

Newcom - (IFC Project # 30322)
ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP)

#	Action	Deliverable	Deadline
PS1: Social and Environmental Assessment and Management Systems			
1	<p>Newcom will prepare and implement a management system encompassing social, occupational health and safety, human resources and environmental affairs for all its operations. The Environmental and Social Management System (ESMS) shall comply with IFC performance standards, taking note of the need for each individual business to comply with the Mongolian national regulations. It will also specify operating policy requirements as well as basic procedures that must be in place for the group and each subsidiary. Newcom will implement a formal system for monitoring and reporting social and environmental issues to senior management and for reporting back to IFC.</p> <p>At a minimum the ESMS will incorporate policies and procedures on the following:</p> <ul style="list-style-type: none"> • Refined Corporate Human Resource Policy which harmonizes practices across subsidiary companies; • Occupational Health and Safety risk management, accident reporting and OHS training, including compliance of contractors; • Life and Fire safety (to international standard) including training; • Emergency preparedness and response plan and training plan; • Management of hazardous materials and liquid and solid waste; • Green procurement and resource conservation; • Land acquisition and involuntary resettlement protocol; • Formal system for community engagement and grievance mechanism, clearly communicated at each site and on Newcom’s website. • Corporate Social Responsibility Strategy 	<p>(i) Signed contract of consultant to advise on preparation of ESMS</p> <p>(ii) Draft ESMS with operating policy requirements and basic procedures.</p> <p>(iii) Final approved ESMS.</p>	<p>(i) Condition of Commitment</p> <p>(ii) Condition of First Disbursement (COD1st)</p> <p>(iii) Condition of Second Disbursement (COD2nd)</p>
2	Identify E&S managerial, reporting and monitoring responsibilities at group and subsidiary level and undertake necessary training.	<p>(i) Outline of E&S organizational structure with roles and responsibilities</p> <p>(ii) Training plan</p>	<p>(i) COD 1st</p> <p>(ii) COD 1st</p>
PS3: Pollution Prevention and Abatement			
3	Develop procedures to minimize air emissions and optimize fuel consumption	Procedures in place	First disbursement+30 days
4	Develop a hospital infection control policy and procedure manual, and a Biomedical waste management system.	Policy, manual and procedures in place	60 days before start of hospital operation
5	Ensure that the joint-venture hospital air emission levels (NOX, SO2, and Particulate	Confirmation of compliance in	Annual

	Matter) comply with IFC EHS General Guideline limits for small combustion units.	Annual Monitoring Report submitted to IFC	
PS4: Community Health, Safety and Security			
6	Obtain IATA Operational Safety Audit (IOSA) accreditation for Eznis.	Certificate in place.	Dec 31, 2011 and according to accreditation agency timeline.
7	<p>Life and Fire Safety (L&FS): For the hospital and all future Newcom facilities and buildings which are publicly accessible, contract a qualified fire safety engineer to:</p> <p>(i) Develop a L&FS master plan (i.e. fire safety specifications) causing the facility design and construction to comply with an international fire code. (ii) Conduct L&FS audit against an international fire code. (iii) On the basis of audit recommendations, agree with IFC on a mutually acceptable time frame for implementing these.</p>	<p>Following acceptable to IFC:</p> <p>(i) Master plan in place (ii) Audit report, with implementation plan and resource allocation (iii) Implementation progress reports</p>	<p>(i) 1 month before start of construction (ii) Within 3 months of facility construction completion (iii) Semi-annual</p>
PS6: Biodiversity Conservation and Sustainable Natural Resource Management			
8	<p>Develop an environmental and social management plan (ESMP), satisfactory to IFC, for construction and operation of the wind farm, which will include key mitigation measures such as, but not be limited to:</p> <ul style="list-style-type: none"> Encouraging key species to nest away from the turbines by providing alternative nesting sites to enable establishment of nests prior to construction. Avoiding the possibility of enhancing raptor food sources (small mammals) in the proximity to the turbines; and minimizing food resources by surveying for and removing all livestock and wildlife carcasses (vulture and other scavenging bird food source). Placing “bird diverters” on all overhead transmission lines to discourage perching and designing towers and lines so as to reduce the likelihood of electrocution. 	<p>Following acceptable to IFC:</p> <p>(i) Construction environmental management plan (ii) Operational environmental management plan (iii) Bird survey reports and bird strike reports by a qualified expert acceptable to IFC</p>	<p>(i) Prior to Commitment/Signing contract with EPC consultant (ii) COD1st (iii) Annually</p>
9	Commission a bird specialist approved by IFC to supervise implementation of the mitigation measures, undertake bird monitoring prior to and during construction and for the first two years of operation and use the results to refine the mitigation plan	(i) Signed contract with approved ornithologist	(i) COD1st