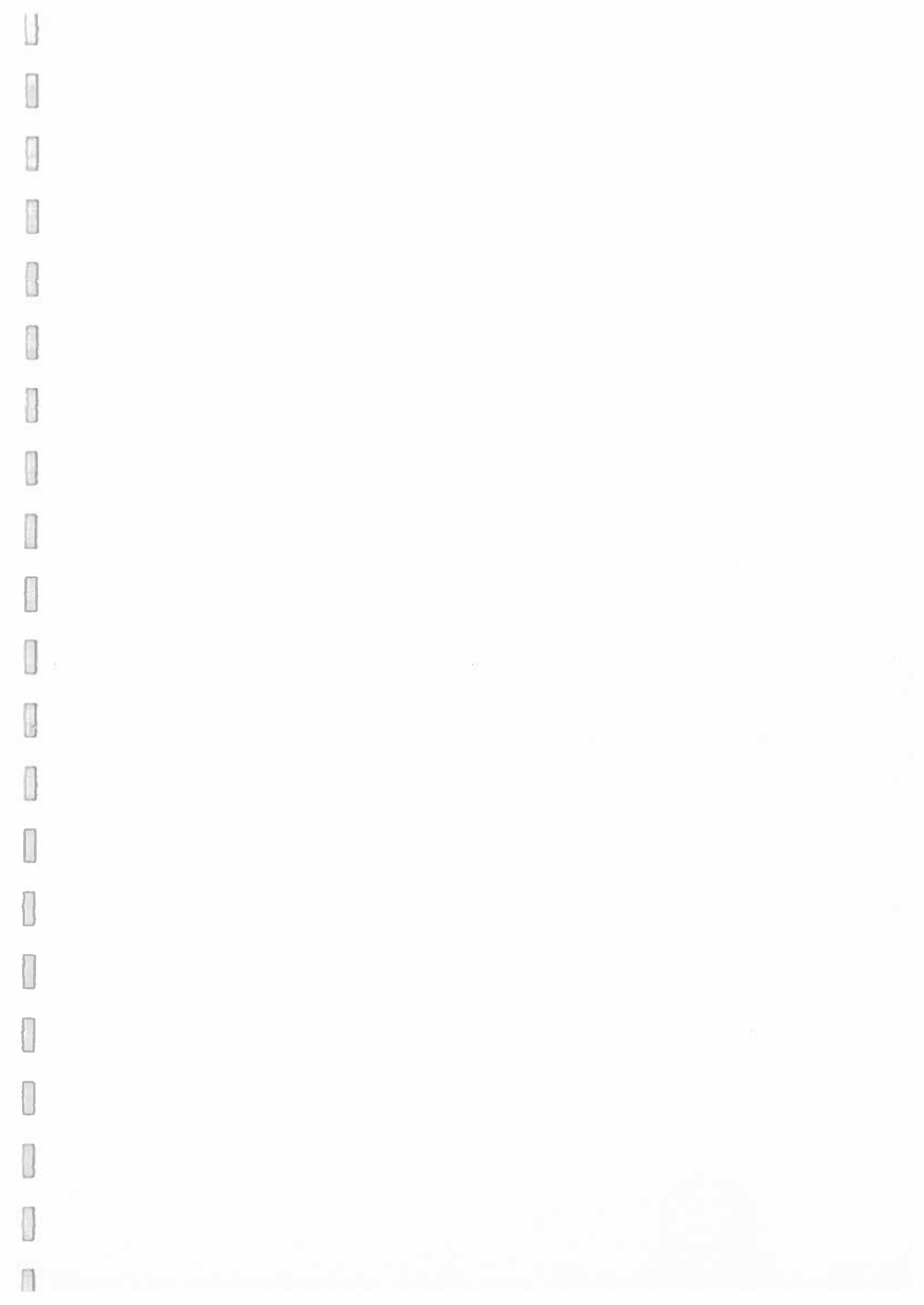


ANNEX L: MCA-NEPAL AND ETP PROJECT PROCEDURES



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## L.4.1a Procedure for Using the ETP Stakeholder Engagement Plan

### *Introduction*

MCC is committed to the principle of direct engagement with communities through the requirement that each selected country undertakes a timely, participatory and meaningful process of consultations with key stakeholders who are likely to be affected by the development and implementation of proposed compact programs. The MCC issued a Compact Development Guidance Report in February 2017 (<https://www.mcc.gov/resources/story/story-cdg>) in which Chapter 4 describes the MCC guidance on public consultations and stakeholder engagement. MCC requires that each country has engaged in a process of public consultation and stakeholder engagement that includes civil society organizations, the international and domestic private business community, and other international development agencies, among other stakeholders.

Further, The MCC Gender Policy requires that consultations be designed and implemented to allow both women and men meaningful opportunities to participate, gender analysis is used in involving stakeholders, and that evidence of participation in consultations throughout the compact development process is demonstrated.

### *Reference Standards*

The Stakeholder Engagement Plan and its internal grievance redress mechanism has been prepared as per the requirements and standards set out in:

- MCC environmental guidelines,
- MCC's Gender Policy and Gender Integration Guidelines,
- MCC's Counter Trafficking In Persons Policy,
- Guidance on the Implementation of Involuntary Resettlement (2008),
- IFC Performance Standards,
- Nepal regulations, and best practices from other projects in Nepal.

MCA-Nepal has developed a Stakeholder Engagement Plan and associated recording matrix for the project over the life of the project. The aim is to identify, plan, determine and record interactions with and regularly update information on all stakeholders affected by or interested in the project, including the management and resolution of project related grievances.

The intent of the SEP is to demonstrate informed stakeholder consultation and participation for the duration of the project. The SEP must be extended and updated over the life of the project and as such is a living document.

### *Purpose of Engagement during Construction*

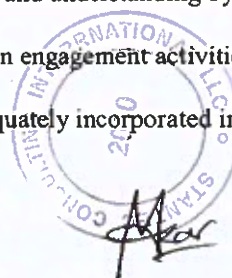
The intention of the SEP during construction is to ensure that the concerned stakeholder groups have an understanding and are informed of all engineering related work including construction, further Geotech surveys, LIDAR, ground level route alignment surveys (if required), bio-diversity and environmental sampling surveys etc. The engagement activities in this phase of the project is critical to ensure the 'social license to operate' for the project and potential for delays reduced. The information disseminated under the SEP is managed through the public information and dissemination component of that plan, for which compliance is also required.

The purpose of the engagement activities at this stage of the project is as follows:

- To obtain and retain the regulatory permits and formal/ informal consents from the various stakeholders, as required;
- To conduct engagements – meetings, announcements, contacts etc. visits to international best practice standards.
- To allow stakeholder groups to understand the implementation of the project, its key components, timing, purpose as well as the potential risks and impacts (positive and negative) on the stakeholder groups. This allows for informed engagement, consultation and understanding by stakeholders through the life of the project;
- To allow for the stakeholder groups to actively participate in engagement activities as part of the present project phase;
- To ensure that the stakeholder feedback and inputs are adequately incorporated into the project management plans;



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- To provide the stakeholder groups, especially the project affected families, local community, impacted CFUGs and vulnerable groups' information on the ongoing social and environmental mitigation measures identified as part of the management plans for the project.

**Scope of Stakeholder Engagement during Construction**

The Stakeholder Engagement Plan covers:

1. Identification of stakeholders, updating and maintenance of contacts matrix.
2. Process for initiating contacts with stakeholders.
3. Programming and conduct of meetings, information exchange, participation in project activities.
4. Recording information and discussions/ communications on areas of interest of stakeholders, ensuring effective dissemination of SE information within the project entities in an appropriate and timely manner.
5. Methodologies for undertaking, recording and actioning issues raised during SEP activities.
6. Requirements for coordination, supervision and monitoring of contractor stakeholder engagements with and by MCA-N.
7. The SEP implements information designed and disseminated under its provisions for public information and dissemination, which must be adopted by each Contractor.

**Implementation**

Each Contractor must appoint a senior level Social Safeguards Manager/ Officer (and Community Liaison team as appropriate to the level of activity) to manage stakeholder engagements prior to mobilisation. The Contractor must:

- Adopt the Stakeholder Engagement Plan and methodologies developed.
- To the best extent possible, takeover the employment and deployment of the District CLO, trained and deployed during the project development phase. as the Contractor's local level representative as part of the Contractor's social safeguards team.
- Liaise with the MCA-Nepal social safeguards team prior to mobilisation to be briefed on the SEP process, required methodologies and recording mechanisms.
- Prior to any survey, field or construction work, the Contractor CLO(s) and MCA-Nepal ESP on-site Community Assistant must liaise and inform and obtain any required permissions from the district and local authorities as well as the communities.
- Record and report stakeholder engagements as required by MCA-N.
- Participate in and use the project wide grievance redress mechanism as required by MCA-N.
- Maintain, staff and support the Public Information Centre set up under the project design phase.

**Process for Implementing the SEP**

**Actions and Responsibilities for Stakeholder Engagement**

Step	Action	Responsibility
1	Adoption of stakeholder engagement matrix for Districts, Municipalities, Wards and PAPs in affected area	Contractor
2	Ensure harmonising of stakeholder matrices, liaison with MCA-Nepal Communication Specialist and MCA-Nepal Project manager	Contractor
3	Review and update lists of stakeholders from MCA-Nepal SEP matrix	Contractor
4	Add stakeholders groups by level of interest/ impact against location and interests	Contractor
5	Align methodologies for appropriate contact and notification periods for stakeholder groups with those of MCA-Nepal to ensure continuity of awareness and participation using procedures in Annex C 4.2 Procedure for Undertaking Community Engagement	Contractor
6	Compile a Stakeholder Engagement Manual listing MCA-Nepal compatible processes defining: <ul style="list-style-type: none"> <li>• Roles and Responsibilities</li> <li>• Management</li> <li>• Training</li> <li>• Resources required</li> <li>• Cooperation and communication channels within ETP</li> <li>• Planning tasks</li> <li>• Training</li> <li>• Recording</li> </ul>	Contractor

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Step	Action	Responsibility
	<ul style="list-style-type: none"> <li>Reporting</li> <li>Monitoring</li> </ul>	
7	Agree the SEP Manual with MCA-N	MCA-N
8	Estimate information/ communication requirements, numbers of meetings required and reporting requirements at which level/ group over the life of the ETP construction period as per the SE Manual	Contractor
9	Estimate planning requirements, costs and logistics required for community and stakeholder engagements	Contractor
10	Integrate meeting purpose and information/ participation requirements with MCA-Nepal public information and dissemination component of the SEP as per Procedure in Annex C.4.1c	Contractor
11	Calculate and agree budget for SEP activities	Contractor
12	Adopt, update and implement the project Grievance Redress Mechanism – use the detailed Procedure in Annex C.4.4	Contractor
13	Calculate and agree budget for SEP activities	Contractor
14	Update the SEP throughout project life	Contractor
15	Regular consultation of MCA-Nepal ESP Specialist (Land Acquisition), ESP-CAs and Quality Assurance Managers	Contractor
16	Submit SEP to MCA-N	Contractor
17	MCA-Nepal review	MCA-N
18	MCA-Nepal review and approval	MCA-N

#### L.4.1b Procedure for Undertaking Community Engagement

##### Introduction

Stakeholder/ Community sensitivities are high in projects involving loss of land, relocation and potential employment opportunities. These sensitivities are best managed by careful, considerate engagement that demonstrates willingness to include communities and encourage participation in planning and implementation as far as possible.

This procedure is designed to promote international best practice in stakeholder/ community interactions – casual encounters, meetings for whatever purpose, specific consultations etc. - and ensure harmonisation with the methodologies and reporting mechanisms for stakeholder/ community engagement developed for ETP by MCA-Nepal and with reference to the same standards.

The procedure is compliant with international standards prescribed under the IFC Performance Standards 1-8 (as appropriate to context) and their guidelines, as required by the Millennium Challenge Corporation. It is intended that this procedure is integral to the Contractor's Stakeholder Engagement Manual mandated in this ESHSMP for guiding stakeholder engagement. Of particular relevance to this procedure is IFC PS 7 Guidance on interactions with Indigenous Peoples.

##### Principles

The principle and practice of Free, Prior Informed Consent (FPIC) prescribed in IFC PS 7 requires the utmost highest standards of community engagement to achieve the best levels of understanding and involvement by all communities impacted by the project. IFC PS 7 requires that all persons – not just indigenous groups - are informed, consulted and enabled to participate in project planning and implementation through:

- Engagements conducted in languages used by the community
- Timely contacts allowing sufficient time for awareness, attendance and comprehension
- Sufficient engagements to ensure full understanding and participation by all sub groups
- Materials designed for both literate and non-literate
- Use of appropriate media to maximise engagement – radio, newspapers, noticeboards, regular advice meetings, specific topic engagements etc.
- Ensuring full information to concerned GoN Administrative Offices at all levels of decentralised Government
- Outreach to civil society organisations and umbrella interest groups
- Inclusion of key persons of community influence.



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**Purpose**

The procedure intends and requires that all engagements are conducted with respect, politeness and consideration. Engagements envisaged under this Procedure are anticipated to be:

- Casual meetings,
- Complaints presentation
- Formal meetings,
- Interviews for whatever purpose,
- Surveys,
- Consultations,
- Participatory planning.

Engagements are expected to reach all ethnic and indigenous groups equally and are to be conducted in languages understood by participants with the use of interpreters where needed. There must be no discrimination in contact or communication on the basis of gender, ethnicity, minority status, language, education, religious belief, sexual orientation, political influence, wealth, health, (dis)ability or age. Ensuring that no discrimination occurs requires commitment and imagination, flexibility and willingness on the part of the Contractor to adapt processes to local circumstance and to actively investigate ways in which community groups may be excluded from each engagement.

**Process for Undertaking Community Engagement**

The objective of the procedure described below is to enforce best practice in community contacts and reducing community anxieties and concerns that may evolve into pressure on the project and delays in construction. Further, this procedure is intended to ensure that engagements are properly planned, conducted and recorded such that the objective above is fulfilled and demonstrated to be achieved.

The procedure is envisaged to apply to all forms of local contact at Municipality and ward levels in casual contacts/ informal meetings, more formal community meetings and smaller focus group consultations for all ethnic groups, IP status, location and degree of project impact. The procedure looks first at the planning and modalities for communicating through community meetings, and secondly at the requirements to be fulfilled when reporting chance encounters or individual conversations/ informal meetings.

MCA-Nepal require compliance with these Procedures in order to promote:

- Best quality interactions,
- Maximise community satisfaction with ETP,
- Reduce duplication of effort, confusion, misunderstandings and delays to construction
- Ensure that all ETP partners and MCA-Nepal are aware of and participate (where necessary) in community engagements.
- Ensure that communities are approached and engagements set up to the high standards expected by MCA-N.
- Records of all engagement are made, kept, stored and shared between ETP partner organisations.

**Steps to undertake community engagement**

Step	Action	Responsibility
<b>Formal Meetings</b>		
1	For each phase of ETP, Review work schedule requirements for community interactions Plan community engagement – SEP matrix, meeting purpose, location, audience/ attendance, key invitees, translators, resources, Contractor and Other project partner staff required.	Contractor
2	Liaise with MCA-N ESP Specialist (Land Acquisition) so as to collaborate, reduce duplicated efforts	MCA-N



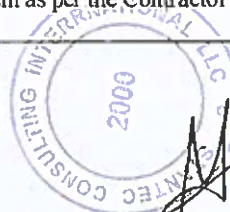
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Step	Action	Responsibility
3	Plan the engagement activities – consultation, participatory design, monitoring, verification, grievance resolution	Contractor
4	Plan/ design materials and key information/ messages to be disseminated.	Contractor
5	Estimate the required budget and agree within the contracting organisation	Contractor
6	Liaise with MCA-N ESP Specialist (Land Acquisition) and agree format, wording of each meeting/ message and engagement plans	MCA-N
7	Liaise with ESP-CAs to make arrangements for meetings etc. Agree responsibilities for booking venues, informing GoN administrative officials, issuing invitations, translators, minutes taking and attendance recording	Contractor
8	Make bookings for venues, hire or arrange support staff/ translators, produce meeting support materials, make media announcements, book resources as required, ensure set up time is planned for.	Contractor
9	Draft a meeting planning note setting out the agenda - topics to be discussed, meeting facilitation, translation and order of discussion.	Contractor
10	Deliver specific invitations to meetings or announce the arrangements for a general meeting through multiple ways, letters, telephone calls, personal visits, and radio and media announcements as appropriate – record invitations issued. Ensure sufficient notice is given for people to make arrangements to attend and to request access arrangements, make transport arrangements, request specific translators etc.	Contractor
11	Set up the room where required, ensure a note taker is present, set up recording machines where appropriate and where communities agree. Set up attendance list compilation.	Contractor
12	Introduce the meeting, introduce speakers, distribute copies of the agenda where appropriate, and describe the topics to be discussed and the order of discussion and opportunities for community discussion and involvement in the meeting.	Contractor
13	Undertake the engagement, ensuring all parties get the opportunity to present opinions and information, ensure women, disadvantaged and marginalised groups have the opportunity to participate, if necessary, plan for small groups/ meetings where community discrimination may prevent some groups from attending or speaking.	Contractor
14	At the conclusion of the meeting, thank all attendees, give feedback through a summary of topics discussed, information exchanged, actions agreed and areas of disagreement. State next steps and information on where and when the next project progress will happen.	Contractor
15	Write up the meeting notes on the standard meeting note proforma within 24 hours	Contractor
16	Distribute meeting notes as agreed with MCA-Nepal to participants and project entities and ensure actions agreed are programmed into Contractor or MCA-Nepal activities, ensure external bodies are informed according to need and prior agreement.	Contractor
<b>Casual meetings/ Informal meetings:</b>		
17	As soon as an unplanned engagement has occurred at whatever level, on whatever subject and at what length, the Contractor's concerned individual must make a meeting note on the agreed meeting note proforma recording: Location, date, All persons' names and organisations where appropriate. Notes of information exchanged Notes of agreed outcomes or actions Note on who this information is to be passed for action, recording and filing	
18	The supervisor receiving the note must log the note with the MCA-Nepal and the Contractors stakeholder engagement team	
19	Note with actions must be recorded in the IMS as organised, ensuring that the note is included in the file for each appropriate community	
<b>For all meetings</b>		
20	Maintain a filing system – on paper and digitally of all community engagements – on paper in the Public Information centre and Contractor's District Project Offices, digitally on the ETP Information management system as per the Contractor's Stakeholder Engagement Manual for ETP	Contractor



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#### L.4.1c Procedure for Public Information and Dissemination Plan

##### *Introduction*

The MCA-Nepal has a project specific component of public information and dissemination (PID) as required by international policies and standards as described below. The Public Information and Dissemination plan for ETP has been written to manage all project related communications and system of message delivery to ensure accuracy and consistency in message delivery throughout the whole project. The ETP PID requires contractors to manage all public information activities to the design and quality standards of the plan through the MCA-Nepal vetting, approval and, where appropriate, procurement processes. It is required that this procedure is implemented in close cooperation and integration with Procedure C4.1 on Using the ETP Stakeholder Engagement Plan.

MCA-Nepal is aware of the ETP related issues and potential for delays to construction through the poor management and poor quality of information dissemination. To reduce damage to the MCA-Nepal reputation, public perceptions of ETP and impacts on the project achievement on schedule, MCA-Nepal requires the contractor to incorporate the ETP PID and its mechanisms in all public information activities. The range of activities envisaged are:

- Public Information Centre Activities and programmes
- Leaflets, brochures,
- Media announcements, radio broadcasts, community phone-ins on radio
- Newspaper articles,
- Official Notice Publications

##### *Reference Standards*

The IFC Performance Standards are the starting point for standards required for projects under the MCC organisation. The IFC Performance Standards are based on the World Bank Group Environmental, Health and Safety Guidelines (EHS Guidelines) and relevant Policies. The World Bank Policy OP/BP 4.12, Involuntary Resettlement, revised in April 2013, is the source document for ETP community interactions as these are caused by the need to acquire land through involuntary process of compulsory purchase. OP 4.12 requires compliance with the World Bank Policy on Disclosure of Information, 2010 which directs the ways in which project specific information is disseminated to communities and other stakeholders as affected by the project.

The MCC have adopted the IFC Performance Standards derived from the World Bank Policies and require their consistent and full adoption in the project process. MCA-Nepal have a Communications and Public Affairs Team with two Communication Specialists. Additionally, the ESP Environmental and Social Safeguards specialists with responsibilities for information outputs design and dissemination.

##### *Process for the Use of the ETP Public Information and Dissemination Process*

This procedure requires that all public information materials are designed and agreed with and approved by the MCA-Nepal team before dissemination as per the ETP Public Information and Dissemination Plan. The aim is ensure consistent high quality information is designed at the best standards possible, is delivered at the most appropriate time and manner, is uniform across all ETP elements and enables the project to have a single public relations process. The plan describes the processes for managing the information process over the life of the project and is mandatory for all implementing agencies.



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### Steps for Using the ETP Public Information and Dissemination Process

Step	Activity	Responsibility
1	Contractor Social Safeguards Team discuss communication and information needs and the ETP plan with MCA-Nepal Communication Specialists and ESP Team	
2	Define and list all types of messages to be delivered to stakeholders over each project phase by audience type	
3	Agree substance of messages, delivery mechanisms and format with MCA-Nepal PM and Specialists Team	
4	Design message text, media, language, costs and production schedule	
4.1	Consider purpose of the communication, language, media, illustrations, suitability for literate/ non literate audiences, delivery agent	
4.2	Pilot material designs prior to production for quality, comprehension and achievement of purpose – consult and include CLOs and ESP-CAs in design process	
5	Agreement for budget for activity within Contracting organisation	
6	MCA-Nepal Draft and arrange publication of Official notices, including the following whose content is as below	MCA-N
7	Specific Items needing Contractor publication	
7.1	Message on works commencement, schedule, inputs from bodies, contact points, information points, grievance process	
7.2	Message on use and maintenance of the Public Information Centre, access to Community Liaison Officers, rights to assistance	
7.3	Detailed message on entitlement to compensation for contractor caused damage and process	
7.4	Message on how to use Grievance Redress Mechanism/ complaints forms	
7.5	Messages updating works progress	
7.6	Other progress messages	
7.7	Frequently Asked Questions leaflet – project wide – staff training	
7.8	Project General Information Brochure/ Leaflet	
7.9	Any other message as required	
8	Integrate progress reporting of communication plan implementation with MCA-Nepal project wide report process	
9	Produce communication materials	
10	Brief ESP-Community Assistants	
11	Implement message delivery programme	
12	Monitor message delivery, review and revise as required	

#### L.4.4 Procedure for Using the ETP Grievance Redress Mechanism

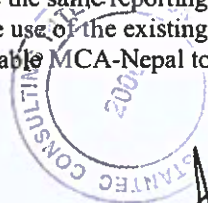
The ETP has a well-established and efficient Grievance Redress Mechanism in place. The ETP Grievance Redress Mechanism has been established and operated throughout the Design phase for ETP by all project partners. It provides a central system for receiving all complaints and managing the response and outcomes of grievances made to the project from all areas and to all partners.

A Grievance Redress Mechanism (GRM) is a required project process under World Bank Policies on Involuntary Resettlement, included therefore in IFC PS 5 and its guidelines and covers complaints about all aspects of the project over all phases. Reference to a requirement for an effective GRM is also made in the Nepal National Resettlement Policy – agreed by cabinet in 2015 but yet to be enacted into an updated Land Acquisition Act.

The GRM for ETP is designed and has been operated to date, as a way to receive and coordinate response to public complaints from all areas of all project related operations. The advantage is that MCA-Nepal are made aware of all complaints and can identify hot spots of concern and address problem areas at project-wide levels. All contractors are mandated to operate the same process, use the same reporting system through MCA-Nepal and ensure consistent approaches to grievance resolution. The use of the existing ETP GRM makes project wide monitoring, response and reporting easy to implement and enable MCA-Nepal to demand rectification of activities and working practices where these are identified.



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### ***ETP Grievance Redress Mechanism***

The ETP GRM recognises that the majority of complaints during construction arise through contractor/ affected person problems:

- Damage to property by contractor vehicles or staff
- Damage to the person from vehicle movements, poor contractor staff behaviour, theft, assault, incitation to trafficking in persons
- Damage to communities through poor worker behaviour at work camps
- Lack of access to employment for local people at local levels
- Perceptions of unfairness and/ or preferential benefit by sub-groups in the community.

Similarly, MCA-Nepal recognise that grievances come in a range of nature, scope and difficulty of resolution. Some grievances can be resolved through talking at local level, others require contractor level response, and others are project wide. Some responses can be agreed verbally, others require community or municipality level decision making, some are of wider scope than the project. Therefore a three tier response mechanism has been developed with central recording and devolved decision making responsibility.

### ***External Grievance Redress Mechanism***

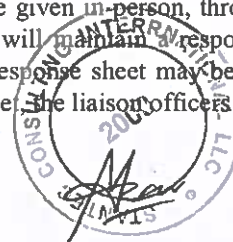
**Tier I:** The concerned party can lodge a complaint either to ESP On-Site Community Assistant or to the CLO. The ESP CA/CLO will record such complaint in the specified format and send it to the MCA-Nepal Grievance Coordinator and to PPTS team (National Resettlement Lead) via mail. In cases where email is not feasible, they may do so through a phone call. The CLO and ESP on-site CA shall update each other of every grievance that is registered.

ETP will make effort to addressing grievances internally to the extent possible. This will not only shorten the timeframe for grievance resolution but also strengthen the relationship between ETP and the communities. ESP CAs, CLOs or other project staff may also utilize the grievance form to submit an incident reports to summarize important issues or incident arising from field activities. The Internal Grievance Redressal (Tier-1) will have the following component.

- **Submission of grievance:** This process entails the concerned party submitting a grievance either by person at the PIC, by phone, letter, or in the following email: *ESP on-site CA, Phone Number, Email Address*  
The applicant may directly send grievances to MCN-Nepal on the following address:  
Yak & Yeti Complex  
Kathmandu, Nepal.  
Email: TBD  
Website: [www.mcanp.org.np](http://www.mcanp.org.np)
- **Register in grievance register:** The grievance register will be held at the PIC which will be managed by the CLO as well as at ESP on-site CA. The liaison officers (CLOs and ESP on-site CA) will register the grievance in the prescribed format.
- **Grievance is acknowledged:** The liaison officers through various medium (in person, grievance acknowledgement form, phone call or email) will acknowledge the grievance and seek clarification on the grievance if required. The liaison office (PIC and ESP on-site CA) will maintain a database of grievance acknowledgment form;
- **Notification and consultation with internal team:** CLO will notify and consult with ESP on-site CA (or vice versa) and notify the national resettlement expert in the Stantec team who will coordinate with MCA-N ESP Grievance Coordinator and the Stantec Project Lead. Given the geography and challenges of access and infrastructure, this will be done mostly through phone calls or through email when feasible. Given the nature of the grievance, the CLO and ESP on-site CA may decide on a solution in coordination with the national resettlement lead and notify the respective team;
- **Developing a response:** A response will be developed in consultation with the internal team and will be signed off by the respective CLO and ESP on-site CA. Response may be given in person, through a phone call or through email/fax where feasible. The PIC and ESP on-site CA will maintain a response sheet which the applicant can pick up at any given time. Where applicable, the response sheet may be posted/faxed to the complainant. In cases the applicant cannot pick up the response sheet, the liaison officers will consult with the complainant and agree on a best method.



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The liaison officers will ensure that the applicant has received the response and is satisfied with the response. If the applicant is not satisfied with the response, this can be further discussed internally. ETP will ensure multiple rounds of consultation between MCA-N/Stantec and the applicant in order to facilitate full understanding and collaboration on a solution prior to escalating issues. Each round of communication will be documented in the grievance form and database. ETP will take all feasible means to avoid escalation to Tier II. However, for reasons that a grievance cannot be solved at Tier I, it will be escalated to Tier II. The ETP team will also inform the CDO of such grievances and will provide them with a response letter.

- **Closing the grievance process:** The liaison officers will close the grievance process following the agreement on the solution and dispatch of the response.

The ETP team will provide an initial response within 7 days of the receipt of such complaints.

**Tier II:** In cases where the applicant is not satisfied with the decision of ETP team, the complaint will be forwarded to Municipality Grievance Committee (MGC) formed under the chairmanship of the chief of that particular ward. Other members of MGC include ESP On-Site CA, CLO, and LCF-coordinator (one man & one woman), Contractor representative Resettlement/ Environment national lead from PPTS (ESP Specialist from MCA-Nepal if required ) and others invitee as required . Given the severity of the grievance, MCA-N ESP Specialist and Municipal Chair may be invited to this committee.

ETP will encourage communities to form a LCF in each municipality to represent the affected communities. LCF will be formed as per the criteria established by ETP to ensure that women and vulnerable groups are represented within the committee.

LCF is a local level committee representing the project affected community. The affected communities will choose/elect their own LCF within each municipality. The criteria for LCF formation will be provided by MCA-N to ensure that the committee is well represented in terms of gender and communities that are affected by the proposed ETP. Some of the criteria may include a) at least one woman in the committee b) the committee should be representative of the communities affected by the proposed ETP c) the committee will be formalized through each municipality. However, criteria for LCF will be further discussed and finalized with MCA-N.

However, it should be noted that the communities at any time may form a Sarokar Samiti (Concerned Committee) along the proposed transmission corridor. ETP will consult with all registered concerned committees for feedback and suggestions.

The ETP team will provide an initial response within 15 days of the receipt of such complaints.

**Tier III:** If the applicant is not satisfied with the decision made by MGC, the grievance will be escalated to the District Level Grievance Committee (DGC) chaired by the CDO. Other members of DGC include District Coordination committee chair, Representative of Division forest office, District Land Survey office, District Land Revenue office, Mayor/Chair of RM/M, National Resettlement/Environmental from PPTS, ESP-Specialist MCA Nepal and other invitee as needed. The committee will coordinate with the affected municipality/rural municipality chair as needed and representative of the affected people or the Local Consultative Forum (LCF) as required.

The District level GRC will provide an initial response within 15 days of the receipt of such complaints.

For every level, ESP on-site CA and CLO will be responsible to document the entire process throughout grievance closing. The applicant can file the grievance with the court at any given time.

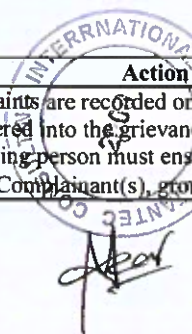
This is a separate plan and must be accessed and operated as laid out, the following table summarises responsibilities and requirements.

**Managing a Complaint**

Step	Responsibility	Timeframe	Action
1. Receiving a complaint: Complaints can be delivered	Any Community Liaison Officer (CLO), ESP-CA or Contractor	Day of receipt	All complaints are recorded on the complaint form and registered into the grievance management matrix The receiving person must ensure that all the facts: • Complainant(s), group, body



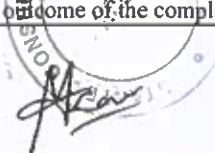
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Step	Responsibility	Timeframe	Action
verbally, by written letter or email.	or sub-Contractor employee		<ul style="list-style-type: none"> <li>• Details of the complaint and contact details</li> <li>• Accompanying papers if any</li> <li>• Date and place of complaint delivery</li> </ul> Are recorded on the complaint matrix form
2. Forwarding the complaint	The recipient of the complaint	Day of receipt	The complaint materials and complaint details form should be forwarded to the Construction Manager depending on site and nature of the complaint, Contractor's CLO and Contractor's Social safeguard team.
3. Notification of the complaint to MCA-N	Contractor's Social Safeguard Officer (CSSO)	Within 24 hours	CSSO contacts MCA-Nepal Grievance Officer and agree level of investigation and response required
4. Allocating responsibility for investigation	Contractor's Social Safeguard Officer (CSSO)	Within 24 hours of receipt	The CSSO and MCA-Nepal will allocate responsibility to a named team member – usually the CLO - for leading the investigation, setting the time frame for response and analysing the facts
5. Recording the Process	Responsible Investigator (CLO)	Within 24 hours of receipt	<p>An officer for recording complaints should be designated. The designated investigator will record all actions, requests for information from other departments and units on the stakeholder engagement grievance matrix and be responsible for recording all actions by all parties.</p> <p>In local level issues, The CSSO/ CLO is responsible for keeping records of such complaints on the stakeholder engagement grievance matrix and including details in monthly reports and reporting to MCA- Grievance Management Officer.</p>
6. Contacting the complainant	Responsible Investigator (CLO)	Within 48 hours of receipt by Responsible Investigator	The designated investigator will contact the complainant and inform them that their complaint is being investigated, that there is a process and how the complaint will be dealt with. The CLO can lead or assist.
7. Determination of the facts	Responsible Investigator (CLO)	Within 14 days	The responsible investigator must conduct a balanced inquiry into the allegations bearing in mind the rights, responsibilities and obligations of all parties. The investigator shall record the facts and outline appropriate lines of action and report to the CSSO and Construction manager.
8. Agreeing action	MCA-N, Construction Site Manager and CSSO	7 days of receipt of report	The Construction Manager/ CSSO/ MCA-Nepal will determine the response required, and if it can be dealt with locally, agree actions to be taken and assign responsibility for implementation and for communication of the result to the complainant as described as tier 1
<b>All tiers</b>			
9. Implementing action	Nominated Informing Officer/ CLO/ contractor unit	14 days from agreement by Construction Manager/ CSSO/ MCA-N	The officer, contractor or sub-contractor designated to perform remedial actions where these are appropriate and justified shall arrange for a budget and materials and labour for the remedial works or actions to be carried out or value of compensation to be paid.
10. Researching complainant satisfaction	Nominated Informing Officer/ CLO	7 days	The nominated informing officer is responsible for following up with the complainant to ascertain receipt of payment or satisfaction with the works and for informing the Construction Manager and MCA-Nepal if the remedial action is unacceptable.
11. Monitoring and evaluating the outcome	CLO	After follow up	Responsibility for monitoring and evaluating the outcome of the Grievance Process is by the MCA-Nepal Grievance Officer and is recorded in both the Grievance Matrix and the Stakeholder Engagement Matrix by MCA-N, reported back to the CSSO/ CLO and included in Contractors' reporting.
12. Ensuring transparency	CSSO	Monthly report	The CSSO will ensure transparency in making the process and outcome of the complaint investigation



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Step	Responsibility	Timeframe	Action
through the Stakeholder Engagement Policy			transparent and making public the findings using appropriate media.

### L.5.1a Land Access Release Protocol

Land acquired for the project is acquired using the legal acquisition process set out under the Land Acquisition Act (1977) and IFC PS 5. The land acquired for ETP will be acquired through the RAPs devised for this project and acquired as per the provisional design. The GON acquisition defines the process as:

1. Defining the plot boundaries and location and verification of the Land Survey Office Data per plot;
2. Verification of plot and plot boundaries for acquisition on the cadastral mapping versus modern GPS location of boundaries;
3. Reconciliation of area and redrawing cadastral map (if necessary);
4. Where a plot has to be subdivided, a resurvey has to be undertaken;
5. Household census and asset loss inventory;
6. Review of relevant documentation –
  - title holder ID,
  - possession of valid title deed,
  - correct names and spelling,
  - inheritance resolution – letters of administration of estates/ powers of attorney,
  - mortgage and loan encumbrances;
7. Assessment and valuation of losses;
8. District Compensation Determination Committee valuation of losses;
9. Agreement of valuation with land title holder, signing of compensation agreement;
10. Payment of compensation;
11. Start of land title transfer and purchase of replacement land;
12. Commencement of livelihood restoration;
13. Rebuilding of house;
14. Relocation of household to new location; and
15. Verification of Resettlement Completion.

The process is lengthy and can take 1 to 2 years to complete depending on the complexity. Where new houses have to be built, this can create additional delays to completion.

MCA-Nepal will hire a third party organisation to undertake a survey of affected households once the RIC states that completion has been achieved in a certain area/ group of plots.

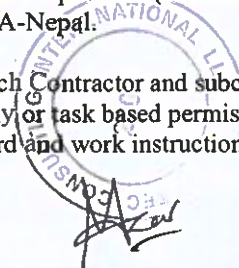
The Resettlement Verification survey visits 100 percent of affected families in the group of plots to be released together and checks that full payment of compensation has been received, that replacement land where required has been acquired, that eligible members of the household are entered into the selected livelihood restoration programme, that the household has moved to the new house – where applicable.

Once the verification survey team has reported successful completion of resettlement, the MCA-Nepal will issue a Land Access Release Permit per acquired plot. MCA-Nepal will group these permits into groups for handover to the Engineer or contractors. The permit will be signed by MCA-Nepal ESP Specialist (Land Acquisition), the Project Manager for the relevant site and the Environmental Specialist MCA-Nepal.

Copies of the Land Access Release Permit will be kept by the Engineer, each Contractor and subcontractor. The Land Access Release Permit shall be used to define access to land on a daily or task based permission to access land as per the Work Access Permit Protocol, Annex C.5.1b. Every job card and work instruction on site should



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have a copy of the land access release permit affixed so that all work teams know where the work is permitted and where not.

### L.5.1b Work Access Permit Protocol

MCA-Nepal requires all Contractors to prepare a Work Access Permit Protocol, which will apply to all areas where project activities will be located on acquired private land or in community or leasehold forest areas. The protocol will be applicable for the entire duration of each step of the project - from preparatory work to closure and site hand over.

The purpose of the worker access management protocol will be to manage and mitigate the risks associated with workers accessing new areas and providing clear guidelines on prohibited and permissible activities in situations where the workers are accessing private or community resources (e.g., Community Forests/Leasehold Forests/Religious Forests, community water sources, recreational areas, cultural sites).

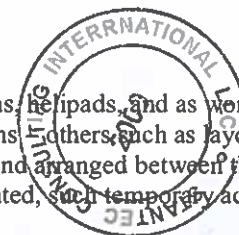
All Contractors will ensure that the following measures are all in place as a minimum.

- A list of permits, approvals, prohibited and restricted access (based on MCA-Nepal's guidance) for each construction site.
- Review and obtain all permits and approvals for accessing every new area for investigative or construction activities, prior to starting mobilisation.
- Obtain a Land Access Release Permit against plot identification, map and GPS coordinates showing what land is open to which sort of activity: this must follow the Land Access Release Protocol (Annex C.5.1a), and indicates completion of resettlement and release for construction.
- Provide each worker with an induction prior to the initiation of work at each new site. As part of this, an understanding shall be provided of the local customs and practices in the area, including prohibited and restricted access and use.
- Undertake regular tool box talks at the start of each work day. As part of these tool box talks, a reminder shall be provided of the prohibited activities and any specific access-related instructions including how to gain access to the plot and where access is not permitted.
- Implement the worker code of conduct.
- Restrict the workforce to their designated work areas, so as not to enter prohibited and restricted areas unless required for project purposes (when prior notice will be made to the communities by the Contractor, and with the permission of the person in charge).
- Require the use of existing trails and the processes to be followed for establishing new narrow trails to minimise soil disturbance.
- Prohibit unapproved tree clearing.
- Provide designated areas for the discarding of rubbish and remove from site, with random spot checks.
- Ensure adequate provision of cooking fuel, heating, lighting and food, to mitigate the risk of workers needing to access community forests for fuelwood or to buy excessive amounts from local shops.
- Ensure adequate arrangement of recreational activities for workers during non-working hours.
- Provide transportation for workers, from and to the work sites in cases where the camps are not located within the ROW.
- Put in place robust monitoring and patrolling provisions for the work sites. The possibility of engaging the local community in the monitoring process shall be explored, based on the regional context and risk levels. This must be decided in advance of starting work.
- Implement the Grievance Redress Mechanism.
- Provide the community with sufficient advance notice of each phase of construction activities, in keeping with the SEP requirements.

### L.5.2 Temporary Land Access Procedure

#### Overview

The Project will occupy and use land for storage, labour camps, laydown areas, helipads, and as work areas around each tower of the TL. Some areas will be needed for less than 6 months. Others, such as laydown, helipads and storage, may be taken on a voluntarily agreed long lease/rental and arranged between the Contractors and the Owners for periods longer than 6 months. If left unmitigated, such temporary access could



potentially have a major adverse impact on local communities and the environment. To ensure adequate mitigation is applied, the following measures are proposed, that adhere to National regulations<sup>1</sup>, MCC's guidelines and IFC's Performance Standards, as noted in Chapter 5.3 and referenced in the Resettlement Policy Framework.

### **Minimum Requirements**

The following general principles will apply to all temporary access sites throughout all project activities:

- The procedure covers all land use for less than 6 months, land needed longer than 6 months, even if intermittently will require a long term lease.
- Homestead areas, cultural sites and forest areas will be avoided to the extent feasible;
- Temporary land access will minimize the extent and duration of land requirement wherever feasible;
- Where there is more than one option, the preference will be first for barren government land, followed by fallow land. Cultivated land will be selected only as a last resort;
- If the land is cultivated, then avoid such lands where this is standing crop;
- The land footprint will include area required for access/entry; laydown areas for equipment; temporary storage needs; and the core work area. This footprint will be physically demarcated and fenced;
- Compensation for the demarcated land area will include a component of rental and replacement cost for crops or assets on the land cleared and/or damaged as agreed with the land owner. The negotiation will use the District rates for valuation of losses as agreed by the CDC as a minimum.
- Given that access for tower construction, erecting and stringing will require temporary land access around the tower pads in several phases, over the construction period, the Contractor/subcontractors will have the option of having a long term temporary access agreement with each owner/user to compensate them for loss of standing crops or potential crop loss for the period of occupation during Project activities;
- The grievance mechanism put in place at the District Public Information Centre of the district, within which the activity is being carried out, will be explained to the landowner prior to any access. Any inadvertent destruction of property or impacts from site activities will be handled under this grievance mechanism;
- The subcontractors will ensure that local authorities and land owners are consulted and their agreement to access the land area has been documented and the rental payment made and received prior to the commencement of activities; and
- The subcontractors is obligated to restore the land to its pre-activity status using properly agreed rehabilitation works and standards after the completion of construction phase works whilst within the rental period.

Assets under the scope of the TLA process include the following:

- All assets (crops, structures and trees), which are located within the demarcated area for temporary access.
- Fences and other structures demarcating areas belonging to the plot holder, will be avoided wherever possible, or otherwise will be replaced on completion of the works. Fences shall be built to demarcate the loaned area.
- Other assets (unproductive) such as boreholes, graves, sacred sites, structures etc will be avoided and fenced off during the temporary land access delineation.
- Other potential social impacts not resulting in actual physical damage may be managed via the Grievance Mechanism. Examples include: noise disturbance, traffic, labour influx, workforce behaviour etc.
- The ETP Chance Finds Procedure will be followed to avoid or minimize impacts to cultural, sacred and heritage sites.

### **Site Demarcation**

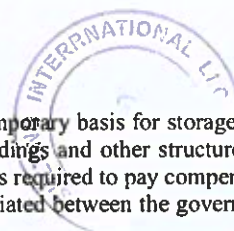
Temporary land access areas and plans will be provided by MCA-Nepal to subcontractors, for use during the construction phase. Should additional land be required by subcontractors for temporary use during the construction phase, the following siting criteria will be applied and the additional areas will be mutually agreed with MCA-Nepal, based on community consultations:

- No clearing of forest or residences;
- No impact to cultural sites;

<sup>1</sup> Public Roads Act 1974: This act empowers the government to acquire any land on a temporary basis for storage facilities, construction camps and so on during the construction and upgrading of roads. Any buildings and other structures such as houses, sheds, schools and temples are to be avoided wherever possible. The government is required to pay compensation for any damages caused to buildings, standing crops and trees. Compensation rates are negotiated between the government and the landowner.



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- No physical displacement;
- No significant grading;
- At least 200 m from the nearest residence;
- Outside any protected area;
- Not within any community forest; and
- Must have a voluntary agreement in place with property owner.

The agreed/planned temporary access areas will be demarcated on site in the presence of the land owners and/tenants, as applicable.

#### Compensation Assessment

The Contractor/subcontractors will:

- Identify the specific individual and/or community groups that have rights on the identified land parcels;
- Determine the type of rights on the affected land parcel (e.g. ownership being different from the actual use);
- Identify the stakeholder group who will be eligible for receiving compensation;
- Explain to the owners/other stakeholders the principles of temporary or long term lease land access and MCA-Nepal's Grievance Redress Mechanism;
- Identify the nature of use of the land and the specific assets to be affected due to the construction/access activities;
- Use rates for crops, trees and any other structures (potentially damaged) as used in the RAP, to assess compensation at replacement cost;
- Agree on this compensation rate with the land owner/entity – this will be documented in a separate/formal agreement and paid prior to entry to the land, the receipt shall be copied to the Engineer/ MCA-Nepal; and
- For construction phase access, if the use or access of the land by the Contractors exceeds 6 months of continuous occupation, a transition allowance as per the RPF of 1 year will be provided (extendable every 6 months thereafter) along with renewal of the rental agreements.

#### Access to Land

Once the temporary land access compensation evaluation has been performed, and the agreement has been signed on the compensation amount, the Contractors will provide a clear understanding of the timeline, start date and details of any rental agreement to be signed etc. Prior to initiating any work, the Contractors will demarcate the area required, so as to restrict the access to the land parcel and avoid any safety concerns for the local community. Where appropriate, signage shall be put up to inform the local community of the activities being undertaken and to restrict access to the area.

#### Restoration

Once the construction phase activities are complete, the Contractors will undertake the following:

- Restore the affected land parcel to its pre-activity status (i.e. refilling of "preserved" top soil; any other state as agreed with the land owner);
- Ensure that all personnel and equipment that were in use are to be moved out;
- Ensure that any temporary structures have been dismantled;
- Ensure that the affected individual/community group has validated closure of the activity on the land parcel. Get a written sign off form the owner/owners; and
- Obtain approval from the MCA-Nepal ESP-CA.

The final compensation amount for any due rental/access amount and for any unintended damage shall then be paid and the final receipt of acknowledgement shall be taken from the landowner.

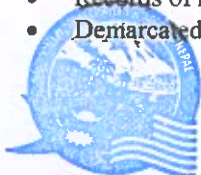
The TLA process will be supported by stakeholder engagement and the GRM. These are described in the Annex to the RPF.

#### Documentation and Record Keeping

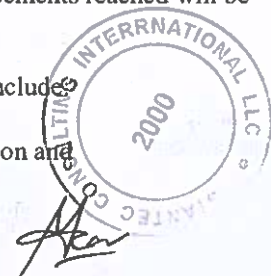
All communication and interaction with external stakeholders regarding temporary land access activities, before, during and after handover, will be clearly documented. Records will include the location, people consulted, summary of key points discussed, concerns, action items etc. Consensus and agreements reached will be documented and signed by the relevant stakeholders.

Key documents to be maintained by the subcontractors seeking land access will include:

- Records of key meetings;
- Demarcated Land Compensation Form for temporary land access compensation and



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- Permission for land access
- Payment Receipt
- Any rental agreement or contract with the land owner (if applicable); and
- Summary notes with photographs of the site before and after access along with any remarks.

**Record Form for Key Meetings**

Date	Location	Name of Representative	Key Discussion Points	Reference to Previous Actions or Commitments	Actions for the current meeting	Signature

**Demarcated Land Compensation Form**

Reference number of the form							
Location/Settlement/Ward/Municipality/District							
Date							
Asset owner's name/Lal purja Number/Identification Number							
<b>CROP</b>			<b>TREES</b>			<b>STRUCTURE</b>	
Crop type	Area	Amount (NPR)	Type of Trees	Number	Amount (NPR)	Type of Structure	Amount (NPR)
<b>Actual damage (to be completed if there has been accidental damage only)</b>							
<b>CROP</b>			<b>TREES</b>			<b>STRUCTURE</b>	
Crop type	Area	Amount (NPR)	Type of Trees	Number	Amount (NPR)	Type of Structure	Amount (NPR)
<b>Any other unintended damage:</b>							
<b>Total Compensation:</b>							
<b>Comments (if other type assets are found and photographic reference)</b>							
<ul style="list-style-type: none"> <li>• I _____ (Land user and/or asset owner), confirm that: <ul style="list-style-type: none"> <li>○ I own the above-detailed crops/fruit trees to be impacted by the _____ Project work;</li> <li>○ The asset inventory table completed above is accurate;</li> <li>○ I permit damages to the crops or trees for the duration of the required access in agreement that I will be compensated for any losses as stated; and</li> <li>○ I understood and agree with the compensation and grievance processes as explained by the subcontractor, in the presence of the ESP CA.</li> </ul> </li> <li>• I _____ (ESP CA), confirm that I have explained the compensation and grievance process to the Asset Owner and have left a copy of this form with them.</li> <li>• MCA-Nepal confirms that: <ul style="list-style-type: none"> <li>○ Compensation will be paid for losses to assets as a result of the _____ Project work using agreed rates (reference rates applied, to match replacement cost _____)</li> <li>○ In case of a formal rental payment, a separate rental agreement will be signed;</li> </ul> </li> </ul>							



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<ul style="list-style-type: none"> <li>○ Compensation will be paid before initiation of work and will be reassessed based on unintended damage at the time of completion of activities; and</li> <li>○ The contractor will restore the land.</li> </ul>			
Signature of subcontractor Representative	Signature of Land Owner	Signature of MCA-Nepal ESP CA	Signature of local ward secretary

**Payment Receipt Form**

Date			
TLA Form 2 Reference Number			
Rental Agreement Reference Number			
Total Payment before access			
Payment due			
Total Payment received			
Signature of Contractor Representative	Signature of Land Owner	Signature of MCA-Nepal ESP CA	Signature of local ward secretary

**L.5.4 Procedure for Managing the Environmental and Social Aspects of Tower Construction Sites**

The Contractor shall follow this procedure to ensure the compliant management of all environmental and social aspects of tower construction sites.

**Demarcation and Public Notice**

1. Before entering each tower site or initiating any ground disturbing activities, the Contractor shall obtain all required permits and approvals required for tower construction in accordance with relevant Nepal laws and regulations, applicable standards and environmental and social requirements.
2. The agreed and pegged tower construction site plus working area shall be demarcated using barrier tape.
3. An information board shall be prominently displayed at the edge of the site, where it is accessible to the public. The board shall describe the MCA-Nepal Grievance Redress Mechanism and provide contact information for both the Contractor and MCA-Nepal, where grievances can be filed. The information board shall also display the Worker Code of Conduct so that the community is fully aware of worker behaviour standards.

**Tower Access**

4. The Contractor shall prepare a Tower Construction Access Plan for each tower, for review and approval by MCA-Nepal. Tower access may involve one or more of the following methods: road access, trail access, helicopter access. The construction of any new access road or vehicular track is prohibited, unless approved by MCA-Nepal and the MOFE.
5. If access requires use of, or crossing of, private property, the Contractor shall execute a Temporary Access Agreement with willing landowners.
6. Tower access shall not involve the clearing of any forest not otherwise required to be cleared for tower construction or conductor stringing. All clearing of forest must be included in the ETP Forest Clearance Permit and any trees cleared shall be previously approved for clearing and marked by the Division of Forests.
7. Trail access shall not require any tree clearing. Trails are expected to be no more than 1.5 metres in width and suitable for use by porters, pack animals, and in some cases small motorised vehicles like motorcycles or ATVs. Gravel or crushed stone shall be used as needed to prevent rutting or erosion of the path.

**Tower Work Camps, Storage Areas, and Work Areas**

8. The Contractor shall designate an area near each tower to serve as a temporary work camp, storage area, and work area. This area shall be located within the project's ROW. If land within the ROW is not suitable (e.g. because it is too steep), then land outside the ROW can be used with the written permission of MCA-Nepal. In either case, the Contractor shall execute a Temporary Access Agreement with willing landowners.



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9. Tower work camps, storage areas, and work areas shall not require the clearing of any forest not included in the ETP Forest Clearance Permit and any trees previously approved for clearing and marked by the Division of Forests.
10. Effective sediment and erosion control measures shall be implemented during all site works, including the operation of camps and working areas, in accordance with the sediment and erosion control measures in Annex C.5.14a to C.5.14f.
11. All disturbed ground at tower construction sites, including camps and working areas, shall be cleared, restored and revegetated in accordance with the measures in Annex C.5.14a to C.5.14f.

#### Worker Accommodation

12. Tower construction workers are expected to camp at the work camps unless they are within walking distance of their own homes. Non-local workers shall only stay with local families where the family has obtained written approval from MCA-Nepal's ESP-CA.
13. The Contractor shall provide suitable tents and camping facilities for the tower workers.
14. Tower work camps shall have pit toilets with separate latrines for men and women. Urination or defecation in open areas or near water bodies by the workers is prohibited.
15. Potable water will be carried into the tower work camp. If local sources of water are proposed, the Contractors shall provide appropriate treatment and conduct monitoring to demonstrate that the water is suitable for potable use. Where there is any doubt about the quality of the water, the Contractor shall ensure that all water is boiled or chemically treated to make it potable in line with the Nepal national standards for human consumption.
16. The Contractor shall supply water to the worker accommodation without affecting the water supply of neighbouring towns and villages.
17. Power will be provided by a portable generator.
18. Gas fired stoves (e.g. propane) will be used for cooking and heating. No open fires are permitted.
19. Tower work camps shall have first aid supplies to treat non-emergency situations, as well as a snake bite kit.

#### Wastewater Treatment

20. The Contractors shall provide pit soakaways for domestic wastewater. These and the pit toilets shall be located at least 50 metres from any perennial streams or other waterbodies, and 100 metres from any wells or other potable water sources, to avoid contaminating them.
21. Untreated wastewater shall not be disposed into any water bodies.

#### Air Quality Management

22. Fugitive dust and particulate material emissions shall be minimised at all times to avoid impacts on surrounding communities, and especially to vulnerable people (e.g. children, elderly).
23. Surface clearing activities shall be restricted to the approved project footprint.
24. Diesel generators for power supply shall be optimally operated and regularly maintained to ensure emissions from fuel combustion remain at design levels.
25. Machinery shall be turned off when not in use.
26. Trucks transporting powder materials, such as cement and sand, shall have appropriate covers (e.g. tarpaulin sheets) to prevent the loads from spilling or blowing from the vehicle during transportation.
27. All stockpiles shall be covered.
28. Construction machinery and vehicles shall be properly maintained to minimise the emission of air pollutants.
29. Mandatory monthly maintenance activities shall be conducted for all vehicles, in accordance with manufacturer specifications.

#### Noise Abatement

30. Noise generating construction activities shall only be conducted between 6 am and 6 pm.
31. Night time construction activities are generally prohibited. However, there may be some limited circumstances when night time construction will be necessary for long-period tasks. In these cases, the Contractors shall comply with the following requirements:
  - The Contractor shall inform MCA-Nepal and obtain written permission for the night time construction task.
  - The Contractor shall notify local residents within potentially impacted areas in advance of proposed night time construction and explain the reasons and duration. The Contractor shall also explain the proposed mitigation measures.



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- Where there is a dwelling within 500 metres, temporary noise barriers shall be placed to reduce noise impacts at night.
- The Contractor shall arrange temporary accommodation away from the impacted area for vulnerable people, such as persons with illness and the elderly.
- 32. The Contractor shall perform regular (monthly) maintenance of construction equipment.
- 33. Properly designed silencers, mufflers, acoustically dampened panels and acoustic sheds or shields shall be used on all equipment. Mufflers and other noise control devices shall be repaired or replaced if defective.
- 34. Temporary noise barriers shall be used to reduce noise caused by construction equipment where necessary to bring it down to standard limits at receptor sites. Equipment known to emit a strong noise in one direction, shall when possible, be oriented to direct noise away from noise-sensitive receivers.
- 35. Deliveries and unloading of equipment and supplies by truck or helicopter shall occur only during daylight hours.
- 36. Machines and equipment in intermittent use shall be shut down between work periods or throttled down to a minimum.

#### Hazardous Materials and Waste Management

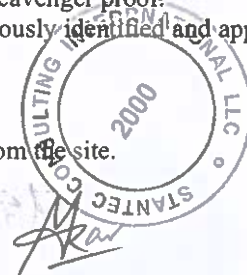
- 37. "Hazardous materials" covers all chemicals, including but not limited to diesel, gasoline, gases, lubricants, paints and cement.
- 38. The Contractor shall inform all employees of the emergency measures to be taken in case of spills or accidents due to the improper use of these substances in accordance with the provisions in the ESHSMP for spill prevention and response.
- 39. All hazardous materials shall be stored in manufacturer-prescribed containers.
- 40. Areas for the storage of fuel or lubricants shall have an impervious liner and bunding to prevent the escape of spills.
- 41. Leaking equipment shall be repaired immediately or shall be removed from the site for repair.
- 42. Liquid waste generated on site, such as lubricants, paints, cleaning chemicals and other aqueous oil-based materials, shall be collected separately, stored in a covered area in a suitable storage tank (i.e. on a impervious liner with appropriate secondary containment), and disposed of at a government-approved facility.
- 43. Cement shall be covered with tarpaulin sheets during non-working periods.
- 44. Concrete mixing shall not take place directly on the ground.
- 45. In case of spillage of mixed concrete, the area shall be cleaned immediately. The waste shall be collected and disposed of at sites approved by MCA-Nepal.
- 46. Unused cement bags shall be stored in a weather-proof area where they will not be affected by rain. Used (empty) cement bags shall be collected and stored in weatherproof containers to prevent windblown cement dust and water contamination. The bags shall not be used for any other purpose.
- 47. All excess concrete shall be removed from site on completion of concrete works. Washing of any excess concrete into the ground is not allowed.

#### Solid Waste Management

- 48. The Contractor shall establish a solid waste management system to ensure proper collection, segregation, and disposal of solid waste so that there is no contamination of soil or nearby waterbodies, or creation of public health issues.
- 49. The Contractor shall ensure that all facilities are maintained in a neat and tidy condition and the site shall be kept free of litter. Random disposal of solid waste from within or outside the project area shall be strictly prohibited.
- 50. At all places of work, the Contractor shall provide litter bins, containers, and refuse collection facilities for later disposal. Employees shall be educated on the segregation of waste with demarcated bins for recyclables, organic wastes and other materials placed in common areas.
- 51. Recyclable materials (e.g. wooden plates for trench works, steel, scaffolding material, site holding, packaging material, paper, empty cement bags, other containers, glass and wood), shall be collected and separated on site from other waste. Collected recyclable material shall be re-used or sold to a government-approved waste collector for recycling.
- 52. Waste storage containers shall be covered, tip-proof, weatherproof, and scavenger proof.
- 53. The disposal of construction debris shall be carried out only at sites previously identified and approved by MCA-Nepal.
- 54. Burning solid waste in open air conditions shall be strictly prohibited.
- 55. Trash and debris shall not be buried within fill or backfill areas.
- 56. Once construction is completed, all waste and debris shall be removed from the site.



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## L.5.5 Procedure for Managing the Environmental and Social Aspects of Substation Construction Sites

The Contractor shall follow this procedure to ensure the compliant management of all environmental and social aspects of substation construction sites.

### Demarcation and Public Notice

1. Before entering a substation site or initiating any ground disturbing activities, the Contractor shall obtain all required permits and approvals required for construction in accordance with relevant Nepal laws and regulations, applicable standards and environmental and social requirements.
2. The agreed and pegged tower construction site plus working area shall be demarcated using barrier tape.
3. An information board shall be prominently displayed at the edge of the site, where it is accessible to the public. The board shall describe the MCA-Nepal Grievance Redress Mechanism and provide contact information for both the Contractor and MCA-Nepal, where grievances can be filed. The information board shall also display the Worker Code of Conduct so that the community is fully aware of worker behaviour standards.
4. The Contractor shall prepare a Site Access Plan for review and approval by MCA-Nepal. Access shall be by one or two formally designated access roads. The construction of a new access road shall be as instructed by MCA-Nepal.

### Work Camps, Storage Areas, and Work Areas

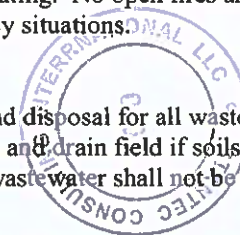
5. The Contractor shall designate an area of the site to serve as a temporary work camp, storage area, and work area. These areas shall be located entirely within the project's acquired land holding.
6. The Contractor shall submit to MCA-Nepal for approval the location and design for all substation worker accommodation, including dormitories, sanitary and toilet facilities, kitchens, canteens, laundry places, medical clinics, and leisure, telecommunications and security facilities. The detailed submission shall be at least two months before the planned start of the construction of these facilities. The worker accommodation and support facilities design shall be in general conformance with the IFC Guidance Note on Worker Accommodation: Processes and Standards (IFC and EBRD, 2009).
7. No part of a substation construction site shall require the clearing of any forest not included in the ETP Forest Clearance Permit and any trees previously approved for clearing and marked by the Division of Forests.
8. Effective sediment and erosion control measures shall be implemented during all site works, including the operation of camps and working areas, in accordance with the sediment and erosion control measures in Annex C.5.14a to C.5.14f.
9. All disturbed ground at tower construction sites, including camps and working areas, shall be cleared, restored and revegetated in accordance with the measures in Annex C.5.14a to C.5.14f.

### Worker Accommodation

10. Substation construction workers are expected to be accommodated at the work camps unless they are within walking distance of their own homes. Non-local workers shall only stay with local families where the family has obtained written approval from MCA-Nepal's ESP-CA.
11. The Contractor shall provide suitable semi-permanent residential facilities for the substation workers.
12. Potable water will be piped or carried into the work camp. If local sources of water are proposed, the Contractors shall provide appropriate treatment and conduct monitoring to demonstrate that the water is suitable for potable use. Where there is any doubt about the quality of the water, the Contractor shall ensure that all water is boiled or chemically treated to make it potable in line with the Nepal national standards for human consumption.
13. The Contractor shall supply water to the worker accommodation without affecting the water supply of neighbouring towns and villages.
14. Power will be provided from the grid or from a portable generator.
15. Gas fired stoves (e.g. propane) will be used for cooking and heating. No open fires are permitted.
16. Work camps shall have first aid supplies to treat non-emergency situations.

### Wastewater Treatment

17. The Contractor shall provide adequate wastewater treatment and disposal for all wastewater generated at the substation. This shall include either a large septic system and drain field if soils prove to be suitable, or a package wastewater treatment plant. Untreated wastewater shall not be disposed into any water bodies.



18. If septic systems are used for any residential labour camps, the septic tank and drain field shall be located at least 50 metres from any perennial streams or other waterbodies, and at least 100 metres from any wells or other sources of potable water, to avoid contaminating them.
19. If a package wastewater treatment plant is proposed, the effluent must meet the World Bank EHS Wastewater Guidelines (World Bank, April 30, 2007) and applicable Nepal regulations, whichever is more stringent.
20. Untreated wastewater shall not be disposed into any water bodies.
21. Urination or defecation in open areas or near water bodies by the workers is prohibited.

#### Air Quality Management

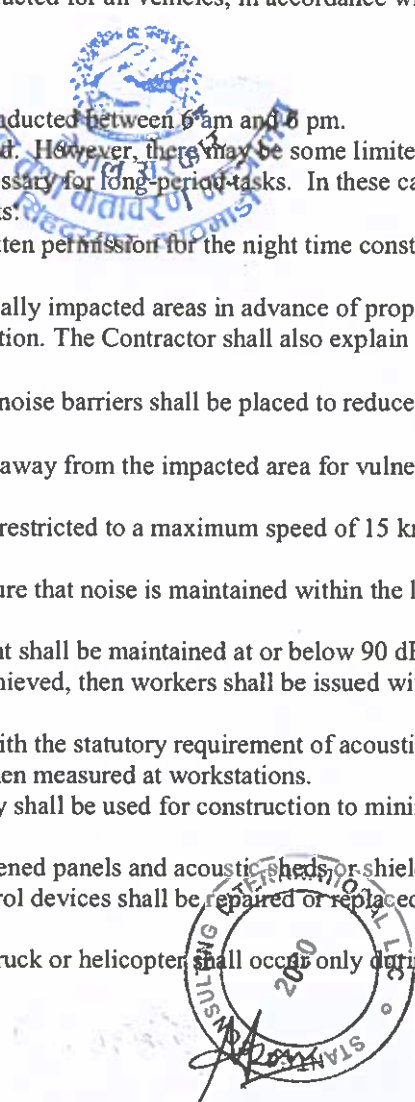
22. Fugitive dust and particulate material emissions shall be minimised at all times to avoid impacts on surrounding communities, and especially to vulnerable people (e.g. children, elderly).
23. Surface clearing activities shall be restricted to the approved project footprint.
24. Vehicle speed shall be restricted to 15 km/hr on site, to minimise the potential for dust generation in the surroundings.
25. Dust screens shall be placed as needed around construction areas within 200 metres of residential and other off site buildings.
26. Spraying of water shall be carried out as needed on unpaved roads, and over cut areas, stored soil and fill material.
27. Diesel generators for power supply shall be optimally operated and regularly maintained to ensure emissions from fuel combustion remain at design levels.
28. Machinery shall be turned off when not in use.
29. Trucks transporting powder materials, such as cement and sand, shall have appropriate covers (e.g. tarpaulin sheets) to prevent the loads from spilling or blowing from the vehicle during transportation.
30. All stockpiles shall be covered.
31. Construction machinery and vehicles shall be properly maintained to minimise the emission of air pollutants.
32. Mandatory monthly maintenance activities shall be conducted for all vehicles, in accordance with manufacturer specifications.

#### Noise Abatement

33. Noise generating construction activities shall only be conducted between 6 am and 6 pm.
34. Night time construction activities are generally prohibited. However, there may be some limited circumstances when night time construction will be necessary for long-period tasks. In these cases, the Contractors shall comply with the following requirements:
  - The Contractor shall inform MCA-Nepal and obtain written permission for the night time construction task.
  - The Contractor shall notify local residents within potentially impacted areas in advance of proposed night time construction and explain the reasons and duration. The Contractor shall also explain the proposed mitigation measures.
  - Where there is a dwelling within 500 metres, temporary noise barriers shall be placed to reduce noise impacts at night.
  - The Contractor shall arrange temporary accommodation away from the impacted area for vulnerable people, such as persons with illness and the elderly.
35. All construction-related traffic and site vehicles shall be restricted to a maximum speed of 15 km/hr on site and on roads within 200 metres of substations.
36. Noise barriers shall be installed at site boundaries to ensure that noise is maintained within the limits of the Nepal national standards at receptor locations.
37. Noise levels associated with all machinery and equipment shall be maintained at or below 90 dB(A) at locations where workers are present. If this cannot be achieved, then workers shall be issued with ear protection.
38. All diesel generators shall be installed in conformance with the statutory requirement of acoustic enclosures, to achieve the required norm of 75 dB(A) when measured at workstations.
39. Rubber paddings/ noise isolators at equipment/machinery shall be used for construction to minimize noise and vibration.
40. Properly designed silencers, mufflers, acoustically dampened panels and acoustic shields or shields shall be used on all equipment. Mufflers and other noise control devices shall be repaired or replaced if defective.
41. Deliveries and unloading of equipment and supplies by truck or helicopter shall occur only during daylight hours.



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42. Machines and equipment in intermittent use shall be shut down between work periods or throttled down to a minimum.
43. The Contractor shall perform regular (monthly) maintenance of construction equipment.

#### Hazardous Materials and Waste Management

44. "Hazardous materials" covers all chemicals, including but not limited to diesel, gasoline, gases, lubricants, paints and cement.
45. The Contractor shall inform all employees of the emergency measures to be taken in case of spills or accidents due to the improper use of these substances in accordance with the provisions in the ESHSMP for spill prevention and response.
46. All hazardous materials shall be stored in manufacturer-prescribed containers.
47. Areas for the storage of fuel or lubricants and any maintenance workshops shall be fenced and have an impervious floor to prevent the escape of spills.
48. Hazard signs indicating the nature of the stored materials (Material Safety Data Sheets - MSDS) shall be displayed on the storage facility or containment structure.
49. Hazardous materials storage areas and vehicle refuelling areas shall be at least 100 metres away from any water course.
50. Storm water runoff from areas of storage and use of hazardous materials and waste shall be discharged through oil separators and settling ponds.
51. Only appropriately trained personnel shall be authorised to handle hazardous materials.
52. Unloading from cement delivery trucks shall be done on pallets, which shall be covered with tarpaulin sheets during non-working periods.
53. During servicing or repairs of equipment or vehicles, an effective drip tray shall be used to prevent spills of oil and grease on to the soil. This is also obligatory for emergency repairs.
54. Leaking equipment shall be repaired immediately or shall be removed from the site for repair.
55. Liquid waste generated on site, such as lubricants, paints, cleaning chemicals and other aqueous oil-based materials, shall be collected separately, stored in a covered area in a suitable storage tank (i.e. on a impervious liner with appropriate secondary containment), and disposed of at a government-approved facility.
56. Cement shall be covered with tarpaulin sheets during non-working periods.
57. Concrete mixing shall not take place directly on the ground.
58. In case of spillage of mixed concrete, the area shall be cleaned immediately. The waste shall be collected and disposed of at sites approved by MCA-Nepal.
59. Unused cement bags shall be stored in a weather-proof area where they will not be affected by rain. Used (empty) cement bags shall be collected and stored in weatherproof containers to prevent windblown cement dust and water contamination. The bags shall not be used for any other purpose.
60. All excess concrete shall be removed from site on completion of concrete works. Washing of any excess concrete into the ground is not allowed.

#### Solid Waste Management

61. The Contractor shall establish a solid waste management system to ensure proper collection, segregation, and disposal of solid waste so that there is no contamination of soil or nearby waterbodies, or creation of public health issues.
62. The Contractor shall ensure that all facilities are maintained in a neat and tidy condition and the site shall be kept free of litter. Random disposal of solid waste from within or outside the project area shall be strictly prohibited.
63. At all places of work, the Contractor shall provide litter bins, containers, and refuse collection facilities for later disposal. Employees shall be educated on the segregation of waste with demarcated bins for recyclables, organic wastes and other materials placed in common areas.
64. Recyclable materials (e.g. wooden plates for trench works, steel, scaffolding material, site holding, packaging material, paper, empty cement bags, other containers, glass and wood), shall be collected and separated on site from other waste. Collected recyclable material shall be re-used or sold to a government-approved waste collector for recycling.
65. Debris generated from the dismantling of existing structures shall be suitably reused, to the extent feasible, in the proposed construction program (e.g. as fill materials for embankments).
66. Designated waste storage areas shall be covered to avoid direct contact with surface runoff and shall be fenced off to prevent wind-blown litter. Waste storage containers shall be covered, tip-proof, weatherproof, and scavenger proof.
67. The disposal of construction debris shall be carried out only at sites previously identified and approved by MCA-Nepal.



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68. Burning solid waste in open air conditions shall be strictly prohibited.
69. Trash and debris shall not be buried within fill or backfill areas.
70. Once construction is completed, all waste and construction-generated debris shall be removed from the site.

#### L.6.1 Procedure for Avoiding the Employment of Minors

The Labour Laws and Rules require that no minors – any person under the age of 18 years – are employed on site in capacity whatsoever.

The Contractor is responsible for ensuring that all labour recruited is aged 18 years or older. The Contractor has to enforce this requirement in contracts for labour force supply. This requires that the Contractor and labour force recruiter checks the identification of all personnel. If the person appears young, then the identification must be checked with community leaders to verify names and ages.

Any Contractor found employing minors will be reported by MCA-Nepal to the police for civil action.

#### L.6.2 Procedure for Recruiting Local Unskilled Labour

The employment of local labour is the single most effective way for a Contractor to maximise community relations, reduce delays and reduce grievances from local people. Employing local people as unskilled labour reduces the need for work camps and the potential for damage to communities is thereby reduced. Local people, particularly those affected by land loss and disruption to lives and livelihoods, welcome the opportunity for local work.

The form of construction of the tower sites and stringing is for small localised teams working in different areas, and this requires small gangs over a few weeks rather than extensive teams over long periods. By contrast, substation construction will require larger workforces for longer periods in static locations.

Each Contractor is required to have a Social Safeguards Manager with either Social Safeguards Officers or Community Liaison Officers in the field. These people will liaise with the MCA-Nepal ESP Community Assistants to identify those wanting to work in their local areas.

The Contractor's social safeguards staff and MCA-Nepal's ESP-CA will work together to identify those wanting to work. They will then prioritise the interested persons as follows:

1. Potential workers from Project Affected Households
2. Women workers
3. Workers from Adivasi Janajati and Dalit groups

The aim is for as many women and disadvantaged groups to be employed as possible, with a minimum of 25 percent women workers.

The Contractor's social safeguards staff and MCA-Nepal's ESP-CA must also identify local people with useful skills (i.e. semi- and skilled workers) who may be usefully employable on site. These would be drivers, welders, masons, cooks, etc. The lists of such personnel should be updated regularly and circulated to all nearby project Contractors and Subcontractors.

#### L.7.5 Procedure for Chance Finds for Cultural Heritage and Archaeological Resources

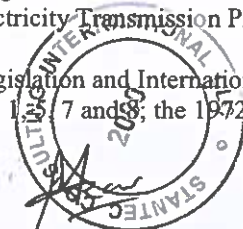
##### Introduction

The purpose of the Chance Finds Procedure is to provide clear and comprehensive project-specific response guidelines in the event that previously unconsidered cultural heritage or archaeological resources are encountered during the pre-construction and construction phases of the Nepal Electricity Transmission Project.

This procedure has been drafted taking into consideration applicable Nepalese Legislation and International Best Practice based on International Finance Corporation (IFC) Performance Standards 1, 7 and 8; the 1972



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UNESCO Convention on the Protection of World Cultural and Natural Heritage to which Nepal is a signatory; and ICOMOS Guideline on Heritage Impact Assessment.

The IFC Performance Standard 8 on Cultural Heritage (para 8) requires the development of a Chance Finds Procedure as part of this Environmental, Social, Health and Safety Management Plan if the project is in an area where cultural heritage may be expected to be found.

### *Scope and Objectives of the Procedure*

Cultural Heritage and Archaeological Resources include all tangible heritage as listed in Nepal's Ancient Monument Preservation Act, 2013 (1956 AD) and as defined under the IFC Performance Standard 8. These include:

- Monuments;
- Structures having archaeological, paleontological, historical, architectural, or religious significance;
- Works of art;
- Natural sites or natural features (including trees and plants) with cultural values;
- Graves and burial grounds; and
- Archaeological and paleontological finds (scattered or in their original context).

Accordingly, shrines, stupas, temples, other places of worship, trees, *chautaras*, stones and natural features associated with indigenous community spiritual beliefs are all included.

The Chance Finds Procedure (CFP) has been developed to include measures for impact avoidance and, where prevention is not practicable, mitigation of adverse impacts to be applied to all active sites during the construction and operation phases. The objectives of the CFP is to ensure that any work undertaken in relation to cultural heritage and archaeological resources identified during the construction and operation phases are undertaken in compliance with project policy, national legislation, international best practice and in consideration of the local cultural context and community and stakeholder preferences.

### *Applicability*

The Chance Finds Procedure is to be implemented in the event that previously unknown cultural heritage or archaeological resources are exposed or identified during construction of the transmission line, pylons and substations, or if new land-take results in additional cultural heritage resources becoming adversely impacted by the project.

Chance finds will include all tangible cultural heritage assets which have not previously been identified, claimed by the local communities/authorities or documented and treated during resettlement planning and RAP Implementation. Chance finds may be identified by any member of the project, affected communities or other stakeholders.

The Chance Finds Procedure does not apply to sites or resources which were identified, documented or claimed by PAPs or affected communities during resettlement planning – all such resources should be adequately and conclusively treated prior to commencement of the construction phase in order to minimise undue disturbance of the sites, minimise grievances raised as a result of inadequate treatment, and avoid delays to the construction schedule.

### *Management Options*

All project personnel in managerial or supervisory roles should undergo Chance Find Procedure Training and discussion of the procedure should be included in toolbox talks. All Contractor and Subcontractor personnel involved in excavation works should understand the Chance Finds Procedure and be made aware of their responsibilities in the event that they identify chance finds during their work. All project personnel should be aware of national legislation regarding the removal of archaeological and paleontological artefacts from the project area, and should be familiar with reporting responsibilities and lines of communication in the event that the Chance Finds Procedure is triggered during the construction phase. Dedicated training should be provided to key personnel and HSE tool box meetings should be used for dissemination of information to Contractor and Subcontractor personnel.



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Cultural heritage is best protected *in situ*, as this will result in the least damage to the site and minimise disturbance to local community usage of the site. However, it is acknowledged that there may be no technically practicable or financially feasible alternatives to removal of the affected site, especially if the project benefits outweigh anticipated cultural heritage losses.

### Outline of Chance Finds Procedure

The Chance Finds Procedure actions are as follows:

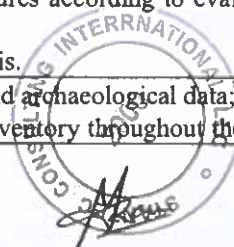
1. Stop construction activities immediately after chance finds are believed to have been exposed.
2. Demarcate and secure the site to prevent further damage or loss of finds.
3. Notify the Site Foreman / Supervising Engineer, ESHS personnel and MCA-Nepal. Written notification should be within 24 hours of the find.
4. Undertake consultations with the local communities.
5. Undertake rapid assessment and salvage isolated finds as per the detailed procedure.
6. Notify the relevant authorities, including but not limited to: the Department of Archaeology, the local Police Office and the Ministry of Health and Population (in the case of human remains).
7. Undertake investigative documentation of the site.
8. Assess the significance and importance of the findings.
9. Decide how to handle the finds and mitigate adverse project impacts, in consultation with relevant authorities and the affected community.
10. Undertake mitigation activities.
11. Communicate all decision making and outcomes to relevant stakeholders.
12. Resume construction work once authorisation is provided by the Department of Archaeology and MCA-Nepal.

### Roles and Responsibilities

Department of Archaeology (Ministry of Culture, Tourism and Civil Aviation)	<ul style="list-style-type: none"> <li>• Provide guidance with regard to Nepalese legislation;</li> <li>• Provision of experts in case of major or significant finds;</li> <li>• Participation in decision making processes;</li> <li>• Monitor and supervise Project activities;</li> <li>• Onward handling of chance finds of archaeological or paleontological nature.</li> </ul>
Palaeontologist	<ul style="list-style-type: none"> <li>• Provision of expertise in case of finds which are of paleontological nature.</li> </ul>
Police Department	<ul style="list-style-type: none"> <li>• Provision of security in case of significant finds;</li> <li>• Provision of services if human remains are potentially the result of a crime.</li> </ul>
Ministry of Health	<ul style="list-style-type: none"> <li>• Provide guidance with regard to Nepalese legislation;</li> <li>• Supervise exhumation, reinternment and transportation of human remains;</li> <li>• Provide guidance on permitting requirements for relocation of burials;</li> <li>• Provide guidance on HSE protocols when handling or transporting human remains.</li> </ul>
Engineer	<ul style="list-style-type: none"> <li>• Inform the local community about project activities;</li> <li>• Establish communication lines with relevant authorities.</li> <li>• Ensure that management procedures for Chance Finds align with local cultural practices and are agreed with the local communities and PAPs;</li> <li>• Provide communities and stakeholders the opportunity to participate in decision making processes and are fully informed about management procedures;</li> <li>• Ensure that all activities are undertaken with Free, Prior and Informed Consent (FPIC) as per Annex C.4.1 to 4;</li> <li>• Ensure that baseline cultural heritage data is provided to the construction contractor;</li> <li>• Ensure the construction Contractor's compliance;</li> <li>• Ensure that all personnel working on site are trained in Chance Finds Procedures;</li> <li>• Conduct routine inspections of site activities;</li> <li>• Ensure compliance to the Chance Finds Procedure by all project personnel;</li> <li>• Address grievances and community concerns as per the approved GRM;</li> <li>• Update and improve the Chance Finds Procedures according to evaluation results and in response to new information.</li> <li>• Reporting on monthly, quarterly and annual basis.</li> </ul>
Archaeologist (sub-contracted by the	<ul style="list-style-type: none"> <li>• Be familiar with all baseline cultural heritage and archaeological data;</li> <li>• Update the cultural heritage and archaeology inventory throughout the construction</li> </ul>



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Contractor as required)	<p>phase;</p> <ul style="list-style-type: none"> <li>• Be on standby for mobilisation in the event of the Chance Finds Procedure being triggered;</li> <li>• Undertake watching briefs for all areas of the project which have been identified as having a high likelihood of Chance Finds;</li> <li>• Undertake watching briefs for all locations where claims of burials have not yet been resolved;</li> <li>• Undertake archaeological investigations where cluster finds or significant finds have been exposed;</li> <li>• Liaise with the contractor, client, Department of Archaeology and other relevant parties to determine the best treatment of Chance Finds;</li> <li>• Oversee rescue and emergency excavations;</li> <li>• Compile all requisite documentation and ensure transparency in the process of find bagging, labelling, storage and onward possessing.</li> <li>• Communicate with the client regarding chance finds encountered;</li> <li>• Compliance monitoring of the Construction Contractor and subcontractors;</li> <li>• Undertaking monitoring and evaluation, communicating findings to the client and Contractor, flagging shortcomings in the existing Chance Finds Procedure and addressing gaps.</li> <li>• Reporting on monthly, quarterly and annual basis.</li> </ul>
MCA-Nepal ESP on-site Community Assistants	<ul style="list-style-type: none"> <li>• Communicate with PAP and local communities when chance finds are encountered;</li> <li>• Consult with PAP to identify the nature of chance finds and to document pre-existing knowledge (if any);</li> <li>• Identify PAP with claims to chance finds, particularly PAP or communities willing to assume responsibility for burials;</li> <li>• Facilitate and participate in verification and due diligence procedures;</li> <li>• Facilitate consultations with PAP regarding relocation procedures;</li> </ul>
Contractors and Subcontractors	<ul style="list-style-type: none"> <li>• Adhere to the Chance Finds Procedure;</li> <li>• Designate authorised personnel to deal with Chance Finds Procedures;</li> <li>• Monitor ground disturbances at all times as part of routine supervisory and compliance monitoring activities;</li> <li>• Stop work upon identification of chance finds;</li> <li>• Notify the relevant personnel upon identification of chance finds;</li> <li>• Ensure demarcation and safeguarding of the site where required;</li> <li>• Complete the Chance Finds Report and gather requisite documentation according to the Chance Finds Procedures.</li> <li>• Ensure adequate labelling, handling and storage of chance finds;</li> <li>• Ensure compliance and address non-conformities.</li> <li>• Register and report grievances and community concerns as per the approved GRM.</li> <li>• Reporting on monthly, quarterly and annual basis.</li> </ul>
Project Security Personnel	<ul style="list-style-type: none"> <li>• Ensure safeguarding of chance finds and implement limited access procedures to demarcated sites;</li> <li>• Ensure that artefacts are not removed from the site by unauthorised personnel;</li> <li>• Report all cases of non-compliance or unauthorised activities;</li> <li>• Ensure protection of Project personnel in the event of community discontent.</li> </ul>



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### Detailed Procedures by Type of Chance Find

The type of chance find encountered dictates the actions required to mitigate project impact. The categories of chance finds are outlined in the table below, followed by the specific detailed procedures for each typology:

Graves and Burial Grounds	Claimed Graves
	Previously unidentified Graves
	Potentially Speculative Graves
Archaeological or Palaeontological Finds	Isolated Finds
	Cluster Finds
Privately or Community-owned/ used heritage resources	Structures (temples, shrines, stupas), Natural sites or features, Trees and plants with cultural value.

#### Graves and Burial Grounds:

Graves coming under the jurisdiction of Chance Finds fall into three categories:

- Claimed graves not treated under RAP Implementation which require verification and relocation,
- Previously unidentified and unclaimed graves which require relocation, and
- Potentially speculative graves which will require relocation if found to be genuine.

#### Claimed Graves

These are graves that are visibly marked or are unmarked on the ground surface and which are claimed by Project Affected Persons (PAPs) or other community members. These are most likely to be encountered due to changes in land-take.

#### Actions to be taken

- The Cultural Heritage asset inventory should be updated prior to commencement of construction activities.
- Where claimed graves are identified, the same treatment as used during RAP Implementation should be adhered to. This should entail, at minimum:
  - Documentation of the site,
  - Consultations with the PAP and community on relocation preferences (nature of ceremony, expenses anticipated and proposed relocation site etc.),
  - Verification,
  - Due diligence (if required),
  - Compensation and/or financial assistance packages for the grave structure and relocation procedures (if eligible),
  - Relocation (exhumation and reinterment),
  - Monitoring and documentation of the individual site relocation and outcomes,
  - Monitoring and Evaluation of the processes.

#### Previously Unidentified Graves

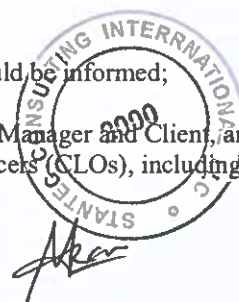
These are graves which are unmarked on the ground surface and which have not been previously claimed by PAPs or other community members and, therefore, have not been documented or treated during Resettlement Planning and RAP Implementation. These graves are most likely to be identified during ground breaking and excavation activities, when the first evidence of their existence will be the unanticipated exposure of human remains or burial artefacts.

#### Actions to be taken

- Work in the immediate vicinity should be stopped;
- Site Foreman, Project Manager, HSE Officers & Supervisors should be informed;
- The burial site should be demarcated and secured;
- Initial documentation of the site should be provided to the Project Manager and Client, and forwarded to the designated Project archaeologist and Community Liaison Officers (CLOs), including:



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- a. Photographic documentation of the excavation,
  - b. Photographic documentation of the exposed remains,
  - c. Brief description of the burial,
  - d. Depth of the burial,
  - e. Observed damage as a result of excavation activities.
5. The Project archaeologist should determine the nature of the burial and the likeliness of it being of archaeological significance<sup>2</sup>. If it is of archaeological significance, the burial site should be treated as a cluster find.
  6. The CLOs should liaise with PAPs and local communities to obtain more information about the burial (if any is available), and to ascertain whether relatives of the deceased or an interested community can be identified.
    - a. If relatives of the deceased who wish to take responsibility for the grave are identified, it should be treated as a claimed grave and relocated accordingly.
    - b. If relatives of the deceased cannot be identified but the Project-affected community wishes to assume responsibility, the Project should facilitate exhumation and reinternment according to local custom and in accordance with community wishes.
    - c. If no claimants are found, the Project should assume responsibility, and the grave relocated to a public burial ground or to land provided by the Project for reburial purposes.

In order to mitigate construction delays, work may be continued at a distance of at least 25 metres once the burial site has been demarcated and safeguarded. Further training of project personnel working in the vicinity may be required.

#### **Potentially Speculative Graves**

These are graves which were claimed during resettlement planning, but which were subsequently deemed as speculative due to lack of corroborating evidence gathered during Verification and Due Diligence procedures. In scenarios where PAP claims are persisting into the Construction Phase or where grievances against the Project have been lodged concerning inadequate treatment of claimed burials, the claimed sites should be treated as Watching Briefs during ground breaking and excavation activities.

#### **Actions to be taken**

1. A complete list of relevant sites should be compiled prior to commencement of the construction phase, and shared with the construction Contractor, MCA-Nepal, ESP-CA and any archaeologist engaged for work on the project.
2. Excavation activities in the vicinity of such sites should be undertaken under watching brief conditions. PAP with claims of graves in that area should be invited to witness the process, along with relevant community leaders.
3. Lack of physical evidence should be documented and PAP satisfaction with the processes undertaken should be verified.
4. Physical evidence, if found, should be subsequently treated as a 'claimed grave' and relocated accordingly.

#### **Archaeological and Palaeontological Finds – Isolated Finds**

Fewer than 5 items found in close proximity should be considered an 'isolated find'. Isolated artefacts such as bone fragments, archaeological items or fossils may be exposed during the process of excavation – identified either *in situ* at the sides or base of the excavation, or appearing in spoil heaps.

#### **Actions to be taken:**

1. Work in the immediate vicinity should be paused;
2. Site Foreman, ESHS staff and Supervisors should be informed;
3. The item(s) should be carefully retrieved by the Site Foreman or other personnel who have received requisite training;
4. Contextual information should be documented, including:

<sup>2</sup> The project should undertake consultations with the Department of Archaeology to determine the threshold age for a burial to be considered archaeologically significant. This may vary from 60 to 100 years depending on the cultural context, the nature of the burial and existence of artefacts with the remains, and whether there are relatives of the deceased with verified claims for the burial.



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- a. Position,
  - b. Depth of find,
  - c. Photographic documentation of the excavation hole and vertical sections,
  - d. Photographic documentation of item,
  - e. Observed damage as a result of excavation activities
5. The item(s) should be bagged and safely stored;
  6. Work on site can commence under watching brief conditions to ascertain whether more artefacts are uncovered.
  7. The MCA-Nepal should be informed, and all documentary information provided and forwarded to the designated Project archaeologist for further processing.

#### ***Archaeological and Palaeontological Finds – Cluster Finds***

Five items or more found in close proximity should be considered a 'cluster find'. They are most likely to be identified *in situ* at the sides or base of the excavation, but first indications may be as isolated finds appearing in spoil heaps.

Actions to be taken:

1. Work in the immediate vicinity should be stopped;
2. Site Foreman, Project Manager, HSE Officers & Supervisors should be informed;
3. The site of the finds should be demarcated, secured and safeguarded against further disturbances and opportunistic thefts (significant chance finds may require an immediate additional security presence);
4. Initial documentation of the site should be provided to the Project Manager and Client, and forwarded to the designated Project archaeologist, including:
  - a. Photographic documentation of the excavation hole,
  - b. Photographic documentation of the finds,
  - c. Brief description of the finds,
  - d. Depth of the finds.
  - e. Observed damage as a result of excavation activities
5. The Project archaeologist should undertake controlled test pit investigations to assess the extent and nature of the cluster, and liaise with the Project Manager, Client and Department of Archaeology to develop an appropriate response, which may include:
  - a. Rescue excavations if removal from site will not compromise contextual data;
  - b. Referral to appropriate authorities if identified as a recent human burial;
  - c. Referral to a palaeontologist if finds are identified as fossils, especially if they are fossils in a wider undisturbed palaeontological context;

In order to mitigate construction delays, work may be continued at a distance of at least 25 metres once the finds area has been demarcated and safeguarded. Further training of project personnel working in the vicinity may be required.

#### ***Privately or Community-owned or Used Heritage Resources***

Including structures (temples, shrines and stupas), natural sites or features, and trees and plants with cultural value, these are most likely to be identified prior to commencement of the Construction Phase if changes in land-take result in additional cultural resources being impacted by the Project. It is recommended that the same procedures used during Resettlement Planning and Implementation should be adhered to.

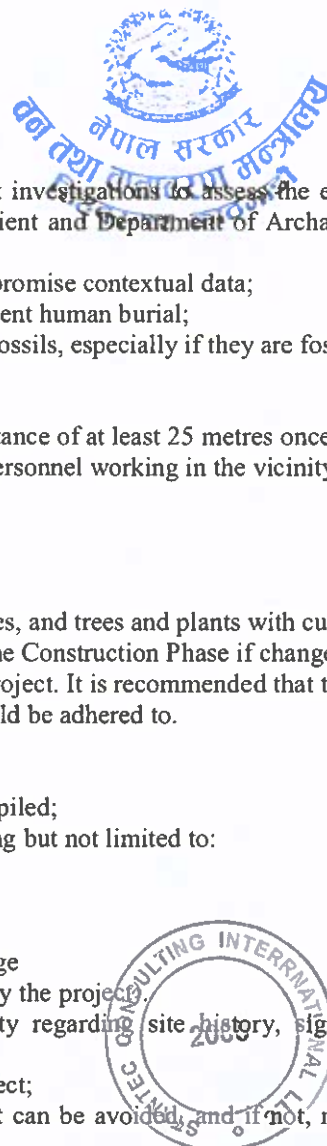
Actions to be taken:

1. Inventory of affected cultural heritage resources should be compiled;
2. Documentation of each resource should be undertaken, including but not limited to:
  - a. Photographic documentation
  - b. Field sketches
  - c. GPS coordinates and GIS mapping
  - d. Detailed documentation of site conditions and site usage
  - e. Degree of Impact (whether fully or partially affected by the project)
3. Comprehensive consultations with PAP and local community regarding site history, significance, uniqueness and usage;
4. Assessment of anticipated heritage losses as a result of the project;
5. Assessment of management controls – whether project impact can be avoided, and if not, mitigation



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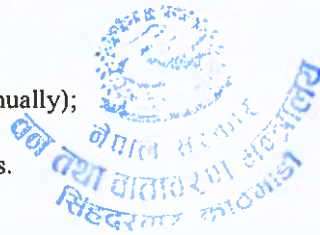


- measures;
6. Consultation with authorities and communities on preferred mitigation options, and identification of relocation sites;
  7. Assessment of relocation needs;
  8. Compensation and/or financial assistance packages for relocation procedures, and
  9. Compensation for loss of business (if eligible),
  10. Obtaining of permits and community consent to relocate;
  11. Relocation and replication of site;
  12. Monitoring and documentation of the individual site relocation and outcomes,
  13. Monitoring and Evaluation of the Chance Find Procedure.

### Reporting

Reporting mechanisms should be as follows:

- Individual Chance Find Report;
- Chance Find Log Book;
- Investigation and management reports;
- Progress Reports (monthly, quarterly, annually);
- Grievance logs; and
- Site Letters and Non-Compliance Reports.



### Monitoring Procedures

Monitoring procedures should include the following:

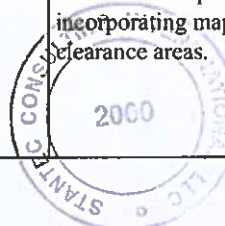
- Satisfactory implementation of the Chance Finds Procedure;
- Log of Chance Finds;
- Satisfactory mitigation of project impact;
- Log of grievances;
- Log of non-compliances; and
- Satisfactory resolution of grievances and non-compliances.

### L.8.4 Vegetation Clearance Procedure

S. No.	Required mitigation	Person responsible	Action to be implemented	Timing
<b>Pre-construction phase</b>				
1.	Pre-construction surveys shall be carried out prior to clearance to identify breeding, nesting and roosting sites with large congregations of birds or bats.	Engineer's Environmental Specialist	Pre-construction survey report	3 months prior to construction, at any given time of year
2.	The removal of vegetation shall be avoided, as far as possible, in steep terrain, erodible soils and landslide prone areas, especially in the Chure Hills.	Engineer's Geomorphologist	Site clearance plan delineating steep slopes and landslide-prone areas and incorporating any zoning restrictions from district authorities.	3 months prior to construction, at any given time of year.
<b>Construction phase</b>				
3.	No clearing of forests is to occur outside of the designated project area. Clearing vegetation outside of designated areas will be punishable under the relevant laws for clearing vegetation.	Contractors' Site Managers	Site clearance plan incorporating maps of clearance areas.	During construction.



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S. No.	Required mitigation	Person responsible	Action to be implemented	Timing
4.	Contractor shall provide training to staff and workers on all rules, regulations and information concerning restrictions related to unauthorised clearing of vegetation, as well as the punishment that can be expected if any staff or worker or other person associated with the project violates rules and regulations.	Contractors' Environmental Managers	Biodiversity induction and training.	Within one month of starting vegetation clearance.
5.	Vegetation shall be cut and removed by hand. Roots and stumps must not be disturbed. No chemical herbicides are to be used. Fire is prohibited. No access track construction is permitted. These measures are to prevent soil erosion.	Contractors' Site and Environmental Managers	Site clearance plan – details of methods.	Before clearance may begin.
6.	When clearing within 30 metres of streams and intermittent stream courses, no ground disturbance is permitted.	Contractors' Site and Environmental Managers	Site clearance plan – details of methods.	Before clearance may begin.
7.	The planned vegetation clearance area for the construction works shall be clearly identified and marked to avoid accidental clearing.	Contractors' Site, Environmental and Social Safeguards Managers	Site clearance plan – incorporating maps of clearance areas.	Before clearance may begin.
8.	In community forests, trees shall be cut and deposited in accordance with the agreement with the affected community forestry user groups.	Contractors' Site, Environmental and Social Safeguards Managers	As per government regulations and agreements with CFUG.	During clearance.

#### L.8.6a Biodiversity Community Engagement Procedure

The Engineer's Environmental Specialist, assisted by the Contractors' Environmental Managers, are to implement the Biodiversity Community Engagement Procedure with all local communities. Its purpose is to discuss issues such as wildlife protection from illegal hunting, uncontrolled forest production collection and illegal logging. This is to occur every six months.

The following measures shall be committed to, as a minimum:

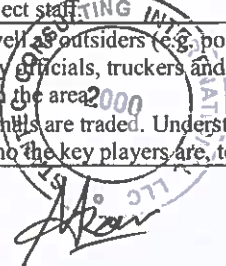
- Continue raising awareness of the conservation value of habitats and species within the project area and surrounds, including any biodiversity offset areas identified at a later stage;
- Encourage local people not to conduct illegal activities and discuss alternatives through proactive community engagement;
- Provide a forum for all communities, including those most vulnerable, to ask questions, express concerns and provide comment;
- Ensure that grievances are appropriately monitored; and
- Update the community on their legal obligations under Nepal Law.

Further details on the procedure to be applied are given in the table below.

Objective	Community access and engagement process
Government empowerment	<ul style="list-style-type: none"> <li>• If they are identified as local issues of concern, MCA-Nepal is to engage with the local government regarding logging and clearing activities within the project area and surrounds. An MOU is to be prepared with the local government regarding the responsibilities for reporting and enforcing action against illegal activities identified by project staff.</li> </ul>
Intelligence gathering	<ul style="list-style-type: none"> <li>• Engagement with the government and the community as well as outsiders (e.g. poachers, where possible), timber traders, law enforcement officers, forestry officials, truckers and other service providers), to gather information on any illegal activities in the area.</li> <li>• Visit the local markets where forest products and wild animals are traded. Understand how the illegal wildlife trade and logging value chain work, and who the key players are, to engage or</li> </ul>



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Objective	Community access and engagement process
	<p>target. The surveys are to be conducted discretely by local people so as to avoid suspicion. Based on the intelligence gathered, targeted campaigns shall be undertaken in conjunction with the government to reduce illegal logging and poaching.</p> <ul style="list-style-type: none"> <li>Map out the information identified above to establish who the key stakeholders are, how they access and use the areas, and how they interact with one another.</li> </ul>
Raising community awareness of biodiversity values and managing illegal activities	<ul style="list-style-type: none"> <li>Raise awareness of the conservation value of the forests and the surrounding areas through campaigns and workshops, highlighting threatened flora and fauna species. Workshops are to occur on a regular basis (at least every six months).</li> <li>All workshops are to be conducted with representatives of all community members (elders, women, men, youth, hunters, fishers etc.).</li> <li>All villages within the project area are to be subject to community workshops at least once every year.</li> <li>Educate local people not to conduct illegal logging and poaching activities, and discuss the regulatory requirements under Nepalese Law.</li> <li>Conduct education sessions in schools at least once per year on biodiversity.</li> </ul>
Community empowerment	<ul style="list-style-type: none"> <li>Identify people from each community to become volunteers (i.e. people who genuinely want to protect biodiversity), who will pass the conservation messages around the communities.</li> </ul>
Fostering community inclusiveness	<ul style="list-style-type: none"> <li>Provide a forum for communities to ask questions, express their concerns and provide comments.</li> <li>Update local communities on developments within the project that might be relevant to them: e.g. Contractors are to provide felled trees from the project ROW to FUG.</li> </ul>

### L.8.6b Wildlife Shepherding Procedure

This procedure is to be used in the event that an area of forest to be cleared is found to have a significant number of wild animals that need to be moved into neighbouring areas of forest.

All personnel involved will be briefed on the details of this plan and their respective roles before any field activities begin. Personnel will also be equipped with mobile communication devices in the field to ensure that lines of communication are maintained during field activities and that the appropriate persons (e.g. veterinarians, wildlife handlers, etc.) are able to respond to exigencies in a timely manner.

The minimum requirements for Wildlife Shepherding Protocol are detailed in the table below.

Step	Activity description
<b>General approach to wildlife shepherding (scheduled during daylight hours only - i.e. 8 am to 6 pm)</b>	
1	Installation of barriers (if required), which will function as a drift fence to guide target terrestrial fauna in the intended direction of movement and as a barrier to prevent wildlife displacement onto adjacent roads.
2	Develop a systematic pattern of walking through the site, starting from the furthest point and then gradually moving towards the identified refuge area, in order to shepherd wildlife in an intended direction of movement towards adjacent refuge habitats.
3	In conjunction with (2), the site will be carefully surveyed to check for the presence of target fauna species and any active dens.
4	Site inspection by an ecologist to ensure that no target fauna and active dens remain.
5	Closing of gaps in the barriers (if required) as soon as practicable to prevent target terrestrial fauna from returning to the site.
Note	Steps (2) and (3) to be carried out repeatedly over a course of up to three weeks for a site no larger than twenty hectares.
<b>General approach for target fauna encounters.</b>	
<b>Highly mobile fauna for which a passive shepherding approach is expected to be effective:</b>	
6a	Personnel to remain in place to allow fauna to move on their own accord. Generation of mild human noise disturbance (e.g. talking loudly) may be used to encourage fauna movement. However, no attempt shall be made to capture or handle these species, unless the animal is visibly injured in which case experienced wildlife handlers will carefully capture the animal for immediate veterinary attention. If any individual fauna does not move on its own after sufficient time (i.e. up to one hour) has passed, the area where the individual is located shall be GPS-marked and left overnight to provide additional opportunity for the individual to move on its own accord. Personnel shall return to the GPS-marked location on the following day to inspect the area. This process will be repeated until the individual has moved.
Fauna for which a passive shepherding approach is expected to be unsafe and/or ineffective in guiding the individual fauna to move in an intended direction:	



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Step	Activity description
6b	A capture-and-release approach will be needed to ensure safe relocation of these fauna from the site prior to construction. Experienced wildlife handlers will carefully capture the animal for subsequent assessment and microchipping (where safe and possible) by a veterinarian. Where sensitive fauna and venomous snakes are concerned, their capture shall only be carried out by designated wildlife handlers who have been trained in the appropriate handling techniques.
<b>Arboreal and aerial species.</b>	
Able to continue utilising remnant habitats on the site during construction, and will not be excluded by the installed hoarding:	
7	An ecologist shall inspect the tree for the presence of fauna, inhabited tree hollows, and nests.
8	In the event that the presence of arboreal mammals and herpetofauna, birds and/or bats are detected on the tree, tree felling or transplanting must be postponed until the animal has left the tree on its own accord.
9	In the event that an inhabited tree hollow is identified, tree felling or transplanting must be postponed until the animal has left the hollow on its own accord and the entrance to the hollow has been sealed to prevent re-entry.
10	Tree felling or transplanting shall not occur during the prime breeding season for local avifauna. In any case, if active nests are detected on the tree, nests shall be left undisturbed until nesting activities have been completed (i.e. the young have left the nest). In addition, inactive nests shall be removed to minimize the possibility of a new nesting attempt. Tree felling or transplanting shall occur only when no active nests are present on the tree.
11	Notwithstanding the aforementioned steps, after tree felling has occurred, an ecologist shall thoroughly search the fallen tree for any injured or trapped fauna that may have gone undetected. In the event that injured or trapped fauna are found, immediate veterinary attention shall be administered.

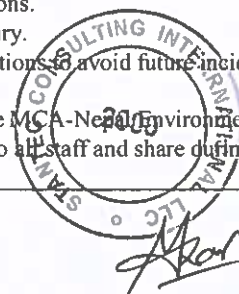
### L.8.6c Injured Wildlife Procedure

The injured wildlife management protocol is to apply in cases where injured wildlife is found within the project area. The necessary actions are listed in the table below.

Event	Action
Upon discovery of an injured animal	<ul style="list-style-type: none"> <li>Record the date, time, location, condition of the animal and circumstances concerning the incident, including photographic evidence wherever possible.</li> <li>If personnel are not in immediate danger, wait for the animal to move off before continuing work.</li> <li>If the animal is in immediate danger or clear distress, assess feasibility of capture depending on the species, size, location and safety of capture to both animal and personnel.</li> <li>Alert DFO staff on the incident and arrange a same-day appointment for the transfer of the animal to them.</li> </ul>
Preparation for containment	<ul style="list-style-type: none"> <li>All staff involved in the containment exercise shall be equipped with a pair of gloves and towel or gunny sack that is appropriately sized to cover the animal.</li> <li>A vehicle shall be immediately ready to transport the animal back to the site without delay.</li> </ul>
Management of small to medium sized injured animals	<ul style="list-style-type: none"> <li>An adequately sized covered box or cage shall be prepared to contain the animal immediately. The bottom of the box or cage shall have towels or rags placed at the bottom to protect the feet of the animals. Use separate boxes for individuals, never place two animals in the same container.</li> <li>Approach the animal from behind, slowly and carefully, pausing when needed to let the animal calm down and habituate to human presence.</li> <li>When picking the animal up, use a towel to gently wrap around its back (and wings, if a bird or bat) and cover the head. Maintain a low level of noise to avoid further stress to the animal.</li> </ul>
Treatment of small to medium sized injured animals	<ul style="list-style-type: none"> <li>Pass the animal to the DFO staff.</li> <li>If the animal must be kept overnight, place it in a ventilated box with a secure lid. Keep it in a quiet, dark area and do not attempt to feed, handle or release it. Transfer the animal to the forest department staff the following day.</li> <li>Discard all boxes used for transporting injured wildlife to avoid the transfer of disease. For cages, clean out thoroughly before re-use.</li> <li>All staff involved in the capture of the animal must wash and sterilise their hands immediately upon return from site.</li> <li>All clothes worn during the capture shall be washed the same day.</li> </ul>
Post-incident	<ul style="list-style-type: none"> <li>Follow up with the DFO or veterinarian on condition of animal and date of release.</li> <li>Contractor's Environmental Manager to investigate further circumstances of the incident.</li> <li>Interview workers on site that day and record their observations.</li> <li>Identify potential activities that could have led to animal injury.</li> <li>If injury attributed to project activities, identify corrective actions to avoid future incidents with Process Senior Executive.</li> <li>Record actions in a short factual report, for submission to the MCA-Nepal Environmental Specialist.</li> <li>Contractor's Site Manager to disseminate actions via email to all staff and share during daily toolbox meetings.</li> </ul>



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### L.9.1 Spill Response Procedure

Every Contractor must create and implement a comprehensive Spill Prevention and Response Plan. This will clearly outline the following control procedures.

- Provision of appropriate containment for any fuel, lubricants, paints or other hazardous materials, including secondary containment (i.e. bunding) around any storage tanks.
- Prohibition of any construction equipment and vehicles from being parked or refuelled, and hazardous material storage, within 50 metres of any streams.
- Provision of manufacturer-recommended maintenance requirements for all equipment and vehicles.
- Detailing of the maintenance and monitoring requirements for storage tanks and vehicles to check for leaks on a regular basis.
- Requirement to minimise the use of hazardous material as far as possible in the construction works, or substitute hazardous materials with non-hazardous or less hazardous options.
- Detailing of good housekeeping procedures to store hazardous materials in accordance with their hazard category and establish an inventory of them, with detailed records of daily or weekly use, sites of use and any hazardous material which remains in storage.
- Outline training requirements for vehicle drivers and equipment operators on effective chemical handling and storage to minimise the risk of spill or leak events.

In the event that an accidental leak or spill of fuel, lubricants, paints, chemicals or chemical waste takes place, the following process must be undertaken.

- The person who identifies the leak or spill shall immediately check if anyone is injured and stop all work on the site.
- They must then inform the Contractor's Site Manager and Environmental Manager.
- The Site Manager shall ensure that any injured persons are treated.
- The Site Manager and Environmental Manager must assess the nature of the substance that has spilt or leaked.
- If the incident poses a potential risk of serious environmental pollution (e.g. leakages into nearby water bodies which are used for drinking water or irrigation), the Environmental Manager shall immediately notify MCA-Nepal.
- In such cases, the Contractor shall take immediate action to stop the spill or leak and divert it to a nearby non-sensitive area.
- The Contractor shall arrange for maintenance staff, with appropriate protective clothing, to clean up the spill. This should be done using the Contractor's spill kit, which must be provided at each site where hazardous substances are present. If this is not enough, then it may be achieved through covering the area with sawdust or rice husks, or containing it with sandbags (if the quantity is large); and using a shovel to remove the topsoil.
- The ESHS staff shall ensure that the processes for reporting spills and cleaning up the damage are properly followed. The Contractor shall prepare a report describing the root cause analysis for the spill or incident and the remedial action that was taken, the consequences and damage caused, and the proposed corrective actions. The incident report shall be submitted via the Engineer to MCA-Nepal for review and shall be maintained in the records.
- Spills must not be flushed to local surface drainage systems or streams. Instead, government approved clean-up and disposal procedures shall be carried out.
- All site management and ESHS personnel shall receive training arranged by every Contractor on emergency spill procedures, so that they are fully aware of the various potential emergency situations associated with construction activities and the corresponding response procedures to be applied.



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