

Eskom Holdings Limited

**Eskom Just Energy Transition Project
(P177398)**

Draft

**ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)**

28 September 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Eskom Holdings Limited (the “Borrower” or “Eskom”) will implement the Eskom Just Energy Transition Project (the “Project”), as set out in the Loan Agreement, the CCEFCF Financing Agreement, and the ESMAP Grant Agreement; and with the support of the Republic of South Africa (the “Guarantor”) in accordance with the Guarantee Agreement and the CCEFCF Guarantee Agreement (the “Guarantee Agreements” and, together with the Loan Agreement, the CCEFCF Financing Agreement and the ESMAP Grant Agreement, the “Legal Agreements”). The International Bank for Reconstruction and Development/International Development Association (the “World Bank,” or the “Bank”), acting in its own capacity, as the administrator of the Canada Clean Energy and Forest Climate Facility Single-Donor Trust Fund (“CCEFCF”), and as the administrator of the Energy Sector Management Assistance Program (“ESMAP”), has agreed to provide financing (P177398) for the Project, as set out in the referred agreement(s).
2. The Borrower and the Guarantor shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the World Bank, and the Guarantor shall provide support to the Borrower as needed and as set forth in the Guarantee Agreements. The ESCP is a part of the Legal Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred Legal Agreements.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the World Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the World Bank.
4. As agreed by the World Bank and the Borrower, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Borrower and the World Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the World Bank and the Borrower. The Borrower shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the World Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of Environmental and Social (E&S) instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s) in a form and substance satisfactory to the Bank.</p>	Submit quarterly reports to the World Bank throughout Project implementation commencing from Effective Date, within 2 (two) weeks after the close of the quarterly reporting period.	Eskom
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the World Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the World Bank’s request, prepare a report on the incident or accident and propose any measures to address it as well as prevent its recurrence.</p>	<p>Notify the World Bank no later than 48 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the World Bank within a timeframe acceptable to the World Bank.</p>	Eskom
C	<p>OWNERS ENGINEERS REPORTS</p> <p>Eskom shall provide to the Bank the monthly supervising firm monitoring reports on Environmental, Social, Health and Safety (ESHS) performance in a format and substance satisfactory to the World Bank.</p>	Submit the reports to the World Bank as part of the quarterly report in Section A of this ESCP.	Eskom/ Owners Engineer
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Maintain qualified staff and resources within the Clean Energy Unit (CEU) for Parts A and B of the Project and the Just Energy Transition Office (JETO) for Part C of the Project, to support the management of the ESHS risks and impacts of the Project. The staffing within the CEU and JETO shall at a minimum include one health and safety specialist, one environmental specialist, one social specialist and one stakeholder engagement specialist for each unit.</p>	Maintain ESHS management unit within CEU and JETO throughout Project implementation.	Eskom

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>1.2 ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <ol style="list-style-type: none"> 1. Prepare and disclose Draft Environmental and Social Impact Assessments (ESIAs), consistent with the Terms of References (ToRs) approved by the Bank, including recommendations for further studies and a ToR for the preparation of full ESIs for Parts A and B of the Project, consistent with the relevant ESSs and to the satisfaction of the Bank. 2. Prepare, consult, disclose and implement an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) for Part A of the Project (the decommissioning and shutdown of the Komati Power Station), consistent with the agreed ToR and the relevant ESSs and to the satisfaction of the Bank. 3. Prepare, consult, disclose and implement an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) for the Solar Photovoltaic (PV), Battery Energy Storage System (BESS) and Condensers under Part B of the Project (the repowering and repurposing of the Komati Power Station) consistent with the agreed ToR and the relevant Environmental and Social Standards (ESSs) and to the satisfaction of the Bank. 4. Prepare, consult, disclose and implement an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) for the wind repurposing under Part B of the Project, consistent with agreed ToR, and the relevant ESSs and to the satisfaction of the Bank. 5. Prepare, consult, disclose, and implement Environmental and Social Management Plans for the proposed piloting/scaling up of innovative activities/initiatives, namely the microgrid assembly and fabrication factory plant, the Komati Training Facility, and other such activities/initiatives located within the Komati Complex Footprint under Part C of the Project. 6. Submit for Bank’s non-objection a site-specific Construction Environmental and Social Management Plan for the 500 kWp Agrivoltaic Plant under Part C of the Project, prepared by the Contractor, consistent with the requirements of the ESSs; prior to commencing of the works. 	<ol style="list-style-type: none"> 1. Draft ESIs and ToR for full ESIs were disclosed on August 29, 2022. 2. Prepare, consult, adopt and disclose ESIA and ESMP prior to disbursement under Category 2 as defined in the Loan agreement and the CCEFC Financing Agreement. Thereafter, implement ESIA and ESMP throughout the Project implementation. 3. and 4. Prepare, consult, adopt and disclose ESIs and ESMPs prior to disbursement under Category 3 as defined in the Loan Agreement and the CCEFC Financing Agreement. Thereafter, implement ESIs and ESMPs throughout Project implementation. 5. Prepare, consult adopt and disclose, and implement the specific ESMPs prior to the carrying out of activities associated with piloting/scaling up of innovative activities/initiatives, and thereafter maintain ESMPs throughout Project implementation. 6. Prior to commencement of works associated with the 500 kWp Agrivoltaic plant. 	<ol style="list-style-type: none"> 1. Eskom 2. Eskom 3 and 4. Eskom 5. Eskom 6. Eskom

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>7. Prepare, consult, disclose, and implement an Operational Environmental and Social Management Plan for the 500 kWp Agrivoltaic Plant under Part C of the Project, consistent with the requirements of the ESSs, prior to commissioning of the Agrivoltaic plant.</p>	<p>7. 60 days prior to the date of commissioning the Agrivoltaic plant.</p>	<p>7. Eskom</p>
<p>8. Prepare and submit for Bank’s non-objection the Terms of Reference (TA) for the Technical Assistance under Part B of the Project, for future repurposing.</p>	<p>8. Within 12 months from the Effective Date.</p>	<p>8. Eskom</p>
<p>9. Prepare, consult and disclose and implement an Environmental and Social Management Framework (ESMF) for the activities under Part C of the Project not referred to in Section 1.2(5), 1.2(6) and 1.2(7) of this ESCP, consistent with the ToR agreed to with the Bank and the relevant ESSs, including, but not limited to, assessments of risk and impact associated with labor, GBV/SEA/SH, exclusion/discrimination, occupational and community health and safety, waste management and pollution prevention and use of pesticide and herbicides.</p>	<p>9. The draft ESMF was disclosed on August 29, 2022. Finalize, redisclose and adopt the ESMF prior to disbursement under Part C of the Project and thereafter implement and maintain ESMF throughout Project implementation for activities under Part C of the Project with the exception of activities referred to in Section 1.2(5), 1.2(6) and 1.2(7) of this ESCP.</p>	<p>9. Eskom</p>
<p>10. Screen each of the activities supported under Part C not referred to in Section 1.2(5), 1.2(6) and 1.2(7), for environmental and social risks and impacts, in accordance with the Environmental and Social Management Framework (ESMF) and ensure that the sub-project specific Environmental and Social Assessment (ESA) instruments are prepared, consulted, disclosed, and implemented consistent with the relevant ESSs and to the satisfaction of the Bank.</p>	<p>10. Prepare, consult, adopt, and disclose ESA instruments prior to undertaking each activity supported under Part C. Thereafter, implement these ESA instruments throughout Project implementation.</p>	<p>10. Eskom</p>
<p>11. Obtain, maintain and report to the Bank on the status of all relevant environmental and health and safety licenses, permits and approvals applicable for the Project.</p>	<p>11. Throughout the Project implementation.</p>	<p>11. Eskom with support from Guarantor</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>1.3 MANAGEMENT OF CONTRACTORS</p> <ol style="list-style-type: none"> 1. Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. As part of the bidding and contractor selection process, in consultation with and to the satisfaction of the Bank, ensure that contractors have the necessary E&S qualifications and have adopted plans to implement Project activities in accordance with the ESSs and this ESCP. Thereafter, ensure that the contractors and supervising firms comply and cause subcontractors and supervising firms to comply with the ESHS specifications of their respective contracts. 2. Require the Engineering, Procurement and Construction (EPC) Contractors to develop and implement an Environmental, Social and Health and Safety Management system for their respective areas of responsibility, in accordance with the requirements of the Environmental and Social Standards and consistent with Good International Industry Practices, including ISO14001 and ISO45001, to the satisfaction of the Bank. 3. Ensure that all contractors and sub-contractors conform with the EPC Contractors' ESHS management systems. 4. Require contractors to provide monitoring reports to Eskom, on a monthly basis, on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts. 	<ol style="list-style-type: none"> 1. As part of the preparation of procurement documents and respective contracts under the project, and thereafter supervise contractors and supervising firms throughout Project implementation. 2. Within 60 days prior to the first day of commencement with pre-construction and construction 3. Throughout Project Implementation 4. Submit the ESHS performance reports to the World Bank as annexes to the reports to be submitted under Section A of this ESCP above. 	<p>Eskom</p>
<p>1.4 GENDER AND SOCIAL INCLUSION</p> <ol style="list-style-type: none"> 1. Develop, adopt and implement procedures for determining the eligibility of specific activities under the different sub-components under Part C of the Project, including but not limited to, the Komati Training Facility, local area development activities, community support groups, entrepreneurship development program, Eskom JET stakeholder engagement platform, EJETP community forum. These procedures shall include selection criteria, parameters for selecting beneficiaries, procedures for engagement and decision-making, and other activities under Part C of the Project, to ensure gender equality, social inclusion and transparency in decision-making that is acceptable to the World Bank and consistent with the ESSs. The procedures shall be disclosed publicly through the brochures and other communications materials 	<ol style="list-style-type: none"> 1. Develop and adopt procedures prior to implementation of activities under Part C of the Project and make the criteria publicly available and accessible to all relevant parties. Thereafter, implement procedures throughout Project implementation. 	<p>Eskom and (for Part C of the Project) Service Provider</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>prepared for each activity, and also included in the application forms for each activity.</p> <p>2. (a) Develop, adopt and maintain procedures and provisions for periodic monitoring to ensure inclusion of women, youth and other vulnerable groups in Project benefits in the monitoring and reporting system for the Project; and (b) submit to the World Bank periodic reporting on these inclusion measures and results.</p> <p>3. Develop and maintain mechanisms for regular consultations and feedback from community members, including, women, youth and other vulnerable groups, as per Section 10.1 of this ESCP</p>	<p>2. (a) Include inclusion-related indicators as part of the overall monitoring and reporting system for the Project and thereafter implement throughout Project implementation; (b) Submit quarterly reports to the World Bank throughout Project implementation commencing from Effective Date, within 2 (two) weeks after the close of the quarterly reporting period.</p> <p>3.As per the timing for the SEP under Section 10.1 of this ESCP.</p>	
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>1. Prepare, consult and disclose and implement labor management procedures (LMP) for the Project in accordance with the requirements of ESS2, national laws, Eskom Human Resources Policies and procedures and, inter alia, provisions on working conditions, management of worker relationships, occupational health and safety, code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms, applicable to all Project workers engaged under the Project.</p> <p>2. Include specific provisions in the LMP regarding written notice of termination of employment and eligibility for and terms of severance payments, and thereafter ensure that the payments are made to workers in a timely manner.</p>	<p>1. and 2. Draft LMP was disclosed on 27 September 2022. The LMPs shall be finalized to the satisfaction of the Bank and adopted prior to implementing the activities under Parts A, B and C of the Project. Thereafter, they shall be maintained and updated as necessary throughout Project implementation.</p>	<p>1 Eskom, EPC Contractor and (for Part C of the Project) the Service Provider</p> <p>2. Eskom</p>
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers consistent with ESS2.</p>	<p>Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.</p>	<p>Eskom</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS)</p> <ol style="list-style-type: none"> Update, adopt, maintain and implement the OHS Policies and procedures as part of the Project OHS Management System consistent with the ESS 2, for the implementation of Parts A and B of the Project, including onsite traffic management and supervision of contractors for all phases of the Project life cycle to the satisfaction of the Bank. Ensure that, as part of the EPC Contractors’ ESHS management system referred to in Section 1.3 (2) of this ESCP, the EPC Contractors prepare, adopt and implement an occupational health and safety measures, including onsite traffic management; consistent with the requirements set out in ESS 2 for Parts A and B of the Project to the satisfaction of the Bank. Incorporate and implement occupational health and safety measures consistent with ESS2 as part of the specific ESMPs for Part C of the Project referred to in Section 1.2 (5), 1.2(6) and 1.2(7) of this ESCP to the satisfaction of the Bank. Ensure occupational health and safety measures consistent with ESS2, are incorporated and implemented in the ESMF and the subsequent sub-project Environmental and Social Assessments (ESA) instruments for Part C of the Project referred to in Section 1.2 (10) of this ESCP to the satisfaction of the Bank. 	<ol style="list-style-type: none"> Throughout Project implementation Adopt the OHS management measures, prior to implementing the activities under Project Parts A and B of the Project, and thereafter implement throughout the Project life cycle. As per the timeframe stipulated for Section 1.2 (5), 1.2(6) and 1.2(7) of this ESCP. As per the timeframe stipulated for Section 1.2 (10) of this ESCP. 	<ol style="list-style-type: none"> Eskom Eskom and EPC Contractors Eskom Eskom and (for Part C of the Project) Service Provider
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <ol style="list-style-type: none"> Prepare a hazardous waste inventory for the structures and areas to be decommissioned under Part A of the Project and undertake a due diligence study of the Hazardous waste disposal site to assess adequacy and feasibility of disposing of the hazardous waste to be generated under Part A of the Project as part of the Part A ESIA referred to in Section 1.2 (2) of this ESCP. Prepare, adopt and implement a Waste Management Plan (WMP), to manage hazardous and non-hazardous wastes generated under the implementation of Parts A and B of the Project, consistent with ESS3 and national law and regulations, including extended producer responsibility. The WMP shall include provisions for the management of end-of-life battery, solar and turbine blades. 	<ol style="list-style-type: none"> As per the timeframe stipulated for Section 1.2 (2) of this ESCP. As per the timeframe stipulated for Section 1.2 (2), (3) and (4) of this ESCP and thereafter implement the WMP throughout Project implementation. 	<ol style="list-style-type: none"> Eskom

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>3. Adopt and implement waste management practices, consistent with ESS3, as part of the specific ESMPs referred to in Section 1.2 (5), 1.2(6) and 1.2(7) of this ESCP.</p> <p>4. Adopt and implement waste management practices, consistent with ESS3, as part of the sub-project specific ESA instruments referred to in Section 1.2 (10).</p>	<p>3. As per the timeframe stipulated for Section 1.2 (5), 1.2(6) and 1.2(7) of this ESCP.</p> <p>4. As per timeframe stipulated for Section 1.2 (10) of this ESCP.</p>	
3.2	<p>CONTAMINATED LAND</p> <p>As part of the ESIA and ESMPs referred to in Section 1.2 (2) and (3) of this ESCP, undertake a comprehensive land contamination study for Parts A and B of the Project, to evaluate, among other pollutants, the presence of arsenic, cadmium, chromium, iron, lead, mercury, nickel, selenium, manganese, and zinc from the ash and coal storage areas; polychlorinated biphenyls (PCB), polycyclic aromatic hydrocarbon (PAH), benzene, toluene, ethylbenzene, and xylene (BTEX), and other petroleum hydrocarbons from oil storage and mechanical and electrical equipment; and copper, iron, nickel, chromium and zinc from metal cleaning and cooling tower blowdown waste water, and prepare, adopt, and implement a detailed and comprehensive site remediation plan consistent with the requirements of ESS 3 and World Bank Group EHS guidelines and to the satisfaction of the Bank.</p>	As per the timeframe stipulated for Section 1.2 (2) and (3) of this ESCP.	Eskom
3.3	<p>ASH DAM FACILITIES (ADFs) AND ASSOCIATED POLLUTION CONTROL DAMS</p> <p>The ESIA and ESMP referred to in Section 1.2 (2) of this ESCP shall include provisions for the closure, rehabilitation, and long-term monitoring of the Ash Disposal Facilities, including the asbestos facility, consistent with the ESSs and to the satisfaction of the Bank.</p>	As per the timeframe stipulated for Section 1.2 (2) of this ESCP.	Eskom
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>1. As part of the ESIA and ESMP referred to in Section 1.2 (2), (3) and (4), of this ESCP, undertake a traffic assessment and prepare a traffic management plan, based on the assessment, if needed.</p> <p>2. In addition to the above plan, prepare a separate traffic management plan and risk assessment for the transportation of hazardous materials and waste, consistent with ESS3 and ESS4, national laws and Good International Industry Practices (GIIP) such as ADR Best Practices for transportation of dangerous goods by road.</p>	<p>1. As per the timeframe stipulated for Sections 1.2 (2), (3), and (4) of this ESCP.</p> <p>2. As per the timeframes stipulated for Section 1.3 (2) of this ESCP.</p>	Eskom

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <ol style="list-style-type: none"> 1. Consistent with ESS4, assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, demolition and blasting of major structures, behavior of Project workers, risks of labor influx and response to emergency situations, and include mitigation measures in the ESMPs to be prepared under Section 1.2 (1), (2), (3) and (4) of this ESCP. 2. Consistent with ESS4, assess and manage specific risks and impacts to the community arising from Project activities under Part C of the Project, including, inter alia, behavior of Project workers, risks of labor influx and response to emergency situations, and include mitigation measures in the specific ESMPs to be prepared under Section 1.2 (5), 1.2(6) and 1.2(7) and the include requirements for assessing impacts of community risk as part of the ESMF referred to in Section 1.2. (9) of this ESCP. 3. Ensure the assessment of risk and impacts to the communities, consistent with ESS 4, are incorporated and implemented, as part of the sub-project specific ESA instruments for Part C of the Project referred to in Section 1.2 (10) of this ESCP to the satisfaction of the Bank 	<ol style="list-style-type: none"> 1. As per the timeframes stipulated for Section 1.2 (1), (2), (3) and (4) of this ESCP. 2. As per the timeframe stipulated for Section 1.2 (5), 1.2(6) and 1.2(7) and Section 1.2(9) of this ESCP. 3. As per the timeframe stipulated for Section 1.2 (10) of this ESCP. 	Eskom
4.3	<p>SEXUAL ABUSE AND EXPLOITATION AND SEXUAL HARRASSMENT</p> <ol style="list-style-type: none"> 1. Adopt and implement policies and procedures against sexual abuse and exploitation/sexual harassment (SEA/SH) in accordance with the ESSs and consistent with the requirements of national laws, Eskom’s HR procedures, the World Bank’s Good Practice Note on ‘Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works’. 2. Include in site-specific ESMPs measures to prevent and mitigate risks of sexual exploitation and abuse and sexual harassment (SEA/SH) in line measures to be included in the ESMF, referred to in Section 1.2(10) of this ESCP and enforce their implementation. This includes but is not limited to development and adherence to Code of Conduct for all employees, GBV-sensitized grievance mechanism, awareness raising of all employees and community members on GBV risks and mitigation measures. 	<ol style="list-style-type: none"> 1. Adopt SEA/SH related policies and procedures as part of the E&S instruments under 1.2 and 2.1. 2. Include during initial preparation of each ESMP and enforce throughout Project implementation. 	Eskom, EPC contractor (for Parts A and B of the Project) and Service Provider for Part C of the Project.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.4	<p>SECURITY MANAGEMENT</p> <p>Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities, as set out in the ESMP, in accordance with ESS4 and guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.</p>	Assess risks and adopt measures prior to engaging security personnel and thereafter implement them throughout Project implementation	Eskom
4.6	<p>ASH DAM FACILITY (ADF)</p> <p>As part of the ESIA, referred to in Section 1.2(2) of this ESCP assess the safety risk associated with the closure and installation of renewable energy on the ADFs for Part A of the Project, and implement the recommendations from the engineering report as part of the closure and maintenance plan of the ADF.</p>	As per the timeframe for Section 1.2 (2) of this ESCP.	Eskom
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT PLANS</p> <ol style="list-style-type: none"> There is currently no design identifying the need for land acquisition under the Project. If, however, land acquisition becomes necessary, it shall be undertaken in accordance with the requirements of ESS5 and in a manner acceptable to the Bank, using to the extent possible a ‘willing buyer, willing seller’ approach consistent with ESS5. If involuntary resettlement becomes unavoidable once the technical designs for Parts A and B of the Project are available, a Resettlement Action Plan shall be prepared in accordance with ESS5 and to the satisfaction of the Bank, consulted, disclosed and implemented prior to any displacement or relocation. 	<ol style="list-style-type: none"> Throughout Project implementation. If a Resettlement Action Plan is required pursuant to ESS5 in light of the ESIA results, it shall be prepared by Eskom, cleared by the Bank, and disclosed prior to disbursement for Parts A and B of the Project. No displacement or relocation shall take place before approval, disclosure, and implementation of the corresponding RAP, including payment to affected persons before displacement. 	Eskom with support from Guarantor
5.3	<p>GRIEVANCE MECHANISM</p> <p>The grievance mechanism (GM) to address resettlement related complaints shall be described in the SEP referred to in Section 10.1 of this ESCP.</p>	On timeframe specified in Sections 10.1 and 10.2 of this ESCP.	Eskom
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <ol style="list-style-type: none"> 1. The ESIA and ESMPs referred to in Section 1.2(2)-(4) and ESMF referred to in Section 1.2(9) must include provisions for assessing potential impacts of the Project on biodiversity, including specifically the areas in and around the drainage lines, and mitigation measures consistent with the mitigation hierarchy and ESS6 2. Prepare, adopt, and implement a wetland rehabilitation and alien invasive species eradication and management plan, and biodiversity management plan consistent with ESS6 as part of the ESMPs referred to in Section 1.2 (2)–(3) of this ESCP. 3. Undertake a bird and bat impact assessment, in line with good international industry practices for wind energy projects, as part of the ESIA and ESMP referred to in Section 1.2 (4) of this ESCP. 	<ol style="list-style-type: none"> 1. As per the timeframe for Sections 1.2(2)-(4) and 1.2(9). 2. Prepare in accordance with the timeframe for Section 1.2 (2)-(3) of this ESCP and thereafter implement the management plans throughout Project implementation. 3. Prepare and implement in accordance with the timeframe for Section 1.2 (4) of this ESCP. 	Eskom
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	Not relevant		
ESS 8: CULTURAL HERITAGE			
8.1	<p>CHANCE FINDS</p> <p>Develop, adopt, and implement chance finds procedures as part of the ESIA and ESMPs to be prepared under Section 1.2 (2-4), Section 1.2 (5) and Section 1.2 (6) of this ESCP.</p>	As per the timeframes for Section 1.2 (2 -6) of this ESCP and thereafter implement the procedures throughout Project implementation.	Eskom
ESS 9: FINANCIAL INTERMEDIARIES			
	Not applicable		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.</p>	A draft SEP was disclosed on August 29, 2022. It shall be updated based on stakeholder consultations and finalized no later than 1 month after the Project Effective Date and thereafter implemented throughout Project implementation.	Eskom

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	<p>The grievance mechanism became operational on August 29 2022, and shall be maintained and operated throughout Project implementation.</p>	<p>Eskom</p>
10.3	<p>CAPACITY SUPPORT (Training)</p> <p>Training shall be provided for ECU, JETO and Supervision Engineer employees involved in Project implementation as well as other contractors on, among other topics:</p> <ul style="list-style-type: none"> • Environment and Social Framework • Project ESHS Management System Requirements and Implementation • Labor Management Procedures • Contractor Management and Supervision • Stakeholder mapping and engagement and meaningful consultation • Grievance Redress Mechanism 	<p>Within 3 months from the first date of appointment of the supervision engineer, and within 3 months from the date of establishing the ECU and JETO units and thereafter throughout Project implementation as the need for such training arises</p>	<p>Eskom</p>