

Introduction

Infrata Limited (“Infrata”) has been engaged as the Lenders’ Independent Environmental and Social Consultant (“IESC”) for the New Tashkent International Airport Project (the “Project”) and has undertaken an Environmental and Social Due Diligence (“ESDD”) review of the Project.

This Environmental and Social Action Plan (“ESAP”) has been developed based on the findings of the Environmental and Social Due Diligence (“ESDD”) and has been further refined through ongoing reviews, discussions and negotiations between the Sponsors and the Lenders. The ESAP reflects the actions agreed to support the Project’s alignment with the Applicable Standards identified during the due diligence process.

This document is an advanced draft of the Sponsors’ ESAP prepared for disclosure purposes. The ESAP is not yet final and remains subject to further revisions through the Common Terms Agreement (“CTA”) process and ongoing discussions between the Sponsors and the Lenders.

The ESAP is presented in the table below and identifies the measures required to achieve and maintain compliance with the Applicable Standards. Each action includes a completion timeframe and completion indicator used to verify closure of the action.

New Tashkent International Airport - ESAP Sponsors

ESAP #	Topic	Requirement	Target and Evaluation Criteria for Successful Implementation	Timeframe
1	E&S Interface Management with Public Partner	Develop Interface Management Plan (required under Schedule 35 of the PPPA) and include environmental and social (E&S) matters relevant to Public Partner Works, Associated Facilities and airport-wide activities, including information sharing, monitoring, incident notification, corrective action tracking and reporting.	E&S content of Interface Management Plan, approved by Public Partner and acceptable to Lenders, for construction. E&S content of Interface Management Plan, approved by Public Partner and acceptable to Lenders, for operation.	Construction: Prior to the first disbursement or commencement of construction activities, whichever occurs first. Operation: Six months prior to start of commercial operations.
2	Environmental and Social Assessment - Identification of Risk, Impacts and Mitigation	In coordination with the Public Partner, undertake an assessment of the E&S impacts associated with the termination of existing commercial activities of the existing airport. (The decision regarding the closure of the existing airport is expected to be made by the President of Uzbekistan.)	Addendum to the ESIA addressing, including any associated E&S risks and impacts associated with the termination of existing commercial activities at the airport.	Six months prior to closure of all commercial operations at the existing airport.
3	Establishment of Sanitary Protection Zone and Public Safety Zone	Provide the noise and air quality modelling results, together with any other environmental and social information required under the SPZ implementation framework, to the Public Partner to support the SPZ Authority in updating its Conclusion, where necessary, and to facilitate a positive Stage 2 EIA (ZVOS) decision. If required, support in submitting SPZ application, with all required supporting materials, to the regulator so as to facilitate the establishment and enforcement of the SPZ.. Support the Public Partner in the establishment of a Public Safety Zone (PSZ) for the airport and support the competent authorities in the development and implementation of the	Delivery of required noise, AQ and any other modelling required to satisfy the requirements of the implementation framework	Six months prior to start of commercial operations at the new Airport.

ESAP #	Topic	Requirement	Target and Evaluation Criteria for Successful Implementation	Timeframe
		necessary regulatory and technical arrangements.		
4	Environmental and Social Assessment - Associated Facilities	Once sufficient information on the Associated Facilities becomes available, undertake an assessment of the environmental and social risks and impacts of the AFs. The assessment shall also document the ownership and implementation responsibilities of the mitigation and compensation measures for each AF.	Addendum to ESIA on Associated Facilities.	Six months after design for Associated Facilities has been completed or prior to land acquisition impacts taking place for the Associated Facilities, whichever occurs first.
5	Environmental and Social Assessment – Fill Material Sources	Select the sources and suppliers of fill material required for construction of the airport taking into account environmental and social criteria and avoid, where practicable, sources associated with elevated environmental (including biodiversity) or social risks. Once the sources of fill material have been identified, undertake an E&S assessment of the required transportation activities. The assessment shall consider, as applicable, air quality emissions from haulage activities, traffic and road safety impacts, noise, and community health and safety risks. Update the Traffic Management Plan and implement appropriate mitigation, monitoring and haulage route management measures, as required.	E&S report documenting the Private Partner's screening process and the proposed selection with estimated volumes to be transported from each quarry to the construction site and traffic routes. E&S Assessment of Material Transportation Activities and updated Traffic Management Plan acceptable to the Lenders	Prior to the first disbursement or start of construction, whichever occurs first
6	Environmental and Social Assessment - Cumulative assessment	Prepare standalone Cumulative Impact Assessment addendum incorporating, relevant known developments, where available: - the findings of the Associated Facility E&S Assessments and the E&S assessment of fill material sourcing and transportation activities;	Standalone Cumulative Impact Assessment submitted with Public Partner and acceptable to the Lenders.	Six months after design for Associated Facilities has been completed or prior to land acquisition impacts taking place for the Associated Facilities, whichever occurs first.

ESAP #	Topic	Requirement	Target and Evaluation Criteria for Successful Implementation	Timeframe
		- any foreseeable development (including the ones unrelated to the airport) that may lead to additional cumulative impacts. The assessment shall identify any additional cumulative environmental and social impacts and define any necessary mitigation and monitoring measures, to be included in the ESMPs, including responsibility for implementation.		
7	Environmental and Social Management System	Develop and implement a Project Environmental and Social Management System (ESMS). The ESMS shall establish the Project's E&S and Human Resources policies and define the governance structure, roles and responsibilities, risk management processes, stakeholder engagement and grievance management arrangements, labour and working conditions requirements, contractor and supply chain management requirements, interface management arrangements, incident management procedures, monitoring and reporting requirements, training requirements, and the management arrangements to be applied throughout the construction and operational phases. Labour and working conditions requirements shall include, at a minimum, non-discrimination, equal rights and equal pay; prevention of child labour and forced labour; workers' rights and obligations; freedom of association and collective bargaining; procedures to inform workers of their rights, obligations, liabilities and entitlements; terms and conditions of employment, including recruitment, working hours, overtime arrangements and compensation, and the right to refuse overtime; contractor management requirements; workers' accommodation arrangements consistent with the IFC and EBRD Workers' Accommodation	Project ESMS Manual submitted and approved by Lenders and then implemented. Organogram with all E&S roles approved by Lenders.	Prior to first disbursement or start of construction, whichever occurs first

ESAP #	Topic	Requirement	Target and Evaluation Criteria for Successful Implementation	Timeframe
		Guidelines (2009); occupational health and safety requirements; a commitment to zero tolerance for gender-based violence, workplace harassment, sexual exploitation and abuse; and a formal worker grievance mechanism available to all Project workers.		

ESAP #	Topic	Requirement	Target and Evaluation Criteria for Successful Implementation	Timeframe
8	Environmental and Social Management Plans/ Programs - Construction	Develop and implement Construction Environmental and Social Management Plans (CESMPs) that shall include: - Occupational Health and Safety Plan - Community Health and Safety Management Plan, including community grievance mechanism - Construction Noise Management Plan - Labour Management Plan, including workers grievance mechanism - Human Resources Policy - Air Quality Management Plan - Gender-Based Violence and Harassment (GBVH) Management Plan - Workers Accommodation Plan - Emergency Preparedness and Response Plan - Waste Management Plan - Hazardous Material Handling and Storage Procedure - Water and Wastewater Management and Implementation plan - Earthworks Management Plan - Traffic and Transportation Management Plan - Biodiversity Management and Monitoring Plan (including Biodiversity Chance Find Procedure) - Noise Management Plan - Cultural Heritage Management Plan including Chance Find Procedure - Landscape and Lighting Management Plan - Security Management Plan - Influx Management Plan - Supply Chain Management Plan (E&S Requirements) - E&S Training Plan - E&S Monitoring Plan - Demobilisation Plan, including measures to manage workforce demobilisation and associated labour impacts	Final versions of management plans acceptable to Lenders and Owners' engineer and then implemented.	Prior to first disbursement or start of construction, whichever occurs first For authorized Limited Notice to Proceed (LNTP) / early works, only those E&S management plans and procedures relevant to the scope and associated risks of the authorized activities shall be developed as a single plan and submitted to the Lenders for review and approval prior to commencement of such activities.

ESAP #	Topic	Requirement	Target and Evaluation Criteria for Successful Implementation	Timeframe
9	Environmental and Social Management Plans/ Programs - Operation	In coordination with the Public Partner and considering the E&S Interface Management Plan for operation, develop and implement Operational Environmental and Social Management Plans (ESMPs), that shall include the following plans and procedures. - Overarching Operational Environmental and Social Management Plan - Labour Management Plan, including Workers Grievance Mechanism - Noise Management Plan (see #20 below) - Carbon and Energy Management Plan - Air Quality Management Plan - Waste Management Plan - Water and Wastewater Management and Implementation Plan - Occupational Health and Safety Plan - Community Health and Safety Management Plan, including Community Grievance Mechanism - Emergency Preparedness and Response Plan - GBVH Management Plan - Security Management Plan - Traffic Management Plan - Biodiversity Management and Monitoring Plan - Supply Chain Management Plan - E&S Training Plan - E&S Monitoring Plan Implement and maintain the Operational ESMPs throughout the operational phase, including oversight of contractors, subcontractors and tenants.	Final versions of management plans acceptable to Lenders and then implemented.	Six months prior to commencement of commercial operations (except Noise Management Plan).

ESAP #	Topic	Requirement	Target and Evaluation Criteria for Successful Implementation	Timeframe
10	Organisational Capacity (Construction)	Recruit a qualified E&S team for the construction phase of the project. The roles shall include: (i) an E&S Manager whose responsibilities will include the coordination of E&S requirements and mitigation measures among relevant project stakeholders; (ii) an Occupational Safety Manager; (iii) a Social Manager; and (iv) a Community Liaison officer.	Curriculum Vitae and job description of proposed team members submitted for Lenders no objection. Organigram and reporting lines submitted to Lenders.	Prior to second disbursement or start of construction, whichever occurs first
11	Organisational Capacity (Operations)	Recruit a qualified E&S team for the operations phase of the project. The team shall include: (i) an E&S Manager; (ii) an Occupational Safety Manager; and (iii) a Community Liaison officer.	Curriculum Vitae and job description of proposed team members submitted for Lenders no objection Organigram and reporting lines submitted to Lenders.	Three months prior to commencement of commercial operations.
12	Contractor Management - Construction	Ensure that the Landside construction contracts include obligations to comply with the Applicable Standards and implement the CESMPs, and to provide the resources, personnel, training and reporting necessary for their effective implementation.	Executed EPC contractual provisions incorporating CESMPs.	Prior to commencement of construction activities.
13	Labour audit (Construction)	Undertake external labour audits to be conducted by competent labour auditor biannually during the construction period to ensure compliance with Lenders' requirements and safe working conditions by the Sponsors and its contractors/sub-contractors. Any material non-compliances with ESR2 / PR2 to be rectified as part of post-audit corrective action plan and evidence presented to Lenders.	ToR and CV of labour auditor for labour audit to be submitted to Lenders for No Objection. Labour audit report submitted to Lenders, along with corrective action plan, as required.	First audit to be undertaken three months after start of construction and thereafter every six months throughout the construction.

ESAP #	Topic	Requirement	Target and Evaluation Criteria for Successful Implementation	Timeframe
14	Contractor Management - Operation	Ensure that the Landside O&M contracts include obligations to comply with the Applicable Standards, implement the Operational ESMPs and provide the resources, personnel, training, monitoring and reporting necessary for their effective implementation.	Signed O&M Contract	Six months prior to start of commercial operations
15	Supply Chain	Perform a formal risk assessment or request supplier self-disclosure, for renewables sector relevant to the Project (i.e. solar and BESS) to identify and address potential human rights risks within the primary/core supply chain, in line with PS2/ESR2 requirements. If supply chain risk identified, then Client to adopt mitigation measures that may include the cascading the legal rider across the contracting chain for solar PVs and BESS.	Supply chain risk assessment records and supplier self-disclosure questionnaires completed for specified sectors.	Prior to finalization of specified sectors supply contracts.
16	Air emissions and GHG	Update the air quality modelling and GHG inventory with airport-related surface traffic once sufficient traffic forecasting information becomes available, and incorporate the findings into a Carbon and Energy Management Plan to quantify and monitor energy consumption and GHG emissions, identify and implement energy efficiency and emissions reduction measures across landside and airside operations, and define responsibilities for implementation of airport-wide energy efficiency and decarbonisation initiatives.	Updated air quality modelling report incorporating airport-related traffic emissions, Updated GHG inventory and Carbon and Energy Management Plan.	Six months prior to start of commercial operations.
17	GHGs	Execute the Carbon and Energy Management Plan (CEMP) including any recommendations applicable to future airport development phases, and provide regular updates on the implementation of the identified measures.	Annual CEMP updates	Annual reporting until December 2035 (assumed to be 5 years of operation).

ESAP #	Topic	Requirement	Target and Evaluation Criteria for Successful Implementation	Timeframe
18	Resource Efficiency - EU Substantive Requirements and BAT	Undertake a review of the Project against applicable EU substantive environmental requirements and relevant EU Best Available Techniques (BAT) principles, including energy efficiency, heating and cooling systems, building envelope performance, utilities infrastructure, waste management facilities, wastewater treatment systems and other relevant environmental aspects. Incorporate any resulting design modifications, mitigation measures and performance requirements into the final design, technical specifications, management plans and operational arrangements, as applicable.	EU Substantive Requirements and BAT Review Report. Gap assessment identifying any deviations and proposed corrective measures. Evidence that identified measures have been incorporated into the detailed design.	Prior to finalization of detailed design.
19	Water Supply (Operation)	Develop and document the process, assessment criteria and decision-making framework that will be used to determine and confirm the Airport's long-term water supply strategy. The framework shall define the studies, investigations, stakeholder consultations and technical criteria required to evaluate the suitability, capacity and sustainability of alternative water supply options, including groundwater abstraction and any future regional bulk water supply infrastructure.	Water Supply Strategy Assessment Framework acceptable to the Lenders. Documented assessment of alternative water supply options and justification for selection of the preferred long-term water supply solution.	Six months prior to commercial operations
20	Wastewater (Construction and Operation)	Finalise the wastewater treatment and discharge/reuse strategy, for both construction and operation phases, including confirmation of the receiving environment, discharge regime, applicable discharge / reuse standards. Based on these parameters, finalise the design of the WWTP(s) and demonstrate alignment with applicable national requirements and Applicable Standards. Reflect findings in Water and	Wastewater discharge/reuse strategy. Design documents. Evidence of compliance with applicable discharge standards and GIIP/lender requirement.	Construction: Prior to first disbursement or start of construction, whichever occurs first. Operations: Six months prior to commercial operations

ESAP #	Topic	Requirement	Target and Evaluation Criteria for Successful Implementation	Timeframe
		Wastewater Management and Implementation Plan.		
21	Noise	Update noise model based on airspace design and up to date information on airport operations. Based on the revised model, develop a Noise Management Plan for operation of the airport (airside and landside) consistent with the commitments, governance arrangements and responsibilities defined in the Noise Management Framework, and consistent with the ICAO Balanced Approach to Noise Management and the objectives for noise management as set out in the NMF. The Plan shall consider noise management measures through updated noise modelling in accordance with Good International Practice and ICAO Guidance, through a process of benchmarking noise abatement measures at airports of a similar size including in the EU. This shall be carried out against a stated noise abatement objective and defined using an evaluation method for the assessment of cost-effectiveness that meets the requirements of ICAO guidance. These should include: (i) updated noise exposure contours and identification of affected receptors; (ii) operational noise mitigation and adaptive management measures; (iii) noise monitoring locations, methodologies, trigger levels and reporting requirements; (iv) procedures for recording, investigating and responding to community noise complaints; (v) assessment of communities and households potentially disproportionately affected	Operational Noise Management Plan approved by Public Partner and acceptable to the Lenders.	Six months prior to start of commercial operations

ESAP #	Topic	Requirement	Target and Evaluation Criteria for Successful Implementation	Timeframe
		by aircraft noise through overlay of updated noise contours with settlements and sensitive receptors, including identification of households containing noise-vulnerable individuals and establishment of prioritisation criteria; (vi) community and residential noise mitigation, monitoring and adaptive management measures, including consideration of alternative response thresholds and mitigation measures for priority and vulnerable households, where appropriate. The Noise Management Plan shall clearly allocate responsibilities for implementation of each of the management measures that are identified and define the organisational capacity required for implementation, including arrangements for coordination between the responsible noise management personnel and the Community Liaison Officer.		
22	Noise	Execution of the landside elements of the Noise Management Plan, and provide regular updates on mitigation measures, including on the measures that will be directly managed by the Public Partner.	Updates on NMP execution	Semi-annual reporting of NMP for the first 2 years of operation and annual reporting of NMP until the end of the fifth year of operation.
23	Hazardous Material Management - Operation	Undertake Quantitative Risk Assessment for the Airport fuel farm, including fire, explosion and fuel release scenarios, potential impacts on surrounding communities, emergency response requirements and risk mitigation measures. The assessment shall confirm that the fuel farm design incorporates appropriate measures for the prevention and control of fire and explosion hazards, including hazardous area classification and explosive atmosphere requirements, where applicable. Incorporate the findings into fuel farm design. Incorporate the findings into the Emergency Preparedness and Response Plan (EPRP),	Quantitative Risk Assessment. Design documents containing QRA findings Emergency Preparedness and Response Plan and procedures as part of OESMPs.	QRA during design development Final design contains QRA requirements EPRP - Six months prior to start of commercial operations

ESAP #	Topic	Requirement	Target and Evaluation Criteria for Successful Implementation	Timeframe
		Operational ESMPs and fuel farm operating procedures.		
24	Life and Fire Safety - Operation	Commission a third-party L&FS audit to be performed by a suitably qualified independent L&FS professional to confirm that the design of the Project complies with the L&FS requirements of the IFC General EHS Guidelines. The audit shall adopt a coordinated approach covering both the Private Partner and Public Partner components of the Project, as applicable. A further third-party L&FS audit shall be performed at the time of L&FS systems testing and commissioning to certify that installation of these systems has been carried out in accordance with the compliant design.	L&FS audit report for design of the Project Corrective Action Plan (if any non-conformity is identified) L&FS audit report confirming that installation of the system has been performed in line with the compliant design	Once sufficient design details are available to carry out meaningful assessment of compliance. Prior to commissioning of the Airport.
25	Resettlement	Prepare, disclose, and implement RAPs, where required, to address displacement impacts associated with Associated Facilities, enforcement of Sanitary Protection Zone, Aviation Safety Zone (restrictions to plant certain crop types) by the relevant authorities, with the Client providing necessary support as appropriate, public health impacts (including noise and air emissions) and other Project design changes that may result in temporary or permanent physical or economic displacement. RAPs shall be prepared and approved in accordance with the Project RPF and shall include clear allocation of responsibilities for compensation.	Terms of Reference for the RAP acceptable to the Lenders. Implementation-ready RAP to be submitted to Lenders for approval prior to the start of the implementation.	Once the information about SPZ, ASZ and other zoning requirements becomes available and the resettlement impacts can be assessed but prior to the start of the resettlement process.

ESAP #	Topic	Requirement	Target and Evaluation Criteria for Successful Implementation	Timeframe
26	Resettlement	Carry out internal quarterly monitoring of RAP implementation (including documenting the compensation negotiation and payment process, time allowed to PAPs to choose between in-kind and monetary compensation). Prepare quarterly reports. Prepare Compensation Payment Reports immediately following the delivery of compensation and entitlements to PAPs and submit to lenders. Internal RAP Completion Report shall be prepared and submitted to confirm that all compensation and livelihood support measures have been extended as per approved RAP and PS5 / ESR5 requirements. RAP completion reports to be approved by Lenders prior to the taking possession of the land plot/assert and / or displacing the PAPs.	Quarterly reports submitted to the lenders. Compensation Payment Reports acceptable to the lenders. RAP Completion Reports submitted for Lenders' approval before displacement impacts take place.	Throughout RAP implementation.
27	Resettlement	Commission a qualified independent external resettlement consultant to conduct a Resettlement Completion Audit.	Terms of Reference for the Completion Audit acceptable to the Lenders. Completion Audit Report acceptable to the Lenders.	Upon completion of the livelihood restoration measures, in accordance with the schedule outlined in the RAP.
28	Cultural Heritage	Include in the Cultural Heritage Management Plan (that is to be developed and implemented as part of the construction ESMPs) a section describing the process for grave relocation, with reference to the grave relocation roadmap/plan prepared by the relevant state authorities and define the SPV's arrangements for monitoring the relocation process and reporting progress and outcomes to the Lenders. Document the entire grave relocation process and report on compliance with Khokymiat protocol and good international practice (via a Grave Relocation Completion Report).	Cultural Heritage Management Plan Grave relocation completion report submitted to Lenders. Final Cultural Heritage Management Plan acceptable to the Lenders.	Prior to commencement of Construction Once the grave relocation has been completed.

ESAP #	Topic	Requirement	Target and Evaluation Criteria for Successful Implementation	Timeframe
29	Stakeholder Engagement	Implement the Project Stakeholder Engagement Plan (SEP) throughout the Project lifecycle, ensuring compliance with national and Lenders' information disclosure, consultations and reporting requirements including immediate roll-out of grievance mechanism for the project During SEP implementation, review the effectiveness of stakeholder engagement, grievance management and SEP monitoring results, on an annual basis and update and disclose the SEP, as required. Update the SEP in case of Project changes to reflect new stakeholders and impacts.	Up-to-date stakeholder mapping and stakeholder register maintained. Grievance mechanism rolled out. Stakeholder engagement records and disclosure materials including master grievance log submitted to Lenders. Periodic SEP review and update records.	Ongoing implementation throughout construction and operation. Annually and following material Project changes.