

**Capella Solar (BESS Project)- El Salvador
Updated Environmental and Social Action Plan (ESAP)**

No.	Aspect	Action	Deliverable	Delivery date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	ESMS Manual	1. Update the ESMS manual to i) clearly identify the management plans in place, detailing name of the plans, code, version, ii) include audits and reporting procedure and iii) be in line with the procedures included in the specific management plans.	1. Updated ESMS manual	1. Before the second disbursement of the BESS loan.
1.2	Permits	2. Obtain the environmental license for the BESS Project	2. Environmental License for the BESS Project	2. Before first disbursement of the BESS loan.
1.3	Policy	1. Implement the integrated environmental, social, health and safety ("ESHS") policy.	1. Evidence of implementation	1. Before Technical Completion
1.4	Identification of Risks and Impacts	1. Prepare and implement an Integrated Risk Assessment procedure that covers environmental, OHS, working, and local community conditions. 2. Prepare an environmental, social, and OHS risk matrix for the construction of the BESS Project and for the operation phase of both the BESS and Solar PV.	1. Integrated Risk Assessment procedure. 2. Evidence of implementation 3. Risk Matrix for the construction of the BESS Project 4. Risk Matrix for the operation of the BESS Project and the PV Plant	1-4 Technical Completion or the first disbursement of the BESS loan, whichever occurs first.
1.5	Management Programs	1. Update the Environmental Management Plan to i) include all environmental measures of the Project (fauna, flora, revegetated areas, bird houses, waste management, wastewater, water, etc.) and the measures included in the environmental management program agreed with MARN, iii) where applicable, reference to the specific plans, iv) avoid duplication of information, v) remove plans no longer applicable and vi) include monitoring and reporting aspects of each of the environmental aspects.	1. Updated Environmental Management Plan	1. Before Technical Completion
1.6	Organizational Capacity and Competency	1. Appoint an ESHS managing team at the corporate level (Capella) to oversee ESHS aspects of the Solar PV Plant and the BESS. 2. Appoint a social liaison officer at a Project level.	1. Evidence of appointment or hiring an ESHS team. 2. Evidence of the appointment of social liaison.	1. Before Technical Completion
1.7	Emergency Preparedness and Response	1. Update the Emergency Preparedness and Response Plan to include BESS emergency preparedness which shall incorporate the automatic and manual detection of gases, ventilation practices, extinguishing methods and information to gather before entry, and procedures outside the BESS containers 2. Develop and adopt a training program for the system operators during fire suppression system discharge on real and nuisance (non-fire) alarm situations. 3. Develop and implement a maintenance plan for the Life and Fire Safety ("L&FS") systems, which includes a management of change procedure for both the Solar PV Plant and BESS.	1. Updated Emergency Preparedness and Response Plan 2. Training program. 3. Evidence of adoption of training program. 4. L&FS Maintenance Plan 5. Evidence of adoption	1-5 Before Technical Completion
1.8	Monitoring and Review	1. Prepare and implement an environmental, social, labor, and OHS risk monitoring procedure, to include ESHS reporting for water source and consumption, fauna relocation activities, flora and revegetation status, waste management (generation, storage and disposal), wastewater disposed and monitoring the septic tanks, monitoring of the oil-water separators status, herbicide management, H&S and E&S workers training, security, emergency	1. Monitoring and evaluation procedure 2. Monitoring Matrix	1-2 Technical Completion or the first disbursement of the BESS loan, whichever occurs first.

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		drills carried out, local and women workforce and any other E&S or H&S issue. 2. Prepare a matrix to track compliance with key performance indicators on environmental, occupational health and safety, and social issues, including a) Safety - Lost Time Incident Frequency Rate; Lost days per million hours worked (LTISR); accident-free days (number of days since last lost time incident); b) sustainability: water use (m ³), waste and effluent monitoring; and c) social - number of environmental and social complaints from local communities.		
1.9	Stakeholder Engagement	1. Develop and implement a Stakeholder Engagement Plan (SEP) that includes, among others, the following: i) Community Relationship Program; ii) Communication Plan; iii) mapping and assessment of all relevant stakeholders; iv) needed for new meetings with local communities; v) an information office in the area and appoint a community liaison officer; and vi) a community liaison officer	1. Stakeholder Engagement Plan 2. Evidence of implementation	1-2 Before Technical Completion
1.10	External Communication and Grievance Mechanisms	1. Update the external grievance mechanism by i) excluding workers, ii) establishing guidelines for registering, analyzing, categorizing, investigating, choosing alternative solutions, and indicating the deadline for responses; and iii) defining how the mechanism will be publicized, so that local communities will know where to go and who to contact when required.	1. Updated External grievance mechanism 2. Evidence of implementation.	1-2 Before technical Completion
PS 2: Labor and Working Conditions				
2.1	Grievance Mechanism	1. Update the internal grievance mechanism to i) separate it from the external grievance mechanism, ii) establish guidelines for registering, analyzing, categorizing, investigating, choosing alternative solutions, and indicating the deadline for responses; iii) allow anonymous complaints, iv) stipulate that there will be no reprisals for complainants and v) guarantee the confidentiality of the complainant.	1. Internal Grievance Mechanism 2. Evidence of adoption.	1-2 Before Technical Completion
2.2	Occupational Health and Safety	1. Update and implement and Occupational Health and Safety ("OHS") Plan to include the construction and operation of the BESS Project	1. Updated OHS Plan. 2. Evidence of implementation.	1. Before the first disbursement of the BESS loan.
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Water Consumption	1. Update the Water Management Plan to contemplate the BESS water requirements.	1. Updated Water Management Plan	1. Before the first disbursement of the BESS loan.
3.2	Waste	1. Update the Waste Management Plan to: (i) incorporate the requirements in environmental regulations, the IFC performance standards, and the World Bank General Guidelines on the Environment, Health, and Safety; (ii) define initiatives of waste reduction and encourages reuse and recycling; (iii) define operational procedures and temporary storage controls for various types of waste (including effluents, solar panels and batteries); iv) define operational procedures and controls for treating and disposing of various types of waste; and v) identify companies hired to collect and dispose each type of waste.	1. Updated Waste Management Plan	1. Technical Completion or the first disbursement of the BESS loan, whichever occurs first.
3.3	Pesticide Use and Management	1. Assess different alternatives for vegetation control and management at the Plant. 2. Develop an integrated vegetation and pest management plan that includes provisions to: i) avoid use of chemicals by prioritizing mechanical means and, when not feasible, adopt substances with low impact on human health	1. Assessment of alternatives. 2. Integrated Vegetation and Pest Management Plan	1. Before Technical Completion

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		and the environment; ii) ensure techniques that promote/maintain healthy soil conditions; iii) ensure proper handling, storage and disposal of any chemicals used; iv) ensure adequate health and safety equipment and training of workers involved in the vegetation control management; and v) be applicable to both vegetation growth control in the panels area as to maintenance of vegetation planted outside the panels area.		
PS 4: Community Health, Safety, and Security				
4.1	Community Health and Safety	1. Install a BESS emergency shutdown switch.	1. Verification by a third party.	1. Before the second disbursement of the BESS loan.
4.2	Security Personnel	1. Modify the contracts with security firms to include the obligation to comply with The Voluntary Principles on Security and Human Rights and to ensure that security personnel is trained in accordance to those principles.	1. Contracts with Security Firms	1. Before Technical Completion
PS 6: 4.6 Biodiversity Conservation and Natural Habitats				
6.1	Biodiversity Conservation and Natural Habitats	<p>1. Implement the bird monitoring program ("BMP") to: i) complete the bird baseline information until at least May 2021; ii) determine if the Project's area of influence (plant and power line) is used by endangered and protected species present in the Jiquilisco IBA; and iii) assess bird mortality in the Project's area (PV plant and power line) for at least two years since the construction commencement.</p> <p>2. Upon the completion of the BMP, assess the need to implement mitigation strategies.</p> <p>3. Continue with the management and monitoring of the reforestation plan, including i) irrigation to ensure the plant survival for a minimum period of 3 years (until December 2023), in particular during dry season, ii) elimination of competing herbs, iii) trimming and fertilization.</p>	<p>1. Reports on BMP.</p> <p>2. Mitigation strategy if applicable</p> <p>3. Environmental Monitoring Reports</p>	<p>1. Quarterly until May 2021.</p> <p>2. June 2021.</p> <p>3. Annually until December 2023.</p>