transportation will be undertaken along pre-designated routes that have previously been surveyed by Oyu Tolgoi or its Contractors.

Areas where herders and wildlife cross the transportation routes used by Oyu Tolgoi's and contractor vehicles have been identified and appropriate signage will be erected to alert drivers of possible crossings by humans and animals.

Driver training also includes procedures for driving when animals (herd or wild) are observed in proximity to or on a road. This will include training to stop if necessary.

Vehicle speeds on unsealed roads are restricted to a maximum of 80 kph and as low as necessary at sensitive receptor locations (e.g. camp areas and near work sites). All Oyu Tolgoi trucks and those on dedicated contracts will be fitted wherever feasible with satellite tracking devices and speed control, so that driver compliance with the speeds designated by Oyu Tolgoi is enforced. Vehicles will also be fitted with GPS-based speed governors where practicable to limit maximum speeds. Speed limits will be enforced in relation to the location of sensitive receptors, including on-route communities. Contractors will be required to comply with Oyu Tolgoi recommended speed limits and slow down through any community areas.

A number of traffic safety measures are in place to minimise traffic incidents involving people and animals, including:

- Erection of safety signage on roads and the enforcement of speed limits;
- Conducting route surveys to identify communities along the route, conduct building condition assessments and identify accident black spots;
- Implementing rigorous contractor selection processes to minimise risk;
- Implementing rigorous driver training and vehicle inspection programmes for Oyu Tolgoi's and contractors' drivers, together with monitoring the adherence to the requirements covered as part of training;
- Establishing appropriate driving standards, including for night-time and rainy season driving;
- Ensuring that all project vehicles are well-maintained and fitted with safety equipment;
- Permitting only accredited drivers to drive;
- Prohibiting use of a telephone while driving;
- Prohibiting smoking while driving;
- Requiring regular rest breaks on long trips;
- Prohibiting transportation of unauthorised third parties;
- Using speed guns on key Project roads at variable locations;
- Installing Project tags recognisable to the community on Project vehicles;
- Rapid processing of any community complaint related to violation of driving rules or any traffic incidents/accidents;
- Enforcing sanction system if traffic rules violated, which includes removal of Oyu Tolgoi driving accreditation and dismissal; and
- Ensuring that all project vehicles are well-maintained and fitted with safety equipment as appropriate (seat belts, communication devices, reversing alarms, etc).

The above mentioned rules and provisions are equally applicable to Oyu Tolgoi and contractor drivers.

The *Transport Management Plan* includes a *Traffic Awareness Programme* for villages and towns affected by Project-related traffic. Oyu Tolgoi will implement the traffic awareness programme jointly with Project contractors and with participation of the local Police Departments and administrators. The traffic awareness programme will include the following activities:

- Informing affected communities of the potential hazards that could be encountered from increased or altered traffic patterns and volumes on the roads used by Project-related vehicles;
- Implementing a range of practical education activities, demonstrations and other events to help the residents avoid traffic accidents and incidents;
- Tailoring its activities to meet the needs of the different communities affected along the transport route (e.g. different training may be required for towns closer to the Oyu Tolgoi site such as Khanbogd since they may be used to higher volumes of truck traffic, whereas rural and herder communities are likely to require more intensive awareness raising efforts);
- Consideration will be given to targeting different sections of the population that may be affected by increased traffic, particularly children, youth and the elderly; and
- Proper notification will be provided to affected communities well in advance of training dates to ensure maximum participation.

The *Traffic Awareness Programme* links in with the *Road Traffic Injury Prevention Plan* which is part of the *Community Health Safety and Security Programme*. Further details on the mitigation and management measures are provided in *Chapter D11: Transport Management Plan*.

### **Incident reporting**

Any accident involving an Oyu Tolgoi vehicle will be reported directly through Oyu Tolgoi's Emergency Dispatch unit which will coordinate the follow up response. Emergency Dispatch will coordinate with the SOS Clinic on the Oyu Tolgoi site to send an ambulance if necessary. Dispatch will also notify the Safety and Security departments, which will send personnel to the site whether medical assistance is needed or not. This will happen whether the accident involves an Oyu Tolgoi vehicle or a local vehicle; in both cases, Security will inform the local police to attend. The Oyu Tolgoi Head of Safety will then prepare an Incident Report.

Accidents that do not involve Oyu Tolgoi personnel or vehicles are not reported through the Oyu Tolgoi system. Occasionally, Oyu Tolgoi is requested to provide the use of its ambulance and medical assistance for local accidents. As the point of contact with the community, the Communities and Social Performance Department may facilitate this request. The Senior Manager – Camp & Site Services will determine if SOS will assist, which it usually does.

In the case of accidents with animals, vehicular or otherwise, the Communities and Social Performance Department works with the local veterinarian to determine the cause of death. If Oyu Tolgoi is responsible, CSP will engage the owner through the Community Complaint Management Procedure and will negotiate appropriate compensation. Accidents involving any environmental damage will be handled according to the applicable environment management procedures, such as those for a chemical spill.

Risks associated with active work sites

### **Access control**

Most hazardous work (such as heavy construction activities, blasting, mining, haulage of ore, and storage of hazardous chemicals or machinery) takes place within the Mine Licence Area fence. This area is controlled by the gates and security personnel at checkpoints all times, thereby preventing the access of unauthorised third parties.

A "security zone" has been established around the Mine Licence Area which limits access to the Project site as well as other land outside the site as defined by the Mongolian Government. The following requirements are enforced to ensure that site access is properly controlled:

- A high security fence will be erected around 'high risk' mine facilities including the mill and crusher areas;
- A staffed security gate and personnel identification system is implemented by Oyu Tolgoi to control site access;

- All site activities will continue to be clearly demarcated where fencing is not required to ensure that they are safe, visible and illuminated (such as drilling activities and road, water and power line construction);
- Where roads or other access routes cross site activity areas, the Project will be responsible for providing and maintaining safe diversions, temporary bridges, traffic controls, barricades, signs and warning lights as may be required;
- All crossings of tracks and roads will be reinstated on completion of activities;
- Stockproof fencing will be erected in areas of danger for livestock and the community relations team will agree areas for fencing with relevant communities and livestock owners;
- Watchmen are employed to survey the Project construction sites and night-time vehicle storage areas and they will continue to discourage public infringement onto all Project sites;
- Recruitment will continue to only take place at designated recruitment centres and not via informal requests for or approaches by members of the public either at the construction camp or along the route to assist in reducing potential for the public coming to the site in search of work; and
- All goods and equipment required for the Project will continue to only be purchased through formal routes. This will be publicised around the community and in regional areas (to minimise the potential for 'hawking', i.e. attempting to sell things informally, around the site boundary).

Contractors in charge of the works will implement the following measures:

- Temporary fencing with access control where required, particularly wherever potentially hazardous machinery or materials are temporarily stored for construction purposes outside of the Mine Licence Area;
- No trench, pit or excavated area will be left open for any longer than is operationally necessary;
- No trench, pit or excavated area will be left open unless it is clearly signposted as a hazard in appropriate languages, is equipped with the proper means of egress, and/or watched by the responsible personnel at all times;
- No live wires will be left outside of the Mine Licence Area fence, unless clearly demarcated as a hazard and watched at all times;
- No cables are left on the ground outside of the Mine Licence Area fence; and
- No stockpiling of pipes, cables, or other construction materials unless within the fenced and watched area and safely and reliably fixed.

Oyu Tolgoi and its contractors will ensure that:

- All construction activities will take place in designated, demarcated areas. Access will be limited to construction sites through fencing and security personnel wherever necessary;
- A 2.5m chain-link security fence and security personnel are in place to monitor ingress and egress at the Mine Licence Area and airport sites. Regular inspections of fencing will be undertaken to ensure that no unauthorised access is possible and that no animals are trapped;
- Construction camps will be sited in areas away from herder winter shelters, wherever possible, and access to and from the camps will be controlled;
- Access routes and crossing points for herders and livestock will be identified wherever needed at construction sites, i.e. water pipeline, transmission line, and Oyu Tolgoi to Gashuun Sukhait road. Designated animal and people crossings will be clearly visible and signposted during construction activities; these safety features are an integral part of the Oyu Tolgoi to Gashuun Sukhait road design and have been developed in consultation with the *soum* community;
- Rural and *soum* centre residents in Khanbogd will be sensitised to construction safety risks. This includes community safety briefings related to the movement of heavy equipment, open trenches and other construction activities;
- Community relations staff in Khanbogd will provide regular information to local residents about changing Project activities, including any new potential hazards and how to avoid them;

- Access to the site and egress from the site is strictly controlled through the use of the gatehouses (north and south);
- Spot checks at construction sites to ensure safe on-site and off-site work practices are being implemented;
- Dust suppression measures are being implemented to minimise impacts to local communities and nearby land users;
- Noise suppression measures will be taken, including the use of noise berms, routine and ongoing equipment maintenance, equipment location and orientation and control of working hours;
- Sediment prevention measures are in place during construction to limit any impacts to alluvial water abstraction; and
- Equipment is secured appropriately overnight and night security and storage measures are being implemented (e.g. organic waste removed, night watchmen employed, lighting over construction sites).

This will be the responsibility of the Health and Safety Department and CSP as well as the construction contractors.

### **18.6.2 Security arrangements and the use of security personnel**

Oyu Tolgoi has conducted the applicable assessments as required by the Mongolian Law and applies applicable standards to any individual or company it sub-contracts, including the standards stipulated in *the Voluntary Principles on Security and Human Rights*, *Security Personnel Requirements* of the IFC Performance Standard 4 and the EBRD's Performance Requirement 4.

To this effect, Oyu Tolgoi has developed and adopted a standard that describes the minimum requirements for all personnel, contractors and sub-contractors related to security arrangements and the use of force.

This security standard is designed to help the Company to protect its people and assets in a way that minimises conflict and respects the human rights of its stakeholders. The security standard is as follows:

- Oyu Tolgoi will carry out risk assessments in relation to security issues at each of its Project sites;
- Oyu Tolgoi will use its Security Plan in order to prevent or mitigate any threats identified in its risk assessment. The Security Plan determines how security personnel can be deployed at the Project sites;
- The objective of the Security Plan is to ensure that security is deployed in a way that respects and protects human dignity and human rights, avoids creating conflict and addresses security threats in as peaceful a way as possible;
- Oyu Tolgoi will therefore seek to ensure that force is a last resort and is used in a way that minimizes damage and injury, and respects and preserves human life;
- Oyu Tolgoi will only use armed guards where the above risk assessment determines that this is the only way to mitigate the risks identified or where it is required by law; and
- Force will only be used for preventive and defensive purposes in proportion to the nature and extent of the threat.

Accordingly, Oyu Tolgoi's security personnel are required to:

- First try to resolve any security incidents without using force;
- Only use the minimum force needed if this fails;
- Security personnel must ensure that medical aid is given to anybody injured in any incident at the earliest possible moment;
- A community complaints process is in place to allow the local community to express concerns about the security arrangements and acts of Oyu Tolgoi security personnel;

- Oyu Tolgoi will investigate any credible allegations of unlawful or abusive acts of its security personnel, take action to prevent recurrence, and report unlawful and abusive acts to public authorities when appropriate;
- Where Oyu Tolgoi uses public or government security services to protect its operations, they must guarantee that existing international guidelines and standards for the use of force are respected;
- Oyu Tolgoi will conduct due diligence on security providers to avoid retaining the services of any group or individual that has previously been responsible for violations of human rights or humanitarian law;
- Oyu Tolgoi will provide training regarding the use of force (and where applicable, firearms) and appropriate conduct toward workers and the local community, and will monitor the adherence to ensure that security personnel abide by this standard; and
- Oyu Tolgoi will never knowingly place or pressure employees to work in areas of high risk to personal security.

For reference purposes, this standard is compatible with the current *Voluntary Principles on Security and Human Rights* and the *Security Personnel Requirements* of the IFC Performance Standard 4 and the EBRD's Performance Requirement 4 (as outlined in section 18.5.3 'International Standards and Conventions' of this Plan).

A security plan was developed by internal consultants from Rio Tinto Group Security after visits to the Oyu Tolgoi site and Ulaanbaatar in September 2010 and January 2011. An operational readiness plan for Security that includes security issues both at the Oyu Tolgoi site and Offices and expatriate security in Ulaanbaatar is being completed.

The *Community Grievance Procedure* is used to record, monitor and respond to any issues raised by the local communities in relation to the actions and conduct of the security personnel, as well as behaviour of any member of the Project workforce (see also *Chapter D14: Stakeholder Engagement Plan* for detailed information on the community grievance mechanism).

Oyu Tolgoi commits to coordinating with the South Gobi Provincial Administration and to maintain dialogue with the Mongolian military about their current activities and future plans for national security measures in the region, particularly along the border with China.

### 18.6.3 Health issues associated with influx

#### ***Increase risk of disease***

Oyu Tolgoi is aware of the risk of an increase in communicable diseases due to the Project-induced immigration and population influx, the formation of 'camp follower' groups (as described in *Chapter C8: Population and Influx*), the use of foreign workforce for Project construction and operations, and regular long-haul freight transportations to and from China, which may result in the import of endemic and non-endemic infectious illnesses and may also facilitate the interface between truck drivers and commercial sex workers.

Communicable diseases of concern in Mongolia include tuberculosis, sexually transmitted infections (STIs) and brucellosis (as cited in *Chapter B13: Community Health, Safety and Security*). Risk of respiratory disease, as well as food and water-borne diseases (such as cholera and typhoid) may also increase in informal migrant settlements due to congested living conditions and a lack of sanitary facilities. Specific risk prevention measures are as follows:

- Medical services and comprehensive worker health screening is in place for all workers. All Project workers are subject to regular health checks;
- A comprehensive STI/HIV prevention and awareness programme is being implemented to protect workers and their families, as well as the provision of voluntary testing services. Condoms are available in the camps, free of charge from the medical personnel;
- Healthy workforce policies are being implemented to encourage workers to adopt safe sexual and other health-related practices (e.g. hand and food hygiene) as part of the *Workers' Personal Health Programme*;

- Vaccinations for workers and their families are provided for applicable communicable diseases in accordance with risks identified by Project medical staff;
- Health promotion to herders, youths and high risk groups includes offering the same STI/HIV awareness programme and preventative measures to local communities. The approach is regional and is focused on Khanbogd, Bayan Ovoo, Manlai and Dalanzadgad *soums*;
- Oyu Tolgoi is working with the Mongolian Ministry of Health (MoH) and local government to strengthen national control programmes for the most prevalent communicable diseases in the local *soums*;
- Investments in the local medical facilities and services are being made by Oyu Tolgoi. These will include contributing to the improvement of *soum* and *aimag* health facilities, funding training for family planning and sexual health services and counselling, and providing additional equipment for testing, monitoring and treatment of the most prevalent communicable diseases;
- Oyu Tolgoi will partner with local government to promote immunisation within the local community and particularly among children;
- Epidemiological surveillance and monitoring of community health will be accomplished through local and regional health clinics and service providers. Oyu Tolgoi recognises that current health services are stretched and that investment is needed to support these services, therefore it will consult with the relevant stakeholders and agencies to identify areas of potential investment and assistance;
- As part of the Company's participation in the Southern Gobi Regional Development Council, the Project will contribute to the improvement of health care infrastructure in the Project Area of Influence; and
- Through the CHSSP, the Project will also support health service provision, including diagnostics and surveillance. A *Communicable Diseases Prevention Action Plan* is included as part of the CHSSP.

Changes in lifestyle as a direct consequence of the Project are likely to lead in changes in the incidence of lifestyle related non-communicable diseases. Non-communicable diseases are those which are not passed on from person to person, and include diabetes, hypertension, obesity, some cancers, and alcohol and drug related health problems.

Oyu Tolgoi, led by CSP, is committed to developing a range of health promotion related activities within the community to minimise expected increases in lifestyle related disease. These are focussed on healthy nutrition, physical activity, tobacco, alcohol and stress. A *Non-Communicable Diseases Prevention Action Plan* is included as part of the CHSSP.

*Health awareness work* aims to minimise both the direct and indirect impacts of mine operations on local communities. Oyu Tolgoi is committed to the following:

- The Community Relations Officers (CROs) will provide education sessions in every community potentially affected by health, safety and security hazards related to the Project;
- Awareness-raising education and outreach events will be facilitated by Oyu Tolgoi on health issues, particularly communicable diseases, for communities close to the mine site;
- Oyu Tolgoi will work with local Health Departments and administrators;
- Relevant contractors will be expected to participate in some health awareness events with local communities during the construction phase; and
- Printed materials including posters, leaflets and other documents will be prepared and disseminated through health clinics, community meetings and at the Oyu Tolgoi offices in Khanbogd, Manlai, Bayan Ovoo and Dalanzadgad.

The main focus of these awareness-raising activities is on familiarising the local communities with the main health hazards that may be attributable to the Project and construction and operations works, the prevention of transmissible illnesses, and aspects of healthy living.

An *Individual/Community Empowerment Action Plan* is included as part of the *Community Health Safety and Security Programme*. This Plan aims to train a group of trainers who will then be able to pass on knowledge in relation to access to health care and healthy living.

### **Increased pressure on health services**

Khanbogd *soum* is serviced by a single government hospital located in the *soum* centre. There is also an International SOS clinic for mine workers based on the Oyu Tolgoi mine site. The level of health service provision is relatively poor compared with international standards, but is higher than the neighbouring districts of Bayan-Ovoo and Manlai. There are challenges in terms of access of the rural population to general health care and to specialist health care provision such as dental, obstetric and maternity care. Although life expectancy at birth has risen (from 62.8 in 1992 to 67.2 in 2008), the incidence of communicable diseases has also risen, as have 'trauma', accidents and violence-related illness and injury. Combined with a rapidly growing population (4.2% p.a.) and predicted high levels of influx, there will be considerable pressure on the *soum* health services to meet demand.<sup>15</sup> Oyu Tolgoi is facilitating a multi-stakeholder public private partnership in order to improve the delivery of health programmes in the Project impact areas. The company also undertakes health promotion work in the Project Area and facilitates a health systems strengthening programme through the Mongolian Ministry of Health.

### **Community safety**

A major change to the Oyu Tolgoi impact communities is the movement of population. The net effect of this is increases to the population of Khanbogd. These changes are expected to impact social cohesion and stability, and may contribute to an increased risk of crime, especially robbery. Mitigation measures for these potential impacts on community security include the *Influx Management Plan*, the *Regional Development Plan*, the *Environmental Management Plan*, the *Oyu Tolgoi HSES Monitoring Programme* and the *Security Response Plan*.

## **18.6.4 Health risks associated with dust, vibration, and noise emissions**

### **Dust Emissions**

Construction activities and increased traffic on roads will contribute to dust levels in and around the Oyu Tolgoi active site areas. It is recognized that high dust levels can contribute to respiratory disease. To minimise the increase in dust levels Oyu Tolgoi will upgrade and seal the road from Oyu Tolgoi to Gashuun Sukhait. This will provide a designated route for the road and minimise any off-road driving, hence dust emissions. The road will be suitable for the safe operation of the predicted traffic volumes and the size of trucks. Oyu Tolgoi will also contribute to the maintenance of other roads that are heavily used by the Project such as the road from Oyu Tolgoi to Khanbogd. For specific dust control mitigation measures, see *Chapter D2: Atmospheric Emissions Management Plan*.

### **Noise Emissions Associated with Blasting**

In order to minimise effects to local communities and wildlife as a result of blasting activities, the following provisions will be made:

- Oyu Tolgoi will obtain approval from relevant local authorities for the transportation, storage and use of explosives;
- Shot firers and other personnel using explosives must be licensed and appropriately trained for their duties;
- Times for blasting will be selected when the community is least sensitive to blasting impacts (e.g. day time hours);
- Information will be provided to local communities advising on how the blasting activities will proceed;
- The local population along construction routes shall be warned well in advance with dates and times of blasting so that they have the opportunity to move livestock otherwise prepare;

---

<sup>15</sup> Influx Assessment Report 2007

- Warning signs and security staff will be put into place to ensure the safety of the local population during blasting;
- An audible pre-warning shall be given immediately before each blast or series of blasts; and
- Approved blasting practices shall be followed at all times.

### 18.6.5 Herder health<sup>16</sup>

Mine-related development activities such as the construction of roads, traffic and other construction on their land and changed land use patterns can have an impact on herders. The HIA Field Study found that traffic noise, along with the vibration of heavily laden trucks and associated dust, can be a source of irritation and stress amongst herders living near traffic routes. The expanding unofficial road network is degrading herder pasturelands. The perception is that accidents are increasing, and people and livestock may be injured or die in holes dug and left by road building crews. Theft was almost never an issue in the past, and herders never locked anything, yet now there is increased contact with strangers. Herders who resettle to find work experience the challenges of childcare, work rosters and family stress. Increased worry and stress is reportedly leading to higher levels of alcohol consumption.

The Field Study found that concerns about water availability and quality was also a problem raised by herders, affecting both community hygiene and capacity to maintain herd populations. There are also concerns that the hardness of some water used domestically contributes to kidney disease.

Oyu Tolgoi will continue to monitor issues of herder health as part of the Herder Outreach Programme and the Healthy Soums Programme. The programmes offer health information to herders which would otherwise not be available. A range of organisations have responsibility for the health of local residents including national and local government, and local NGOs.

### 18.6.6 Artisanal miners<sup>17</sup>

Artisanal mining has been associated with some adverse health impacts. Particular concerns have been expressed about the miners' use of mercury in the amalgamation process and of the health risks associated with roasting the amalgam to extract gold. Although there is no artisanal mining practiced in the Oyu Tolgoi Project direct impact area, and the Mongolian government closed down all illegal mining in the region in 2007, there has historically been some informal practising of artisanal mining in neighbouring provinces to supplement local incomes, which requires consideration.

Other social problems associated with artisanal mining in *ger* settlements include alcohol and drug abuse.

The South Gobi *aimag* Director of Health highlighted artisanal miners as a past and potential future drain on Khanbogd *soum* health budgets. The Khanbogd medical clinic has been required to treat a large number of trauma injuries resulting from artisanal mining activities. The clinic is not equipped to treat such injuries and has used a substantial part of its annual operating budget in transporting victims to Dalanzadgad Hospital, which is 250 km away. Because many of the victims are not registered in Khanbogd *soum*, the *soum* does not receive any revenue benefit from their presence. Funds meant for treatment of Khanbogd residents are thus effectively diverted to informal miners. The health of artisanal miners has become less of an issue in recent years as the numbers have declined. Nevertheless Oyu Tolgoi will work to develop a strategy addressing the issue of artisanal miners including their health.

### 18.6.7 Local economic changes and food security, nutrition and fuel poverty<sup>18</sup>

The transition to a market economy has brought changes in food consumption patterns. Many cheap, poor quality and unsafe food products are imported or are produced by poorly regulated domestic private companies. Control of food safety in the whole *aimag* is poor. Policemen, tax inspectors and doctors may carry out food inspections occasionally. Improper food storage and inadequate food handling is reported to be common. Due to high population influx the cost of food products has increased in the last

---

<sup>16</sup> Oyu Tolgoi Community Health Safety and Security Impact Assessment 2011

<sup>17</sup> Influx Assessment Report 2007

<sup>18</sup> Oyu Tolgoi Community Health Safety and Security Impact Assessment 2011

two years. As a consequence local unemployed families may have difficulty affording sufficient food and fuel, and this is likely to cause health complications. Responsibility for monitoring and assessing the influence of local economic conditions on the health of local residents rests with many organisations including national and local government, businesses, local NGOs and Oyu Tolgoi through the CSP Unit. Oyu Tolgoi will set up a monitoring system to ensure its compliance with the Government of Mongolia's regulations.

### 18.6.8 Community grievance management

The community *Grievance Procedure* will continue to be used to monitor if any issues related to security personnel arise during construction and operations. The procedure categorises different types of complaints, including a category for any grievances related to security arrangements. *Chapter D14: Stakeholder Engagement Plan* includes a copy of this procedure and different categories of complaints recorded. This procedure is being implemented with local residents. The Oyu Tolgoi Communities team will be involved in any issues related to Project security and local communities. Oyu Tolgoi commits to involve external stakeholders (i.e. police, *soum/aimag* authorities) in any off-site security incidents and ensure appropriate incident response procedures are implemented as required.

### 18.6.9 Community emergency preparedness and response

A project-wide emergency response plan has been implemented (see *D20 Emergency Response Plan*). This plan addresses:

- Roles and responsibilities (Disaster Management and Recovery teams);
- Contact details for Project personnel and relevant third party organisations;
- Lines of communication;
- Area-based emergency procedures for the mine licence site, the airport and other off-site construction areas, each of which include:
  - Response actions; and
  - Recovery actions.
- Evacuation plans.

Specific procedures are in place to address:

- Natural disasters;
- Pandemics (see also the Pandemic L3 Procedure);
- Medical Emergencies;
- Fires and explosions;
- Traffic incidents;
- Civil unrest;
- Bomb warnings; and
- Environmental incidents including release of fuels and hazardous substances (see ERP02).

In order to protect local communities the following provisions will also be implemented:

- Oyu Tolgoi will work with communities and administrators to identify an effective emergency alert system for the Project;
- Oyu Tolgoi will provide potentially affected communities with information regarding the potential hazards and Project responses;
- Oyu Tolgoi will work with communities in a collaborative manner to develop action plans for their preparedness and response;
- Participative workshops and emergency response demonstrations will be carried out in Project-affected communities; and

- The Emergency Response Team (ERT) for the Oyu Tolgoi mine will be identified to local communities near the site so that they are familiar with this group should they need to be deployed off-site at any time.

#### **18.6.10 Summary of mitigation measures**

A number of key potential impacts have been identified that occur throughout the lifecycle of the Project. **Error! Reference source not found.** below summarises the mitigation measures and management controls related to these.

**Table 18.1: Mitigation Measure, Management Controls and Key Performance Indicators**

ID	Topic/Aspect	Applicable to/ Activity	Control Description	Responsible parties	Means of verification	Timescale
CHSS1	Transmission of disease from the workforce to the community	Employees Construction, Operations and Decommissioning phases	<p>Oyu Tolgoi will implement the following:</p> <ul style="list-style-type: none"> <li>▪ Oyu Tolgoi Healthy Workplace Programme.</li> <li>▪ Oyu Tolgoi Camp Policy and Code of Behaviour.</li> <li>▪ Corporate STI, HIV and AIDS response.</li> <li>▪ Worker Health, Safety &amp; Security Management Plan.</li> <li>▪ Oyu Tolgoi Security Response Plan.</li> </ul>	<p>Oyu Tolgoi Health, Safety and Security Department Principal Contractors</p>		Ongoing
CHSS2	Community safety	Traffic safety and prevention of road accidents	<p>Implement the provisions of the Transport Management Plan in relation to road safety, road condition and road use:</p> <ul style="list-style-type: none"> <li>▪ Upgrade and seal Oyu Tolgoi to Gashuun Sukhait road.</li> <li>▪ Design road for appropriate truck size and traffic volume.</li> <li>▪ Maintain road quality and related safety signage on roads heavily used by the Project.</li> <li>▪ Fit satellite tracking and speed monitoring devices wherever possible to enforce driver compliance.</li> <li>▪ Carry out driver safety training including training in procedures for driving when animal observed on or near road.</li> <li>▪ Animal crossings identified and signage erected to alert drivers. Construct road junctions with clear markings of rights of way.</li> <li>▪ Implement procedures for safe transport of hazardous materials, including emergency response requirements.</li> <li>▪ Transport contractors will have emergency response plans; Oyu Tolgoi will conduct regular safety audits of transport contractors.</li> <li>▪ Community Liaison - consider implementing a comprehensive Traffic Awareness Programme in local communities and along transport supply</li> </ul>	<p>Oyu Tolgoi CSP Department Oyu Tolgoi Health, Safety and Security Department Principal Contractors Oyu Tolgoi Environmental Department</p>	Review of records	Ongoing

ID	Topic/Aspect	Applicable to/ Activity	Control Description	Responsible parties	Means of verification	Timescale
			route.			
CHSS2-a	Community safety	Traffic safety and prevention of road accidents	Oyu Tolgoi will help build capacity and investment in emergency/medical service providers.	Oyu Tolgoi construction Department Oyu Tolgoi CSP Department Oyu Tolgoi Health, Safety and Security Department Principal Contractors	Review of records	
CHSS2-b	Community safety	Traffic safety and prevention of road accidents	Oyu Tolgoi will perform route assessments for all transport routes to ensure that Oyu Tolgoi understands the risks associated with each route. Good road design and safety signage will be considered during this process.	Oyu Tolgoi CSP Department Oyu Tolgoi Health, Safety and Security Department Principal Contractors	Review of records	During construction
CHSS2-c	Community safety	Traffic safety and prevention of road accidents	Form partnerships with government and other stakeholders to improve capacity to respond to road accidents.	Oyu Tolgoi CSP Department Oyu Tolgoi Health, Safety and Security Department Principal Contractors Deputy Director Camp Services' office	Review of records	Ongoing
CHSS2-d	Community safety	Traffic safety and prevention of road accidents	Oyu Tolgoi will implement the following Plans: <ul style="list-style-type: none"> <li>▪ Oyu Tolgoi Camp Policy and Code of Behaviour.</li> <li>▪ Emergency Response &amp; Preparedness Plan.</li> <li>▪ Health, Safety and Environmental Management System implemented by Fluor – the EPCM Contractor.</li> <li>▪ Community Health, Safety and Security Management Programme.</li> </ul>	Oyu Tolgoi CSP Department Oyu Tolgoi Health, Safety and Security Department Principal Contractors	Review of records	Ongoing
CHSS3	Construction Safety	Protection of local community members from construction related hazards	Oyu Tolgoi will implement the following Plans: <ul style="list-style-type: none"> <li>▪ Transport Management Plan.</li> <li>▪ Hazardous Materials Management Plan.</li> <li>▪ Emergency Response Plan.</li> </ul>	Oyu Tolgoi Construction department Principal Contractors Oyu Tolgoi Health, Safety and Security Department Oyu Tolgoi CSP Department	Review of records	During construction
CHSS3-a	Construction Safety	Protection of local community members from construction related hazards	All construction related activities must be conducted in designated permitted areas only and construction sites clearly demarcated and secured, with appropriate warning signage.	Oyu Tolgoi construction Department Principal Contractors Oyu Tolgoi Health, Safety and Security Department	Review of records	During construction

ID	Topic/Aspect	Applicable to/ Activity	Control Description	Responsible parties	Means of verification	Timescale
				Oyu Tolgoi CSP Department		
CHSS3-b	Construction Safety	Protection of local community members from construction related hazards	Construction camps will be sited in areas away from the winter shelters of rural herders and will implement appropriate measures to control access to and from construction camps.	Oyu Tolgoi construction Department Principal Contractors Oyu Tolgoi Health, Safety and Security Department Oyu Tolgoi CSP Department	Review of records	During construction
CHSS3-c	Construction Safety	Protection of local community members from construction related hazards	Oyu Tolgoi will ensure all access routes/crossing points through construction areas are identified, safe, clearly signposted and supervised.	Oyu Tolgoi construction Department Principal Contractors Oyu Tolgoi Health, Safety and Security Department Oyu Tolgoi CSP Department	Review of records	During construction
CHSS3-d	Construction Safety	Protection of local community members from construction related hazards	A chain link fence will be constructed around operational sites and security personnel will be used to control ingress/egress.	Oyu Tolgoi construction Department Principal Contractors Oyu Tolgoi Health, Safety and Security Department Oyu Tolgoi CSP Department	Review of records	During construction
CHSS3-e	Construction Safety	Protection of local community members from construction related hazards	Equipment and hazardous materials must be removed from completed work areas and open pits/other hazards secured against public access prior to rehabilitation.	Oyu Tolgoi construction Department Principal Contractors Oyu Tolgoi Health, Safety and Security Department Oyu Tolgoi CSP Department	Review of records	During construction
CHSS3-f	Construction Safety	Protection of local community members from construction related hazards	Dust suppression, topsoil management and noise reduction measures will be employed to minimise impacts on local communities and nearby land users. Reference air emissions and noise management plans.	Oyu Tolgoi construction Department Principal Contractors Oyu Tolgoi Health, Safety and Security Department Oyu Tolgoi CSP Department	Review of records	During construction
CHSS3-g	Construction Safety	Protection of local community members from construction related hazards	Oyu Tolgoi will require workers and contractors to provide sufficient advance notice to Oyu Tolgoi Communities personnel so that neighbours and affected community members can be informed of the commencement of construction works in an area.	Oyu Tolgoi construction Department Principal Contractors Oyu Tolgoi Health, Safety and Security Department Oyu Tolgoi CSP Department	Review of records	During construction
CHSS3-h	Construction Safety	Protection of local community members from construction	Times for blasting will be selected to minimise disturbance to the community and information will be	Oyu Tolgoi construction Department Principal Contractors	Review of records	During construction

ID	Topic/Aspect	Applicable to/ Activity	Control Description	Responsible parties	Means of verification	Timescale
		related hazards	provided to local communities advising on how blasting will proceed.	Oyu Tolgoi Health, Safety and Security Department Oyu Tolgoi CSP Department		
CHSS3-i	Construction Safety	Protection of local community members from construction related hazards	Community relations staff must provide regular updates to herders and other residents about potential Project hazards and significant changing activities. (see stakeholder engagement plan for further information.)	Oyu Tolgoi construction Department Principal Contractors Oyu Tolgoi Health, Safety and Security Department Oyu Tolgoi CSP Department	Review of records	Ongoing
CHSS3-j	Construction Safety	Protection of local community members from construction related hazards	In order to limit the effect of dust generated by increasing traffic in local communities, transport will be restricted to designated routes during the construction, operations and decommissioning phases.	Oyu Tolgoi construction Department Principal Contractors Oyu Tolgoi Health, Safety and Security Department Oyu Tolgoi CSP Department	Review of records	Ongoing
CHSS4	Health & Safety	Site safety and security personnel	Site safety will be enforced by implementation of: <ul style="list-style-type: none"> <li>▪ Oyu Tolgoi Camp Policy and Code of Behaviour.</li> <li>▪ Oyu Tolgoi Security Plan.</li> <li>▪ Transport Management Plan.</li> <li>▪ Emergency Response &amp; Preparedness Plan.</li> <li>▪ Health, Safety and Environmental Management System implemented by Fluor – the EPCM Contractor.</li> </ul>	Oyu Tolgoi CSP Department Oyu Tolgoi Health, Safety and Security Department	Review of records	Ongoing
CHSS4-a	Health & Safety	Site safety and security personnel	To reduce risks associated with security, Oyu Tolgoi will: <ul style="list-style-type: none"> <li>▪ Conduct security activities in accordance with Voluntary Principles on Security and Human Rights, and control access to operational areas through security personnel, fencing and awareness.</li> <li>▪ Provide Human Rights induction training to employees and contractors.</li> <li>▪ Support security providers to offer training in human rights to their personnel.</li> <li>▪ Conduct full assessment of security personnel/providers and enhanced human rights</li> </ul>	Oyu Tolgoi Health, Safety and Security Department	Review of records	Ongoing

ID	Topic/Aspect	Applicable to/ Activity	Control Description	Responsible parties	Means of verification	Timescale
			<p>training for security and police.</p> <ul style="list-style-type: none"> <li>▪ Oyu Tolgoi to regularly audit security personnel.</li> <li>▪ Establish dedicated team to manage security and implement Security Management Plans. Ensure senior Mongolian representing Oyu Tolgoi in all security related matters.</li> <li>▪ Develop and implement procedure on control of the use of force by security personnel.</li> <li>▪ Maintain security fencing of Mine License Area and Airport.</li> <li>▪ Develop an operational readiness plan for Security that includes security issues both at the Oyu Tolgoi site and offices and expatriate security in Ulaanbaatar will be completed prior to the commencement of the operations phase.</li> </ul>			
CHSS4-b	Health & Safety	Site safety and security personnel	Night controls: equipment will be secured appropriately overnight and night security and storage measures will be implemented (e.g. organic waste removed, night watchmen employed, lighting over construction sites).	Oyu Tolgoi CSP Department Oyu Tolgoi Health, Safety and Security Department	Review of records	Ongoing
CHSS4-c	Health & Safety	Site safety and security personnel	Oyu Tolgoi will involve appropriate external government stakeholders	Oyu Tolgoi CSP Department Oyu Tolgoi Health, Safety and Security Department	Review of records	Ongoing
CHSS4-d	Health & Safety	Site safety and security personnel	Oyu Tolgoi will use the community grievance mechanism to monitor if any issues related to security personnel arise during construction and operations.	Oyu Tolgoi CSP Department Oyu Tolgoi Health, Safety and Security Department	Review of records	Ongoing
CHSS5	Health issues associated with influx (pressure on health care, increased incidence of communicable and non-communicable disease)	Omnogovi <i>aimag</i> and <i>soum</i> residents / Construction, Operations and Decommissioning phases	<p>Oyu Tolgoi will undertake and implement the following activities:</p> <ul style="list-style-type: none"> <li>▪ Community Health, Safety and Security Management Programme.</li> <li>▪ Worker Health Screening.</li> <li>▪ Human trafficking risk assessment.</li> <li>▪ Health promotion programme in <i>soum</i> with focus on high risk groups.</li> <li>▪ Influx Management Programme.</li> <li>▪ Facilitation of a multi-stakeholder public private</li> </ul>	International organisations, National and local government, NGOs and local organizations, Oyu Tolgoi CSP	Review of records	Ongoing

ID	Topic/Aspect	Applicable to/ Activity	Control Description	Responsible parties	Means of verification	Timescale
			<p>partnership to improve delivery of health programmes in impact areas.</p> <ul style="list-style-type: none"> <li>Facilitate health systems strengthening programme through MOH.</li> </ul> <p>Please refer to Influx MP for further information.</p>			
CHSS5-a	Safety and Security	Security and personal safety in the community	Oyu Tolgoi will promote culturally-acceptable behaviour by all workers and minimise non-local worker/community interaction, particularly during the construction phase.	Oyu Tolgoi CSP Department Oyu Tolgoi Human Resources Department	Review of records	Ongoing
CHSS5-b	Safety and security	Security and personal safety in the community	Oyu Tolgoi will implement recruitment and other procedures to minimise influx of speculative job seekers.	Oyu Tolgoi CSP Department Oyu Tolgoi Human Resources Department	Review of records	Ongoing
CHSS5-c	Safety and security	Security and personal safety in the community	Family housing will be encouraged in Khanbogd for operations phase workers and single accommodations will be provided on site for FIFO (fly-in and fly-out) Please refer to Influx MP for further information.	Oyu Tolgoi CSP Department Oyu Tolgoi Health, Safety and Security Department Oyu Tolgoi Human Resources Department	Review of records	Ongoing
CHSS5-d	Safety and security	Security and personal safety in the community	Enforce Camp Policy and Code of Behaviour for workers including rules about anti-social and illegal behaviour.	Oyu Tolgoi CSP Department Oyu Tolgoi Human Resources Department Oyu Tolgoi Health, Safety and Security Department	Review of records	Ongoing
CHSS5-e	Safety and security	Security and personal safety in the community	Oyu Tolgoi will develop a Healthy Workplace Programme to promote healthy approaches to alcohol consumption and other personal behaviour that can contribute to poor social conduct outside of the work environment.	Oyu Tolgoi CSP Department Oyu Tolgoi Human Resources Department Oyu Tolgoi Health, Safety and Security Department	Review of records	Ongoing
CHSS5-f	Safety and security	Security and personal safety in the community	Implement a cultural information program for Mongolian and non-Mongolian workers.	Oyu Tolgoi CSP Department Oyu Tolgoi Health, Safety and Security Department Oyu Tolgoi Human Resources Department	Review of records	Ongoing
CHSS5-g	Safety and security	Security and personal safety in the community	Audit behaviour in community of Oyu Tolgoi and contractor employees. Behavioural complaints are noted through the Complaints, disputes and grievance	Oyu Tolgoi CS Department Oyu Tolgoi Human Resources Department	Review of records	Ongoing

ID	Topic/Aspect	Applicable to/ Activity	Control Description	Responsible parties	Means of verification	Timescale
			procedure	Oyu Tolgoi Health, Safety and Security Department		
CHSS5-h	Safety and security	Security and personal safety in the community	Ensure that Complaints, disputes and grievance procedure covers issues related to security and personal safety in the community.	Oyu Tolgoi CSP Department Oyu Tolgoi Health, Safety and Security Department	Review of records	Ongoing
CHSS5-i	Safety and security	Security and personal safety in the community	Oyu Tolgoi will work with local government and non-government partners to monitor issues related to human trafficking.	Oyu Tolgoi CSP Department Oyu Tolgoi Health, Safety and Security Department	Review of records	Ongoing
CHSS5-j	Safety and security	Security and personal safety in the community	Oyu Tolgoi will partner with local health services to support/facilitate a range of health campaigns including responsible alcohol consumption, mental health and suicide prevention programmes, nutrition, physical activity and human trafficking.	Oyu Tolgoi CSP Department Oyu Tolgoi Health, Safety and Security Department	Review of records	Ongoing
CHSS6	Health of employees	Ensuring the health of Oyu Tolgoi employees and contractors.	Provision of medical facilities on-site for workers and their families including health screening and awareness programme for workers. Oyu Tolgoi will seek to implement the IFC/EBRD worker accommodation guidelines at its worker housing facilities within Khanbogd Soum.	Oyu Tolgoi HSES Department	Review of records	Ongoing
CHSS6-a	Health of employees	Ensuring the health of Oyu Tolgoi employees and contractors.	Oyu Tolgoi will work to implement site worker accommodation standards such as standard for Khanbogd worker housing	Oyu Tolgoi HSES Department	Review of records	Ongoing
CHSS6-b	Health of employees	Ensuring the health of Oyu Tolgoi employees and contractors.	Oyu Tolgoi will provide employees, contractors and others as appropriate with copies of the Camp Policy and Code of behaviour and enforce it accordingly	Oyu Tolgoi Human Resources Department Oyu Tolgoi Health, Safety and Security Department	Review of records	Ongoing
CHSS6-c	Health of employees	Ensuring the health of Oyu Tolgoi employees and contractors.	Implement Oyu Tolgoi Code of Conduct in the community for Oyu Tolgoi workers including rules about anti-social and illegal behaviour. Implement healthy workplace programme	Oyu Tolgoi HSES Department	Review of records	Ongoing
CHSS6-d	Health of employees	Ensuring the health of Oyu Tolgoi employees and contractors.	Partner local health services in Khanbogd <i>soum</i> to support/facilitate a range of health campaigns including responsible alcohol consumption, mental health and suicide prevention programmes, nutrition, physical activity and human trafficking.	Oyu Tolgoi CSP Department Oyu Tolgoi Health, Safety and Security Department	Review of records	Ongoing
CHSS6-e	Health of employees	Ensuring the health of Oyu Tolgoi employees and	Implement the following Plans and Policies:	Oyu Tolgoi CSP Department	Review of records	Ongoing

ID	Topic/Aspect	Applicable to/ Activity	Control Description	Responsible parties	Means of verification	Timescale
		contractors.	<ul style="list-style-type: none"> <li>▪ Labour Management Plan.</li> <li>▪ Worker Health, Safety &amp; Security Management Plan.</li> <li>▪ Oyu Tolgoi Healthy Workplace Programme.</li> <li>▪ Oyu Tolgoi Camp Policy and Code of Behaviour.</li> <li>▪ Corporate STI, HIV and AIDS response.</li> <li>▪ Oyu Tolgoi Security Response Plan.</li> </ul>	Oyu Tolgoi HSES Department		
CHSS7	Health of community	Ensuring the health of the community around Oyu Tolgoi	Facilitate a multi-stakeholder public private partnership to improve delivery of health programmes in impact areas. For example the Oyu Tolgoi Community Health, Safety and Security Management Programme.	Oyu Tolgoi CSP Department	Review of records	Ongoing
CHSS7-a	Health of community	Ensuring the health of the community around Oyu Tolgoi	Develop health promotion programmes in Khanbogd <i>soum</i> .	Oyu Tolgoi CSP Department	Review of records	Ongoing
CHSS7-b	Health of community	Ensuring the health of the community around Oyu Tolgoi	Facilitate health systems strengthening programme through working with Ministry of Health as part of the Oyu Tolgoi Community Health, Safety and Security Management Programme	Oyu Tolgoi CSP Department	Review of records	Ongoing
CHSS7-c	Health of community	Ensuring the health of the community around Oyu Tolgoi	Continue to implement a doctor support programme (DSP) The DSP ensures the availability of highly specialised doctors in remote <i>soums</i> . It enables us to improve conditions and opportunities to access health services for local community.	Oyu Tolgoi CSP Department	Review of records	Ongoing
CHSS7-d	Health of community	Ensuring the health of the community around Oyu Tolgoi	Based on the HIA findings, a long-term CHSSP programme will be developed to minimise and mitigate health impacts caused by Oyu Tolgoi operations and to improve health service delivery and capacity in the Project Area of Influence based on the changing health service needs of the area. The Programme will have a strong emphasis on sustainability, and will closely involve relevant public-sector agencies and institutions, such as the Ministry of Health, <i>aimag</i> Health Department, <i>soum</i> hospitals, and the State Inspection Authority. (It covers all commitments related to community health section)	Oyu Tolgoi CSP Department	Review of records	Ongoing
CHSS7-e	Health of community	Ensuring the health of the community around Oyu Tolgoi	Implement the Oyu Tolgoi Healthy <i>Soums</i> Programme	<ul style="list-style-type: none"> <li>▪ Oyu Tolgoi CSP Department</li> </ul>	Review of records	Ongoing

ID	Topic/Aspect	Applicable to/ Activity	Control Description	Responsible parties	Means of verification	Timescale
CHSS7-f	Health of community	Ensuring the health of the community around Oyu Tolgoi	Set up a health monitoring system to monitor the health of herders through the Oyu Tolgoi Herder Outreach Programme.	Oyu Tolgoi CSP Department	Review of records	Ongoing
CHSS7-g	Health of community	Ensuring the health of the community around Oyu Tolgoi	Set up a monitoring system to assess the influence of local economic conditions on the health of local residents.	Oyu Tolgoi CSP Department Oyu Tolgoi Health, Safety and Security Department	Review of records	Ongoing
CHSS7-h	Health of community	Ensuring the health of the community around Oyu Tolgoi	<p>Develop a clear Communicable Disease Management Plan to cover Oyu Tolgoi and contractor personnel, host communities, freight vehicle drivers/transportation workers. This will include the following:</p> <ul style="list-style-type: none"> <li>▪ Most workers will live in camps during construction and interaction with the community controlled. No non-employees in camps.</li> <li>▪ Implement worker Code of Conduct to include community interactions, rules on drug use, prostitution, etc.</li> <li>▪ Comprehensive worker health screening programme and regular health checks.</li> <li>▪ Comprehensive STI/HIV awareness programme for workers and local communities.</li> <li>▪ Contribute to national control programmes for communicable diseases in Project Area of Influence.</li> <li>▪ Investments in medical services, health facilities, equipment, and training of medical staff.</li> </ul>	Oyu Tolgoi CSP Department	Review of records	Ongoing
CHSS7-i	Health of community	Ensuring the health of the community around Oyu Tolgoi	Undertake a human trafficking risk assessment if it arises as a significant local issue	Oyu Tolgoi CSP Department	Review of records	Ongoing
CHSS7-j	Health of community	Ensuring the health of the community around Oyu Tolgoi	Oyu Tolgoi will provide support and assistance (financial, technical and other as appropriate) to local and regional development including the planning and development of health services and social service delivery.	Oyu Tolgoi CSP Department	Review of records	Ongoing
CHSS8	Health of Community	Emergency Response	Oyu Tolgoi will prepare an Emergency Response Plan (see <i>Chapter D20: Emergency Response Plan</i> )	Oyu Tolgoi Health, Safety and Security Department	D20 Emergency Response Plan	

ID	Topic/Aspect	Applicable to/ Activity	Control Description	Responsible parties	Means of verification	Timescale
CHSS8-a	Health of Community	Emergency Response	Oyu Tolgoi will provide capacity-building to relevant service providers to support emergency response	Oyu Tolgoi Health, Safety and Security Department	Review of records	Ongoing
CHSS8-b	Health of Community	Emergency Response	Community Emergency Response Plans will be developed and tested by Oyu Tolgoi with local residents and local authorities in the vicinity of Project-related traffic. These will include emergency response related to traffic accidents involving Project vehicles and potential releases of chemicals and other hazardous materials.	Oyu Tolgoi Health, Safety and Security Department	Review of records	Ongoing
CHSS9	Dust and Nuisance Impacts	Mitigation measures for dust and noise	Implement dust control measures as outlined in <i>Chapter D2: Atmospheric Emissions Management Plan</i>	Oyu Tolgoi Environmental Department Oyu Tolgoi Health, Safety and Security Department	Review of records	Ongoing
CHSS9-a	Dust and Nuisance Impacts	Mitigation measures for dust and noise	Oyu Tolgoi will upgrade and seal the road from Oyu Tolgoi to Gashuun Sukhait, and will contribute to the maintenance of other roads that are heavily used by the Project such as the road from Oyu Tolgoi to Khanbogd.	Oyu Tolgoi Environmental Department Oyu Tolgoi Health, Safety and Security Department	Review of records	Ongoing
CHSS9-b	Dust and Nuisance Impacts	Mitigation measures for dust and noise	To prevent increased dust affecting community health, Oyu Tolgoi will: <ul style="list-style-type: none"> <li>Implement regular spraying in certain sections of roads near to herder winter shelters and herder wells.</li> <li>Control vehicle loads during construction.</li> <li>Restrict transport to designated routes.</li> </ul>	Oyu Tolgoi Environmental Department Oyu Tolgoi Health, Safety and Security Department	Review of records	Ongoing
CHSS9-c	Dust and Nuisance Impacts	Mitigation measures for dust and noise	To reduce noise nuisance Oyu Tolgoi will: <ul style="list-style-type: none"> <li>Implement a Noise Management Plan.</li> <li>Implement noise suppression measures including the use of noise berms, routine and ongoing equipment maintenance, equipment location and orientation and control of working hours.</li> <li>Communities team to provide information to local people about blasting operations and times of occurrence.</li> </ul>	Oyu Tolgoi Environmental Department Oyu Tolgoi Health, Safety and Security Department	Review of records	Ongoing
CHSS10	Changes in access to water	Mitigation measures for prevention of negative impacts	Oyu Tolgoi will implement the following: <ul style="list-style-type: none"> <li>Water Resources Management Plan.</li> </ul>	Oyu Tolgoi CSP Department Oyu Tolgoi Environmental	Review of records	Ongoing

ID	Topic/Aspect	Applicable to/ Activity	Control Description	Responsible parties	Means of verification	Timescale
	and water quality	to water supply and water quality.	<ul style="list-style-type: none"> <li>Influx Management Plan.</li> </ul>	Department		
CHSS10-a	Changes in access to water and water quality	Mitigation measures for prevention of negative impacts to water supply and water quality.	Commitments are to: Develop participatory monitoring programme Completion of studies for Khanbogd water supply resources (reticulation to be provided by ADB)	Oyu Tolgoi CSP Department	Review of records	Ongoing
CHSS10-b	Changes in access to water and water quality	Mitigation measures for prevention of negative impacts to water supply and water quality.	Oyu Tolgoi will implement measures to ensure that construction activities do not adversely impact herders well and natural spring water quality, and if impacted, that appropriate mitigations are undertaken, as described in the Water Resource Management Plan..	Oyu Tolgoi Environmental Department	Review of records	Ongoing
CHSS10-c	Changes in access to water and water quality	Mitigation measures for prevention of negative impacts to water supply and water quality.	Undertake a borehole drilling and aquifer testing programme to facilitate water quality and quantity monitoring (see <i>Chapter D5: Water Resources Management Plan</i> )	Oyu Tolgoi Environmental Department	Review of records	Ongoing
CHSS10-d	Changes in access to water and water quality	Mitigation measures for prevention of negative impacts to water supply and water quality.	Use appropriate storage of hazardous materials and regularly disposal of wastes to Oyu Tolgoi's waste management facility.	Oyu Tolgoi Environmental Department	Review of records	Ongoing
CHSS10-e	Changes in access to water and water quality	Mitigation measures for prevention of negative impacts to water supply and water quality.	Produce detailed engineering solutions to the Undai diversion to ensure that they are robust and sustainable, and ensure that surface water resources are not degraded, but passed effectively around Oyu Tolgoi's operations.	Oyu Tolgoi Environmental Department	Review of records	Ongoing
CHSS10-f	Changes in access to water and water quality	Mitigation measures for prevention of negative impacts to water supply and water quality.	Ensure that groundwater abstraction is from aquifers deeper than those used by the herders.	Oyu Tolgoi Environmental Department	Review of records	Ongoing
CHSS10-g	Changes in access to water and water quality	Mitigation measures for prevention of negative impacts to water supply and water quality.	Conserve water wherever possible as part of Oyu Tolgoi's on-going work to increase efficiency of water use	Oyu Tolgoi Environmental Department	Review of records	Ongoing

## 18.7 ROLES & RESPONSIBILITIES

Overall responsibility for the implementation of this Management Plan shall rest with the Oyu Tolgoi Communities & Social Performance Manager who shall report on progress to the Oyu Tolgoi General Manager.

Others with responsibility for the implementation of this Management Plan shall include:

- The EPCM Programme Manager shall be responsible for the integration of these procedures and requirements into their operating procedures and plans;
- Oyu Tolgoi Mine Manager shall be responsible for ensuring that these procedures and requirements are implemented for all mine operations;
- The Oyu Tolgoi HSES Deputy Director will coordinate all aspects of mine transport to ensure efficient and effective transportation services for the mine. The HSES Deputy Director will also be responsible for ensuring driver orientation, overseeing regularly scheduled maintenance and mechanical inspection of trucks;
- The Oyu Tolgoi site Deputy Director Camp Services' office has responsibility for the maintenance of records of both Oyu Tolgoi vehicle and non-Oyu Tolgoi vehicle accidents. These are then referred to the HSES Department which then investigates each incident; and
- The Oyu Tolgoi Environment Department Manager shall be responsible for ensuring that any environmental aspects of the plan are adequately implemented.

At present, there exist many organisations that work to improve the health of local communities in the Project Area of Influence. These include international organisations such as the World Health Organisation (WHO), the Mongolian Ministry of Health, the Omnogovi *aimag* and *soum* health departments, NGOs and community organisations. Oyu Tolgoi will closely collaborate with these partners to protect and improve the health of local people.

## 18.8 TRAINING

All employees of Oyu Tolgoi and Contractors to Oyu Tolgoi are provided with basic training on health, safety and security, including health awareness training and induction in the *Camp Policy and Code of Behaviour*. Additional specialist training is to be provided to the security personnel (including on the human rights and the use of force), drivers (as outlined in *Chapter D11: Transport Management Plan*), and key personnel involved in activities that are conducted off-site, e.g. along the transport route.

## 18.9 MONITORING AND KEY PERFORMANCE INDICATORS

It is important to monitor activities at the mine site, as well as those that occur off-site to ensure that local and regional communities are protected. A comprehensive Social Risk Analysis was completed in September 2011. The Risk Analysis examined all social risks identified by Oyu Tolgoi (CSP). Risks were evaluated based on likelihood of occurrence and control mechanisms in place. The Risk Analysis will be updated periodically as the Project moves from construction through to operations. Ongoing monitoring procedures in relation to community health and safety are as follows:

- The Oyu Tolgoi Health Safety and Environment General working in collaboration with the CSP Senior Manager shall report on a regular basis to the Oyu Tolgoi Chief Operating Officer on the implementation of this Management Plan including:
  - Time lost to illness or disease by workers;
  - Any instances of workforce non-compliance with CHSS Project rules and regulations;
  - Workforce conduct within the community including any incidents of conflict and crime;
  - Any visitor incidents of health, safety or security;
  - Any breaches of Site security arrangements;
  - Any problems linked to healthy working and living conditions;
  - Any reported herder health issues;

- Condition of access roads and dust suppression activities; and
- Any arising water issues.
- The Oyu Tolgoi HSES Deputy Director shall inspect the condition of areas of activity at the site on a monthly basis and shall maintain appropriate records. The inspection shall include:
  - Safety practices in areas that could impact communities;
  - Spot checks of vehicles entering/exiting nearby local communities;
  - Spot checks to indicate that workers and communities are aware of health issues, the Code of Conduct and other Project rules;
  - Conditions of roads and other areas prone to dust;
  - Health, safety and security inductions;
  - Record for the personal health program;
  - Records for the drug and alcohol testing program;
  - Lost time incident statistics; and
  - Records related to education events to raise health, safety and security awareness in communities.

The table below summarises the key performance indicators and associated key monitoring actions that can be used to assess the progress and effectiveness of proposed mitigation strategies.

**Table 18.2: Key Performance Indicators and monitoring actions – Community health, safety and security**

ID	KPI	Target	Key Monitoring Actions
CHSS01	Healthy workforce	To ensure that all employees have access to and receive good quality health care when required and that health promotion work is used to provide information on potential illnesses	<ul style="list-style-type: none"> <li>▪ Record all incidents of communicable and non-communicable illnesses among the workforce.</li> <li>▪ Number of health awareness training sessions provided to staff.</li> <li>▪ Record presence and numbers/qualifications of key health personnel and facilities such as ambulance on site and medical units, including at the camps.</li> <li>▪ Record all visits of employees to site health facilities.</li> </ul>
CHSS02	Safe operation of traffic and transport activities	To prevent road traffic accidents	<ul style="list-style-type: none"> <li>▪ Number, type and frequency of Oyu Tolgoi traffic incidents and accidents.</li> <li>▪ Number of complaints received related to Oyu Tolgoi road safety.</li> </ul>
CHSS03	Safe operation of work sites	To prevent all site accidents including those related to traffic, operation of machinery and hazardous waste disposal	<ul style="list-style-type: none"> <li>▪ Record all site accidents, including those involving visitors and third parties, and caused by third parties.</li> <li>▪ Incident Injury Boards to be located at Front gate, and at entrance to all mess areas with statistics representing Rio Tinto injury classification.</li> <li>▪ Placement of a sign at front gate with message reinforcing importance of seat belts.</li> <li>▪ Rio Tinto Knowledge Share notices applicable to Oyu Tolgoi distributed to site leaders each week with safety brief.</li> </ul>
CHSS04	High level of site security	To ensure that all people on site are only in areas they are permitted to be	<ul style="list-style-type: none"> <li>▪ Number of unauthorised breaches of fence security.</li> <li>▪ Number of unauthorised people found on site and at the camps.</li> <li>▪ Number of staff found in unauthorised areas.</li> </ul>
CHSS05	Protecting community personal health	To provide health promotions activities to improve the health of local communities	<ul style="list-style-type: none"> <li>▪ Number of health promotion activities undertaken.</li> <li>▪ Number of recorded incidences of communicable</li> </ul>

ID	KPI	Target	Key Monitoring Actions
		To constrain levels of communicable disease likely with population influx	<ul style="list-style-type: none"> <li>▪ disease in the Project Area.</li> <li>▪ Number of recorded STIs amongst Oyu Tolgoi workers.</li> <li>▪ Number of morbidity cases per doctor.</li> <li>▪ Hospital bed occupancy levels.</li> <li>▪ Number of health promotion activities provided to local community.</li> <li>▪ Number of training events to support health staff.</li> </ul>
CHSS06	Control dust levels	To prevent high dust levels	<ul style="list-style-type: none"> <li>▪ Number of complaints received related to dust levels.</li> <li>▪ Number of morbidity and mortality cases linked to respiratory disease (as an informative measure as not all will be related to dust).</li> </ul>
CHSS07	Control impact of construction and blasting	To reduce the nuisance to local people from noise and vibration	<ul style="list-style-type: none"> <li>▪ Number of complaints received related to construction and blasting activities.</li> </ul>
CHSS08	Protect herder health	To aim for improvement and prevent deterioration of herder health	<ul style="list-style-type: none"> <li>▪ Number of herders present at health promotion events.</li> <li>▪ Number of herders receiving health check-ups.</li> </ul>
CHSS09	Increase in health impacts from artisanal miners	To constrain possible increase in numbers of artisanal miners linked to mine activities	<ul style="list-style-type: none"> <li>▪ Number of reported artisanal miners in the Project Area.</li> </ul>
CHSS10	Protect community from increased levels of crime	To constrain levels of crime likely with population influx	<ul style="list-style-type: none"> <li>▪ Number of recorded security incidents involving Oyu Tolgoi workers and members of the local population.</li> </ul>
CHSS11	Food security	No decrease in nutrition levels as a result of the Project	<ul style="list-style-type: none"> <li>▪ Morbidity levels related to diet and nutrition.</li> </ul>
CHSS12	Emergency response	Community Emergency preparedness and response plan in place	<ul style="list-style-type: none"> <li>▪ Development of community emergency response procedures.</li> </ul>

## 18.10 UPDATING THIS PLAN

The Oyu Tolgoi Project is currently developing a Community Health, Safety & Security Programme (CHSSP) that will include public awareness campaigns, social infrastructure monitoring and capacity-building for applicable service providers. This Plan will be updated based on the findings of that programme.