

Environment and Social Compliance Audit Report

Project Number: 50146-003
June 2021

Armenia: ENA Investment Program Phase 2 Volume 2

Prepared by TETRA TECH for Asian Development Bank.

The environmental and social compliance audit report is a document of the borrower. The views expressed herein do not necessarily represent those of ADB's Board of Directors, Management, or staff, and may be preliminary in nature.

In preparing any country program or strategy, financing any project, or by making any designation of or reference to a particular territory or geographic area in this document, the Asian Development Bank does not intend to make any judgments as to the legal or other status of any territory or area.

ENA - Modernization of Distribution Network
Environmental and Social Action Plan
Phase 2: Final Report



**ELECTRIC NETWORKS
OF ARMENIA**

Prepared by



TETRA TECH

June 2021

ACRONYMS/ABBREVIATIONS

Acronyms/Abbreviations	Definition
ADB	Asian Development Bank
CAP	Corrective Action Plan
CEO	Chief Executive Officer
CSR	Corporate social responsibility
EBRD	European Bank of Reconstruction and Development
EE	Environmental Expert
ENA	Energy Networks of Armenia
EHS	Environmental Health and Safety
ERP	Emergency Response Plan
ESCA	Environmental and Social Compliance Audit
ESAP	Environmental and Social Action Plan
ESMS	Environmental and Social Management Ssystem
EU	European Union
E&S	Environmental and Social
GBV	Gender Based Violence
GIIP	Good International Industry Practice
GRM	Grievance Redress Mechanism
HWSF	Hazardous Waste Storage Facility
IFC	International Finance Corporation
IMS	Integrated Management System
IOSH	Institution of Occupational Health and Safety
ISO	International Organization for Standardization
IP	Investment Program
LARF	Land Acquisition and Resettlement Framework
MAC	Maximum Allowable Concentration
MOE	Ministry of Environment

Acronyms/Abbreviations	Definition
OHS	Occupational Health and Safety
PCB	Polychlorinated Biphenyls
POP	Persistent Organic Pollutants
PPE	Personal Protective Equipment
PR	Performance Requirement
RA	Republic of Armenia
RAP	Resettlement Action Plan
RESA	Rapid Environmental and Social Assessment
RF	Resettlement Framework
RoW	Right of Way
SEP	Stakeholder Engagement Plan
SF ₆	Sulphur Hexafluoride
SPS	Safeguard Policy Statement
SR	Safeguard Requirement

1.0 INTRODUCTION

This document is the Environmental and Social Action Plan (ESAP) describing the environmental & social mitigation and monitoring measures, the criteria for their successful implementation and organizational measures to be implemented during rehabilitation and upgrading works and operational phase of the Project.

The ESAP is a 'live' document which needs to evolve with the Project. Electrical Networks of Armenia (ENA) will regularly review and update the ESAP as required to ensure it reflects any changes in the project implementation and organization.

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
1. Assessment and Management of Environmental and Social Impacts and Issues (EBRD PR1 / ADB SPS SR 1 / IFC PS1)						
1.1 Environmental and Social Assessment	1. Ensure that Rapid Environmental and Social Assessments (RESAs) are completed on time and in line with Lenders requirements.	Completing RESAs will help ensure compliance with lenders requirements.	IFC PS 1 EBRD PR 1 ADB SR1	Own resources ENA Environmental Expert (EE)	Within 3 months following commitment	1. RESAs completed for each Investment Plan (IP) in line with lenders requirements.
	1. Formalize a project screening mechanism based on the recommendations of the Environmental and Social Compliance Audit (ESCA).	Without screening some activities may be undertaken in sensitive sites resulting in significant environmental and social impacts.	IFC PS 1 EBRD PR 1 ADB SR1	Own resources external consultants & ENA EE	Within 3 months following commitment	1. Screening mechanism developed. 2. Screening undertaken for Phase 2 projects (and available for inspection).
1.2 Environmental and Social Management Systems	1. Address the 'observations' and 'non-conformities' identified as part of the ISO14001 audit.	Certification may be revoked.	ISO 14001 IFC PS 1 EBRD PR 1 ADB SR1	Own resources	Within 2 months following commitment	1. Continued certification to ISO standards.
	1. Develop monitoring & inspection and internal audit plans for 2021 that includes not only contractors' performance monitoring, but also all requirements from EBRD, ADB, IFC	Development of the plan will help the project be compliant with Lenders requirements	ISO 14001 ISO 45001 ISO 50001 IFC PS 1 EBRD PR 1 ADB SR1	Own resources external consultants & IMS	Within 3 months following commitment	1. Plans developed for 2021.

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	related to environment, OHS and energy efficiency.	and contractual obligations.		Department		
1.3 Organizational Capacity and Commitment	<p>Board Level</p> <ol style="list-style-type: none"> Assign one of the board members with significant experience in the industry and an applied understanding of sector-specific E&S issues to provide oversight of E&S risk management. If the board does not have the requisite knowledge, it should be prioritized in director education and/or recruitment. Include in the board scope of work the E&S Mandate and E&S aspects are integrated into company's strategy and clear E&S leadership & direction is provided. 	<p>The board plays a crucial role in overseeing communicating its position on E&S issues to management, and elevating E&S management as a long-term corporate priority.</p> <p>Despite high exposure to E&S risks, ENA's current board has not integrated E&S into the corporate strategy nor has it assigned a board member responsible for oversight of E&S risks.</p>	IFC PS 1 EBRD PR 1 ADB SR1	Own resources	31 st October 2021, to align with IFC ESAP or before second disbursement, whichever comes first.	<ol style="list-style-type: none"> Board minutes which reflect the assignment of one board member as the E&S focal point Updated board charter which includes the expanded scope.

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	<p>HQ Level</p> <ol style="list-style-type: none"> 1. Strengthen the capacity of the EE, with specific focus on Biodiversity aspects and waste management. 2. Hire a dedicated Social Specialist to manage the social components of the Project. 3. Reorganize the reporting channels of the Occupational Health and Safety (OHS) team so they report directly to ENA CEO. 4. Annual review of IMS department team capacity and any requirements for team strengthening and / or training. 	<p>Training the EE in additional areas of interest, e.g., biodiversity and waste management, will help them identify potential impacts during the project screening phase.</p> <p>A dedicated social specialist will place social responsibilities in one place, instead of in various locations around the company.</p> <p>Currently, there is a risk that the board may not be fully aware of OHS issues, direct reporting</p>	<p>IFC PS 1 EBRD PR 1 ADB SR1</p>	<p>Own resources</p> <p>Training provided by external consultants</p>	<p>Within 6 months following commitment or before second disbursement, whichever comes first</p>	<ol style="list-style-type: none"> 1. Training program for EE completed 2. Social Specialist hired 3. OHS reporting structure updated. 4. Annual review of IMS department team capacity.

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
		to the CEO should ensure this is not the case.				
	<p>Branch Level</p> <ol style="list-style-type: none"> 1. Map all Branch Environmental, Health and Safety (EHS) staff, assess their qualifications for the job, and provide training where necessary. 2. Hire 2 dedicated staff for the Hazardous Waste Storage Facility (HWSF). 	It is possible that some Branches may not have a full quota of suitable EHS staff which could lead to accidents and environmental incidents.	IFC PS 1 EBRD PR 1 ADB SR1	Own resources Training provided by external consultants	Within 6 months following commitment or before second disbursement, whichever comes first	<ol style="list-style-type: none"> 1. Branch EHS staff mapped and review of qualifications completed. 2. Training provided to Branch Staff. 3. Dedicated staff hired at HWSF.
1.4 Supply Chain Management	<ol style="list-style-type: none"> 1. A contractor accountability system should be developed and implemented as soon as possible which is designed to modify contractor behaviour and performance. 	Without a system there are risks that contractors will be non-compliant with environmental, social and health and safety laws and standards, as well as lenders safeguard policies and statements.	IFC PS 1 EBRD PR 1 ADB SR1	Own resources	Within 6 months following commitment or before second disbursement, whichever comes first	<ol style="list-style-type: none"> 1. System developed. 2. Contractors monitored by ENA IMS department.

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
1.5 Project Monitoring and Reporting	<ol style="list-style-type: none"> Ensure all serious accidents are reported to ENA according to their contract with the Lenders. E&S performance implementing ESMS shall be reported in accordance with Lender's requirements. 	Any accident or fatality or unmitigated risk that may result in environmental and community impacts represents a significant reputational risk to lenders and a risk of non-compliance with national safety regulations.	IFC PS 1 EBRD PR 1 ADB SR1 RA Labour Code	Own resources OHS Department	With immediate effect.	<ol style="list-style-type: none"> All accidents and incidents reported to Lenders in line with their contractual obligations. ESMS Reporting in line with Lenders requirements.
3. Labour and Working Conditions (EBRD PR2 / IFC PS 2 / ADB SPS)						
2.1 Human Resource Policies and Working Relationships	<ol style="list-style-type: none"> Update Human Resources Management Policy to improve the sections on forced and child labour. 	Prevention of child and forced labour, harassment and gender-based violence.	IFC PS2 /PS4 EBRD PR 2/PR2 ADB SPS	Own resources, external consultants	6 months after commitment	Revise Human Resource Management Policy
	<ol style="list-style-type: none"> Develop a Code of Conduct. The Code of Conduct (including details on company values, employee behaviors, dress code, tardiness/absenteeism, 	Prevention of harassment and gender-based violence, forced and child	IFC PS2 /PS4 EBRD PR 2/PR2 ADB SPS	Own resources, external consultants	6 months after commitment	Revise Human Resource Management Policy. Develop Code of Conduct.

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target Evaluation Criteria for Successful Implementation
	conflict of interest, disclosure of confidential information, external activities, details on zero tolerance of sexual harassment and gender-based violence, child and forced labour, anti-corruption, etc.) shall be applicable for ENA and Contractors (the requirement of adherence to the provisions of Code of Conduct shall be added to Contractors Management Procedure).	labour, corruption, etc.				Update Contractors Management Procedure
2.2 Non-Discrimination and Equal Opportunity	1. The company will assess and revise their Human Resource Management Policy, materials, communication strategy and training to promote equal opportunity, encourage male and female applicants and improve female retention and promotion.	Maximizing participation in the workforce	IFC PS2 /PS4 EBRD PR 2/PR2 ADB SPS	Own resources, external consultants	6 months after commitment	Revise Human Resource Management Policy
2.3 Wages, benefits, and conditions of work and	1. Update Human Resources Management Policy to improve the sections on overtime and business trips	Minimizing negative social impacts.	IFC PS2 /PS4 EBRD PR 2/PR2 ADB SPS	Own resources, external consultants	6 months after commitment	Revise Human Resource Management Policy

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target Evaluation Criteria for Successful Implementation
accommodation						
2.4 Retrenchment	1. Develop a Retrenchment Policy, in line with the Armenian Regulatory requirements and applicable Lender requirements. The policy shall outline the commitments of the company in terms of process and worker entitlements in the event of retrenchment.	Minimizing negative social impacts related with retrenchment.	IFC PS2 EBRD PR 2 ADB SPS	Own resources, external consultants	First 3 months following commitment	Retrenchment Policy
	1. In case of retrenchment (affecting at least 10% of the Borrower's total employees or 30 of its employees (whichever is lesser) over a 30-day period), ENA to develop a Retrenchment Management Plan in line with the Armenian Regulatory requirements and applicable Lender requirements (EBRD PR2, IFC PS2). The plan shall mitigate as much as practicable the adverse impacts of retrenchment on employees. The plan will be based on the principle	Minimizing negative social impacts related with retrenchment.	IFC PS2 EBRD PR 2 ADB SPS	Own resources, external consultants	3 Months prior to any retrenchment.	Retrenchment Management Plan. Notification of planned retrenchment to Lenders

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target Evaluation Criteria for Successful Implementation
	<p>of non-discrimination and will reflect the client's consultation with employees, Trade Union, and the government (state agencies).</p> <p>2. ENA shall promptly (but no later than 30 days before any decision is taken in respect of such planned collective dismissal) notify the Lenders</p>					
2.5 Grievance Mechanism	<p>1. Update the Grievance Redress Procedure to include specific treatment of harassment / gender-based violence (GBV) grievances, including provisions to allow for anonymity and confidential reporting.</p> <p>2. The updated Procedure will include the mechanism to record grievances that are resolved outside the formal system.</p> <p>3. Provision of additional avenues to communities to lodge grievances shall be considered.</p> <p>4. The Grievance officers shall be trained, and</p>	<p>Prevention of harassment and gender-based violence.</p> <p>Recording of grievances resolved outside the formal system.</p> <p>Opportunity to receive grievance in case of COVID-19 lockdowns (or similar events)</p>	<p>IFC PS2 /PS4 /PS5 EBRD PR 2 /PR4 / PR 5 ADB SPS</p>	<p>Own resources, external consultants</p>	<p>3 months after commitment</p>	<p>Updated Grievance Redress Procedure</p>

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target Evaluation Criteria for Successful Implementation
	employees shall be informed i.e., harassment / GBV.					
2.6 Non-Employee Workers	1. Provide priority to the laid-off employees when hiring non-employee workers. This requirement shall be incorporated in the Retrenchment Policy.	Minimizing negative social impacts related with retrenchment.	IFC PS2 EBRD PR 2 ADB SPS	Own resources, external consultants	First 3 months following commitment	Retrenchment Policy
2.7 Supply Chain	1. Review Contractor Management Procedure to include changes in Human Resources Management Policy, Grievance Redress Procedure, other documents (with a special attention to prevention of harassment, gender-based violence, forced and child labour)	Minimizing negative social impacts.	IFC PS2 EBRD PR 2 ADB SPS	Own resources, external consultants	3 Months prior to any retrenchment.	Revise Contractor Management Procedure
Resource Efficiency and Pollution Prevention and Control (EBRD PR3/ IFC PS 3 / ADB SPS SR 1)						
3.1 Water (and soil) contamination	Contaminated Sites Inventory	Polluted soils and groundwater	IFC PS 3 EBRD PR 3 ADB SPS SR1	Own resources,	1. Status Update on the contaminated site inventory by	1. Map of historically contaminated

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	<p>1. Develop a contaminated sites inventory which identifies all locations of likely historical contamination (soil & groundwater) and quantifies and delineates contaminant concentrations and volumes of contaminated materials. Intrusive investigation techniques may be required if areas of significant contamination or potential sensitive receptors are identified. The inventory shall include a risk assessment which ranks identified locations based on the 'source-pathway-receptor' pollutant linkages approach.</p> <p>2. Based on the risk assessment, Remediation Action Plans shall be developed and implemented for high risk contaminated sites to avoid or minimize significant adverse impacts on</p>	<p>can adversely impact human health and the environment.</p>	<p>IFC EHS Guidelines – Contaminated Land EU Directive 2004/35/EC Dutch Standards for Soil Quality Republic of Armenia (RA) Maximum Allowable Concentration (MAC) for soil quality RA Act on Water</p>	<p>external consultants</p>	<p>31-Jul-2021 (to align with IFC ESAP) 2. Detailed Contaminated site inventory developed within 9 months of commitment or before next disbursement whichever comes first. 3. High risk sites remediated within 12 months of commitment or before next disbursement whichever comes first</p>	<p>sites with quantified contamination levels and Remediation Action Plans (RAP) 2. Implementation of the developed RAPs.</p>

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	human health and the environment.					
	<p>Site Drainage</p> <p>1. Review the drainage systems at all sites where transformers and other oil containing liquids are stored. Ensure that oils cannot migrate off site with appropriate mitigation measures where necessary</p>	Polluted soils and groundwater can adversely impact human health and the environment.	IFC PS 3 EBRD PR 3 ADB SPS SR1 RA Decree on Nature Protection RA Act on Water EU Directive 2004/35/EC Dutch Standards for Soil Quality RA MAC for soil quality	Own resources ENA EE	First 3 months following commitment	<ol style="list-style-type: none"> 1. Drainage systems review reports completed. 2. Any identified areas of risk upgraded.
	<p>Spill / Leak Containment</p> <p>1. Ensure that all substations that are part of the IP include measures to capture all potential spills and leaks from large transformers, including from valves.</p> <p>2. Acid spills kits (and Personal Protective Equipment (PPE)) are available at all facilities where batteries are stored. Further, in any areas where lead acid</p>	Polluted soils and groundwater can adversely impact human health and the environment.	IFC PS 3 EBRD PR 3 ADB SPS SR1 RA Decree on Nature Protection RA Act on Water EU Directive 2004/35/EC Dutch Standards for Soil Quality	Own resources ENA EE	First 3 months following commitment	<ol style="list-style-type: none"> 1. Substation upgrades completed. 2. Acid spill kits at all sites where acid batteries are kept. 3. Acid battery storage compliant with requirements. 4. Abovyan bunding works completed. 5. The spill containment

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	<p>batteries are stored adequate ventilation shall be provided. Batteries shall also be stored within non-corrosive bunds.</p> <p>3. Rehabilitate the concrete bunding at Abovyan oil storage site.</p> <p>4. The spill containment pallets in Abovyan warehouse should be emptied of water regularly to ensure they have the necessary capacity to capture oil.</p>		RA MAC for soil quality			pallets checked regularly
	<p>Transformer Design</p> <p>1. Consult with the manufacturers of kiosk transformers to include containment measures beneath the transformers within the kiosk.</p>	Polluted soils and groundwater can adversely impact human health and the environment.	<p>IFC PS 3 EBRD PR 3 ADB SPS SR1 RA Decree on Nature Protection RA Act on Water EU Directive 2004/35/EC Dutch Standards for Soil Quality RA MAC for soil quality</p>	<p>Own resources</p> <p>Procurement Department & ENA EE</p>	First 3 months following commitment	<p>1. Kiosk transformer designs updated.</p> <p>2. Kiosk transformers installed with containment measures.</p>

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	<p>Training</p> <p>1. Undertake a program of training specifically relating to the storage of hazardous liquids at all branch warehouses.</p>	<p>Polluted soils and groundwater can adversely impact human health and the environment.</p>	<p>IFC PS 3 EBRD PR 3 ADB SPS SR1</p>	<p>Own resources</p> <p>External consultants</p>	<p>First 3 months following commitment</p>	<p>1. Staff trained.</p>
3.2 Wastes	<p>Waste Transport & Tracking</p> <p>1. Develop a 'waste transport & tracking procedure', including a chain of custody system to demonstrate that all waste (hazardous & non-hazardous) sent from the project site are transported by a licensed carrier to a licensed final disposal facility in a manner meeting the Performance Standard 3 objectives. This will also include a method to track waste received at the HWSF (via computer software).</p> <p>2. Analyze the utilization rate of its current designated vehicle to transport hazardous wastes by assessing the</p>	<p>Lack of waste tracking system may lead to inappropriate disposal of project wastes.</p> <p>One designated vehicle to manage the transportation of hazardous waste to the HWSF will not be sufficient considering the great distances it would have to travel. This is especially important considering the limited space observed at the</p>	<p>IFC PS 3 EBRD PR 3</p>	<p>Own resources, external consultants</p>	<p>3 months following commitment</p>	<p>1. Implementation of waste transport & tracking procedure.</p> <p>2. Additional vehicles procured when the current designated vehicle utilization rate reaches 70%.</p>

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target Evaluation Criteria for Successful Implementation
	<p>number of days it is being operated as a percentage of total available time (i.e., workdays). Days in which the vehicle is unavailable due to mechanical issues should also be counted as operated. When the vehicle utilization rate reaches 70%, ENA should procure another vehicleSize and specification to be confirmed between ENA and Lenders.</p>	<p>branch warehouses where hazardous waste is temporarily stored.</p>				
	<p>Hazardous Waste Storage Facility 1. Ensure all the recommendations of the HWSF design review indicated in the Phase 1 corrective action plans are implemented.</p>	<p>Without implementation of these corrective actions potential environmental incidents could occur that may result in pollution of the environment, and possible impacts to human health.</p>	<p>IFC PS 3 EBRD PR 3 ADB SPS RA Law on Waste EU Directive 2006/66/EU on Batteries and Accumulators Directive 2008/98/E on Waste</p>	<p>Own resources</p>	<p>Prior to 1st disbursement.</p>	<p>1. Corrective actions completed.</p>

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	<p>Waste Management Contracts</p> <ol style="list-style-type: none"> 1. Ensure that contracts with waste management companies are up to date (with the exception of Am-Eska – their contract should not be renewed at this stage). 2. The Contractors Management Procedure established by ENA should be followed for all new contracts going forward and apply the contractor accountability requirements from ESAP item 1.4. 3. ENA should obtain all the necessary information from current contractors in accordance with the Contractors Management Procedure. 4. ENA needs to ensure it is following through on its own responsibilities outlined in its Contractors Management Procedure, including the following: 	<p>Non-compliance with national waste management laws.</p>	<p>IFC PS 3 EBRD PR 3 ADB SPS RA Law on Waste Directive 2008/98/E on Waste</p>	<p>Own resources</p>	<p>IMS team to review the existing contractor's contract and performance and ENA's responsibilities with the contractors against the applicable E&S procedures. First audit report completed before first disbursement.</p> <p>3 months following commitment</p>	<ol style="list-style-type: none"> 1. Contracts with waste management companies in place to cover this list of actions. 2. ENA IMS department audit on Contractors (routinely after first audit, every three months)

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target Evaluation Criteria for Successful Implementation
	<ul style="list-style-type: none"> a) Defining required safety and environmental precautions b) Assessing contractor controls and defining the need of additional controls c) Inspecting the certificates of tools and equipment to be used by the Contractor d) Monitoring ENA IMS department performance 5. ENA needs to ensure that contractors are adhering to their Hazardous Materials Safe Management Procedures as well as their Work Instruction of Collecting and Storing of Used Oils 6. Subcontractor's contracts clauses should be added noting that any asbestos waste will be sent to the HWSF. 7. ENA needs to ensure that regular site visit monitoring is conducted by the IMS Department 					

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	as well as its OHS staff at the branch offices.					
	<p>Staff Training and Capacity</p> <ol style="list-style-type: none"> 1. Provide training programs for ENA staff in waste management. 2. Provide additional qualified staff at the HWSF. 	Without adequate training staff may mishandle waste which could result in pollution events or harm to their health. At present only one dedicated staff member is employed at the HWSF, another junior member should be employed and trained to help manage the facility.	IFC PS 3 EBRD PR 3 ADB SPS RA Law on Waste	Own resources	3 months following commitment	<ol style="list-style-type: none"> 1. Training completed. 2. Additional staff employed
3.3 Hazardous Substances and Materials	<p>PCBs</p> <ol style="list-style-type: none"> 1. Continue the Polychlorinated Biphenyl's (PCB) testing program with MOE. If ENA are experiencing delays with Ministry of Environment (MOE) testing they should 	Results to date show that there are oil containing transformers with elevated levels of PCBs. PCBs are toxic	IFC PS 3 ADB SPS EBRD PR 3 National Implementation Plan for the Stockholm Convention on	Own resources & Government laboratory	Develop testing program with timeline for implementation by 31 October 2021 (aligned with IFC ESAP)	<ol style="list-style-type: none"> 1. PCB testing program with clear timelines for testing 2. Tests completed on schedule 3. Inventory of all PCB containing transformers.

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	<p>explore other options for testing, e.g., transport to other countries.</p> <p>2. ENA to provide monthly updates to Lenders on the PCB testing program progress.</p> <p>3. The testing program should be expanded to cover other oil-filled equipment.</p>	<p>and can have long lasting environmental impacts if they are released because of a spill or leak.</p>	<p>Persistent Organic Pollutants (POPs). IFC EHS Guidelines for Power Transmission and Distribution</p>		<p>Updated PCB testing program to include other oil-filled equipment within 6 months of commitment.</p> <p>Monthly reporting on program progress to Lenders</p>	<p>4. Mark all tested transformers as red or green.</p> <p>5. End of life red labelled transformers stored at the waste storage facility.</p> <p>6. Monthly PCB reporting to Lenders.</p>
	<p>1. Prepare a PCB management strategy to include:</p> <p>a. Details of the testing program (noted above).</p> <p>b. Updated inventory of all PCB containing equipment, including those tested by UNIDO in 2009.</p> <p>c. Method to test transformers for PCBs during maintenance works.</p> <p>d. Ensuring any used oil, regenerated oil and oil</p>		<p>IFC PS 3 EBRD PR 3 National Implementation Plan for the Stockholm Convention on POPs. RA Law on Waste IFC EHS Guidelines for Power Transmission and Distribution</p>	<p>Own resources, external consultants</p>	<p>Develop Strategy within 6 months after completion of testing program.</p> <p>Implementation according to the Schedule – throughout the project.</p>	

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	contaminated equipment are sent to the HWSF and not recycled unless they have tested negative for elevated levels of PCBs.					
	<p>Other Oil Filled Equipment</p> <ol style="list-style-type: none"> 1. Collect and store oil-filled switchers (and any other oil filled equipment) at the HWSF in the same area as waste transformers. 2. A separate instruction for the management of waste oil-filled circuit switchers should be prepared and included in ENAs IMS. 3. Prepare a procedure for management of any leaking transformers or oil-containing equipment. The procedures should assume that any such equipment comprises elevated levels of PCBs and should be transferred to the HWSF. 	Improper disposal of other oil filled equipment could result in pollution of soils and groundwater. Further, it is possible that these oils may contain elevated levels of PCBs.	IFC PS 3 EBRD PR 3 National Implementation Plan for the Stockholm Convention on POPs. RA Law on Waste IFC EHS Guidelines – Hazardous Materials Management IFC EHS Guidelines for Power Transmission and Distribution	Own resources, external consultants	Storage of waste to commence with immediate effect Instruction and procedure to be developed within 3 months of commitment.	<ol style="list-style-type: none"> 1. Instruction for oil-filled switchers completed. 2. Procedure for leaking transformers completed.

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	<p>Asbestos</p> <ol style="list-style-type: none"> Asbestos survey of all buildings to be upgraded. Ensure both ENA staff and their contractors undertaking upgrading works are trained in the asbestos management procedures. All asbestos waste removed by ENA's contractors needs to be accounted for, tracked, handled, and stored appropriately in the HWSF. 	<p>Asbestos represents a significant potential health issue if it is broken or crushed generating fine fibers that can be inhaled by workers</p>	<p>IFC PS 3 ADB SPS EBRD PR 3 IFC EHS Guidelines – Hazardous Materials Management</p>	<p>Own Resources External surveyors</p>	<p>First batch of asbestos training through EBRD online modules completed before first disbursement.</p> <p>Surveys completed prior to the commencement of any rehabilitation works.</p>	<ol style="list-style-type: none"> Training completed (with training materials available for review). Asbestos surveys completed (and available for review). ENA IMS departments audit reports on contractor's compliance with Waste Management Procedures and Hazardous Materials Safe Management Procedure. Record of amount of asbestos waste stored at the HWSF matches reported amounts on asbestos waste passports and included in the monitoring report to Lenders.
<p>Health and Safety (EBRD PR4 / IFC PS1 sec.20-21 – Emergency Preparedness and Response / IFC PS4 Community Health and Safety and Security / ADB SPS)</p>						

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
4.1 Occupational Health and Safety	1. Undertake a detailed benchmarking the OHS aspects of ENAs IMS against Good International Industry Practice (GIIP) and the IFC EHS General guidelines and sector guidelines for electrical transmission and distribution to identify material gaps. This should include review of the electrical isolation procedure to ensure all electrical equipment is disconnected from all energized equipment by adequate physical separation and independently tested and verified as isolated by someone outside the work party prior to any work.	Without detailed benchmarking it is not possible to determine the material compliance with national and international requirements.	IFC PS2 EBRD PR4 ADB SPS	Own resources External consultants	First 6 months following commitment	1. Benchmarking completed by external OHS consultants 2. Enhanced electrical isolation procedure completed and included in ENAs IMS.
	2. Procure and undertake an external H&S audit of ENA operations and practices on the ground to identify areas for improvement. The Audit shall be undertaken by qualified auditor with international experience in H&S good practice in	Apart from the IMS, specific processes and practices on the ground should be reviewed against international practice to	IFC PS2, EBRD PR4, ADB SPS	External Consultant procured from ENA resources	Before second disbursement	1. 1.Audit procured and completed 2. audit reports and list of corrective actions shared with Lenders, 3. plan for implementation of corrective

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	the electricity distribution sector. 3. Prios to engagement agree the consutant and the scope with Lenders	minimize risks and reduce accidenst occrance.				actions developed.
	3. Update the OHS management arrangements to align the system with GIIP, to address the ISO 45001 surveillance audit non-conformities so that it is demonstrably suitable and sufficient to effectively manage the foreseeable OHS hazards and risks and ensure legal compliance.	Non-compliance with legal requirements and lenders policies and procedures. Potential accidents and incidents.	IFC PS2 EBRD PR4 ADB SPS	Own resources External consultants	First 6 months following commitment	4. OHS management system aligned with GIIP according to the findings of the benchmarking exercise.
	1. Develop a comprehensive Incident Reporting, Classification, and Investigation Process (including root cause analysis) in line with International Best Practice, to include both incidents & near misses etc. 2. Communicate significant incidents, root causes, remedial actions and lessons learned to all workers and contractors. Ensure senior	Lack of adequate incident reporting & investigations may lead to repeat incidents	IFC PS2 EBRD PR4 ADB SPS	Own resources, external consultants	Prior to first disbursement.	1. Incident reporting and investigation procedure

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target Evaluation Criteria for Successful Implementation
	management takes active participation in the methods of communicating to demonstrate safety leadership to the workforce.					
	<ol style="list-style-type: none"> 1. Build internal capacity by rolling out a program of OHS training sessions coupled with visits to sites that are demonstrably meeting good international practices. 2. Deliver IOSH Managing Training to key Managers and supervisors who have responsibilities with managing field-based work tasks. These workers will become Health and Safety Leaders within the organization and involved in raising health and safety awareness among the workforce. 	Without adequate training staff accidents and incidents will continue to occur amongst staff. Training programs will help reduce the chances of accidents and incidents happening and could potentially save lives.	IFC PS2	External consultants	First 6 months following commitment	1. Provide training material and records of individuals trained
4.2 Community Health and Safety	1. Review the plans for public safety campaigns to identify opportunities to strengthen. Ensure safety communication to the public uses various	ENA facilities that are poorly maintained pose a risk to community	IFC PS4 EBRD PR 4 IFC EHS Guidelines – Electric Power	Own resources	Banner, poster and booklet campaign in branches will start from June 15..	1. Community awareness materials such as brochures distributed to communities

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	<p>media outlets including social media.</p> <p>2. Review past 5 years data related to 3rd parties associated with electrocutions and analysis the demographics and target campaigns accordingly.</p> <p>3. Ensure that Corporate Social Responsibility (CSR) programs include safety awareness brochures that can be distributed to schools and residents. Brochures to include information relating to hazards of substations, poles, transformers and distribution lines.</p>	<p>safety. ENA facilities, notably substations in urban areas, are a safety risk if residents are unaware of the dangers these facilities can pose.</p>	<p>Transmission and Distribution IFC EHS Guidelines – Community Health and Safety</p>		<p>TV campaign will start after parliament election</p> <p>Awareness campaign in schools will be started from September 1.</p>	<p>where electrical equipment is present.</p> <p>2. Contract with relevant media agency for preparation this and agreement with TV stations to run this in July</p> <p>3. Evidence of preparation to this: reach out to school and agreements to arrange this in September, materials designed and prepared for kids_</p>
	<p>1. Continue preparing 'passports' for all substations</p> <p>2. Ensure that all live electrical equipment cannot be accessed by the public (including pole mounted and kiosk transformers), and ensure facilities are adequately fenced or contained.</p> <p>3. Industrial areas where private businesses are</p>	<p>Members of the local community could access sites illegally which may result in serious accidents.</p> <p>Members of the local community could interact with live</p>	<p>IFC PS4 EBRD PR 4 IFC EHS Guidelines – Electric Power Transmission and Distribution IFC EHS Guidelines – Community</p>	<p>Own resources</p>	<p>Throughout Phase 2</p> <p>Pending issue in Gyumri addressed within 3 months of commitment</p>	<p>1. At least 15 passports prepared annually.</p> <p>2. All 15 sites audited by ENA IMS department to ensure they are now complaint with safety guidelines.</p> <p>3. Ensure all Phase 2 transformers are designed to</p>

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	<p>concentrated that may be operating heavy equipment on a regular basis or not compliant with safety distance, (e.g. Gyumri site where previous accidents occurred) should be reviewed to determine risks.</p> <p>4. All poles will be fitted with electrical hazard warning signs.</p>	<p>equipment which may result in serious accidents.</p>	<p>Health and Safety National technical standards for pole mounted transformers and kiosk transformers.</p>			<p>prevent access or tampering by local community.</p> <p>4. Line modification (e.g. insulation or buried) to be done</p> <p>5. All ENA poles fitted with safety warning signs.</p>
	<p>1. Develop a noise monitoring procedure which is in-line with the IFC EHS Guidelines for noise.</p> <p>2. Once completed ENA should undertake retroactive noise monitoring of all locations where complaints have been received during Phase 1 to date.</p>	<p>Elevated noise levels from equipment may result in non-compliance with best practice. Noise can be a nuisance, and even a health impact to residents.</p>	<p>IFC Guidelines for Noise</p>	<p>Own resources</p> <p>External consultant</p>	<p>Noise monitoring procedure within 3 months of commitment.</p> <p>Retroactive noise monitoring within 3 months of commitment.</p>	<p>1. Procedure completed and included in IMS.</p> <p>2. Retroactive noise monitoring completed for at least the 2020 sites discussed in the ESCA</p>
4.3 Infrastructure, Building, and Equipment Design and Safety	<p>1. Complete the corrective actions specified under Phase 1 for HWSF.</p> <p>2. Complete the corrective actions specified under Phase 1 for Abovyan warehouse.</p>	<p>The corrective actions included issues such as improvements to ventilation systems and firefighting equipment.</p>	<p>IFC PS4 EBRD PR 4 ADB SPS IFC EHS Guidelines – Life and Fire Safety</p>	<p>Own resources</p>	<p>1. HWSF Corrective Action Plan (CAP) - Prior to first disbursement.</p> <p>2. Abovyan CAP – 3 months following commitment.</p>	<p>1. Corrective actions completed (See Appendix A & B).</p>

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
		Without these works serious harm to human health could occur.				
4.4 Hazardous Materials Safety	See section 3.7 above	See section 3.7 above	See section 3.7 above	See section 3.7 above	See section 3.7 above	1. See section 3.7 above
4.5 Traffic and Road Safety	1. Provide traffic and road safety policy training for staff.	Without training staff will be unable to meet the requirements of the policy	IFC PS4 EBRD PR 4 ADB SPS IFC EHS Guidelines – Traffic Safety	Own resources	3 months following commitment	1. Training completed
4.6 Emergency Preparedness and Response	1. Further assessment of an English version of the Emergency Response Plan (ERP). 2. Emergency Response / Contingency Plans prepared for HWSF and Abovyan oil storage facility.	Without further assessment of the ERP potential gaps with GIIP could remain which could result in accidents and incidents, including at the warehouse and HWSF.	IFC PS4 EBRD PR 4 ADB SPS IFC EHS Guidelines – Emergency Preparedness and Response	Own resources External Consultants	6 months following commitment	1. Assessment of ERP undertaken, and any recommendations discussed and agreed with ENA. 2. Plans prepared for HWSF and Abovyan.

Land Acquisition, Involuntary Resettlement and Economic Displacement (EBRD PR5 / IFC PS 5 / ADB SPS SR2)

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
5.1 Avoid or minimize displacement	<ol style="list-style-type: none"> Ensure that resettlement / displacement risks, including informal housing/structures and land use are addressed throughout the ESMS. Prepare the registry of informal structures located in the protection zone / Right of Way (RoW) of ENA infrastructure, and carry out risk assessment. This should cover cases where the operations of ENA will result in displacement. In the event of any displacement, EBRD, ABD and IFC will be immediately informed, and a Resettlement Action Plan (RAP) will be developed in line with Resettlement Framework (RF) / Land Acquisition and Resettlement Framework (LARF) and approved by EBRD / IFC / ADB prior to implementation. Update ENA's Involuntary Resettlement 	Legacy issue with significant number of informal structures (including houses) located in the RoW and /or safety zones of ENA.	IFC PS1 and PS5 EBRD PR1 and PR 5 ADB SPS	Own resources, external consultants	First 6 months following commitment	<ol style="list-style-type: none"> Updating of Involuntary Resettlement Management Procedure to a Resettlement Framework Land Acquisition and Resettlement Framework to ensure compliance with ADB, IFC and EBRD requirements. Prepare registry of informal structures located within protection zone / RoW of ENA. Prepare risk assessment report covering these informal structures and assess for potential IR impact.

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	Management Procedure to RF/LARF and fully aligned with EBRD PR5 / IFC PS5 / ADB SPS requirements including for informal housing and land use.					
5.2 Risk Assessment	<ol style="list-style-type: none"> 1. Conduct a risk assessment to identify if any of ENA investment activities will lead to any IR impact with respect to ENA's existing RoW and/or safety zones with existing informal structures. 2. Part of project screening enhancement will include assessment for potential involuntary resettlement in the context of safety risks. 	Legacy issue with significant number of informal houses located in the RoW and / or safety zones of ENA.	IFC PS1 and PS5 EBRD PR1 and PR 5 ADB SPS	Own resources, external consultants	First 6 months following commitment	Prepare risk assessment report identifying if a particular project investments due to potential safety risks will require physical relocation of informal structures within the safety zone or ENA RoW, and/or may lead to economic impact/loss
Biodiversity and Living Natural Resources (EBRD PR6 / IFC PS6 / IFC PS4 sec.8 Ecosystem Services / ADB SPS)						
6.1 Assessment of Biodiversity and Living Natural Resources	<p>Ensure that biodiversity related risks are adequately addressed via a specific biodiversity procedure which includes:</p> <ol style="list-style-type: none"> 1. Following the Stepwise biodiversity screening 	<p>ENA reportedly do not work in nationally protected areas.</p> <p>However, ENA's ESMS currently does</p>	<p>IFC PS 1 & 6 EBRD PS 1 & 6</p> <p>Factsheet: Mitigating biodiversity impacts of</p>	Own resources, external consultants	Procedures completed by 31 July 2021 (aligned with IFC ESAP)	Biodiversity-related risks are adequately addressed throughout the EMS and its component parts in line with EBRD PR6/IFC PS6, including:

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	<p>procedures outlined in the ESCA.</p> <ol style="list-style-type: none"> Train field staff to identify electrocuted birds. Implementing mitigation measures in line with the Biodiversity Factsheet if required by the screening process. Monitoring of distribution lines per the monitoring guidelines provided in the Biodiversity Factsheet. 	<p>not consider risks to Key Biodiversity Areas, Important Bird Areas etc., as well as the risks that overhead lines pose to birds from electrocution and collisions.</p>	<p>ENA's distribution network in Armenia</p>			<ol style="list-style-type: none"> Project Screening. Environmental Risk Register. Staff training program; and Monitoring and reporting.
<p>Information Disclosure and Stakeholder Engagement (EBRD PR10 / IFC PS1 sec.25- 36 Stakeholder Analysis and Engagement Planning/ ADB SPS)</p>						
10.1 Stakeholder Engagement Plan	<ol style="list-style-type: none"> Update the existing Stakeholder Engagement Plan (SEP) to include ongoing process of identification and assessment of stakeholders and interested parties, documenting engagement activities, considering additional measures for stakeholder engagement considering COVID-19 limitations. 	<p>Ensure that ongoing consultation is being implemented.</p>	<p>IFC PS1 EBRD PR10</p>	<p>Own resources Consultants</p>	<p>Updated SEP complete before first disbursement.</p>	<p>Update SEP in line with IFC. ADB and EBRD requirements.</p> <p>Database that compiles all stakeholder consultation documents and engagement activities that corresponds to each new activity. Link to the database be provided to Lenders.</p>

Environmental and Social Action Plan – Phase 2

Item	Action	Environmental and Social Risks (liability / Benefits)	Legislative Requirement / Best Practice	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
10.2 Operational Grievance Mechanism	1. Update and disseminate the community grievance mechanism to relevant stakeholder to ensure that persons not having access to the grievance format on ENA website also have opportunity to lodge grievance. Additional avenues for communities to lodge grievances (e.g., grievances boxes in town halls, post offices, public places, etc.) shall be considered.	The current Grievance forms are only available on the website of ENA and almost no grievances are being recorded. Ensuring broader access to the grievance mechanism can support the management team in identifying risks and impacts in a timely manner.	IFC PS1 EBRD PR10	Own resources Consultants	3 months after commitment	Updated Grievance procedure in line with IFC and EBRD requirements, dissemination strategy and plan and implementation.

Appendix A: HWSF Corrective Action Plan

Ref #	Requirement	Current Status	Phase 2 Action
CAPA #1	Ensure files of asbestos waste generated and storage locations are kept up to date and form part of the asbestos management procedures.	Not known, no tracking of asbestos waste by ENA.	Prepare an asbestos waste tracking procedure which is linked to the asbestos inventory and rood replacement works.
CAPA #4	The floors of storage sites inside buildings should be concrete coated with a durable epoxy polymer. Activity needs to be completed before acceptance of waste.	Not done	Complete corrective action.
CAPA #4	Install fire alarm systems. Activity needs to be completed before acceptance of waste	No fire alarms installed.	Install fire alarms.
CAPA #4	Storage sites inside buildings should have (preferably non-water) fire suppression systems. Activity needs to be completed before acceptance of waste.	No fire extinguishers inside building	Complete corrective action.
CAPA #4	Construct a suitable bund for lead battery storage area. Activity needs to be completed before acceptance of waste.	Not done	Complete corrective action.
CAPA #4	Mercury-containing lamps: This storage unit requires an air filtration unit for mercury vapor and the ventilation system should be separate from other storage rooms.	Very low volumes of waste are currently stored at the HWSF. However, there is no continuous filtration system.	Install continuous filtration system.
CAP A4	Lead-Acid Batteries: This unit needs its own, separate ventilation system to supply adequate air to dilute air to safe levels.	Natural ventilation is provided in this area.	In accordance with the International Mechanical Code, ventilation should be designed to limit the maximum concentration of hydrogen to 1% of the total volume of the room. Continuous ventilation shall be provided at a rate of not less than 1 cfm/sq. ft of floor area of the room.
CAPB # 2	ENA shall prepare a PPE procedure for the HWSF. Appropriate PPE for the handling of all waste types will be procured and training provided in their use.	There is no procedure, just PPE in a box.	Prepare procedure, procure adequate PPE, and provide training.

Environmental and Social Action Plan – Phase 2

Ref #	Requirement	Current Status	Phase 2 Action
		Some of the PPE is not good quality, e.g., gloves.	
CAPB # 5	Paint windows in HWSF	Not done	Complete corrective action.
CAPB # 7	Prepare a procedure and training program for clean-up of leaks for mercury leaks. Train staff in the procedure.	Not done	Complete corrective action.
CAPB # 10	Procure clean up kits specifically for acid leaks and prepare a procedure and training program for clean-up of leaks.	No spill kits	Complete corrective action.
CAPB # 14	Ensure firefighting equipment is installed in transformer storage area of HWSF.	No transformers in this area yet.	Complete corrective action.
CAPB #17	An inventory of waste shall be established to monitor all waste streams stored at the site.	They have an 'inventory'. However, they are just handwritten forms.	Procure a computer and develop a database to track waste at the facility.
CAPB #17	Prepare an intensive training program for HWSF staff as soon as COVID situation allows.	No training	Complete corrective action.
CAPB #17	Ensure monitoring of the HWSF by IMS staff.	No specific monitoring activities of the facility have been reported by ENA.	Complete corrective action.
CAPB #17	Ensure MSDS are kept on site once waste is delivered.	None visible	Complete corrective action.
CAPB #17	Ensure the first aid kit is compliant with OSHA 1910.266 App A.	First aid kit is in place but is not OSHA compliant.	Complete corrective action.
CAP B #18	Once the site procedures have been established (for the HWSF), prepare an intensive training program.	Not completed.	Complete CAP requirement.
CAP B2	No PPE for specific activities at the HWSF are currently available. E.g., PPE for handling lead acid batteries.	PPE not yet procured.	Procure PPE.

Appendix B – Abovyan Warehouse Corrective Action Plan

Ref #	Requirement	Current Status	Phase 2 Action
22	Oil containing equipment storage area at Abovyan warehouse is too small.	Increase the storage area capacity.	Increase the storage area capacity.
23	Drains in this area are not sealed.	Seal all drains.	Seal all drains.
24	Evaporation tanks at Abovyan could overflow.	Monitor tanks on a routine basis and take corrective actions if the tanks are full.	Continual monitoring.
25	Oil stored outside of bunds at Abovyan.	Store oils in bunds.	None
26	Oil containing equipment stored in the wrong locations.	Prepare a procedure for the acceptance of oil containing equipment for all warehouses and branches.	Prepare a procedure for the acceptance of oil containing equipment for all warehouses and branches.
27	There are no filling procedures for the bulk oil storage area in Abovyan.	Prepare filling procedures.	Prepare filling procedures.