

This document has been updated in 10.11.2022 by AYGM as a result of loan agreement.

No.	Action	Environmental and Social Risks (Liability / Benefits)	Requirement (Legislative, Lenders Requirements, Best Practice)	Resources, Investment Needs and Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation*	Status / Notes
PR1	Assessment and Management of Environmental and Social Impacts and Issues						
1.1	<p>Appoint a Project Implementation Unit (PIU).</p> <p>The PIU will be responsible for:</p> <ul style="list-style-type: none"> - Implementing AYGM responsibilities as defined in the Environment and Social Action Plan (ESAP) and the implementation of the Environmental and Social Management Plan (ESMP), Contractor Management Plan (CMP). and other associated documents including the Resettlement Action Plan (RAP), Emergency Response Framework (ERF), Biodiversity Management Plan (BMP), Rail Safety Plan (RSP) and Stakeholder Engagement Plan (SEP); - Managing and monitoring the compliance of Contractor and sub-contractors with the above documents; and - Preparing monthly progress reports on the environmental, health, safety and social (EHSS) aspects of the Project for the 	Compliance with EBRD Performance Requirements (PRs)	EBRD PR1 to PR10 (excluding PR7 and PR9).	<p>AYGM to appoint PIU.</p> <p>PIU to use their own resources to fulfil outlined responsibilities.</p> <p>Contractor to provide required inputs to progress reports, including reporting on the agreed metrics using their own resources.</p> <p>The personnel required for the PIU are set out in 1.5.</p>	<p>Monthly submission pre-construction, and construction.</p> <p>Annual reporting during operation</p>	<p>Submission of a Project progress report monthly (pre-construction, and construction) and annual (operation) to the Lenders that reports on:</p> <p>ESAP, ESMP, RAP, ERF, BMP, CMP implementation progress, effective EHSS performance, stakeholder engagement activities in line with the SEP and resolution of grievances.</p>	

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	Lenders, and monitoring reports of EHSS aspects every 6 months.						
1.2	<p>Appoint a Supervision Consultant, with a range of expertise, as specified in the CMP, to supervise the activities of the Contractor on a day to day basis</p> <p>The Supervision Consultant will supervise the Contractor to ensure that the requirements as set out in the ESIA, ESAP, ESMP, SEP, RAP, ERF, BMP, RSP and CMP are applied. The Supervision Consultant will assist in the preparation of monthly progress reports for the Lenders.</p> <p>Supervision Consultant to conduct regular inspection of Contractors' EHSS performance in accordance with a protocol approved by PIU, which will define the scope and frequency of the inspection.</p>	Compliance with EBRD Performance Requirements (PRs)	EBRD PR1 to PR10 (excluding PR7 and PR9).	<p>PIU to appoint Supervision Consultant.</p> <p>Supervision Consultant to implement regular supervision and inspection activities using their own resources, which will include the following personnel with the responsibilities as set out in the CMP:</p> <ul style="list-style-type: none"> - Supervision Contract Manager - Environmental Expert - Health and Safety Expert - Social Supervisor - Railway Safety Expert - Archaeological Supervisor - Land & Permit Supervisor 	To be appointed prior to the commencement of Construction	<p>Supervision Consultant Appointed by PIU.</p> <p>Supervision Consultant to prepare Monthly Progress reports, or more frequently when needed. This is to include reporting on agreed metrics and measures taken by the Contractor to address any non-conformances with EHSS performance, including OHS, and EBRD PRs.</p>	
1.3	<p>Develop and implement an Environmental and Social Management System (ESMS) for the Project's entire lifecycle.</p> <p>The ESMS must be compliant with international standards (ISO 14001:2015, and ISO 45001:2018), PR1, international conventions signed by Turkey, national regulation and requirements outlined in the</p>	Optimisation of environmental and social management through a formalised document and associated system.	EBRD PR1. Best practice.	<p>PIU to use their own resources.</p> <p>Contractor to align their ESMS with the PIUs ESMS (construction).</p> <p>Project ESMS to be handed over to TCDD / TCDD Transport (operation)</p>	PIU to implement ESMS (pre-construction and construction).	ESMS has been developed and implemented.	

	Project disclosure documents (i.e. ESIA, ESAP, ESMP, SEP, RAP, ERF, BMP, RSP and CMP).						
1.4	<p>Implement all mitigation measures identified in the ESIA, as detailed in the ESMP. AYGM to update the ESMP based on the updated studies carried out after the disclosure of ESIA, ESMP, RAP, SEP, and ESAP.</p> <p>Ensure the development of all the sub-plans listed in the ESMP, in line with national legislation and the EBRD's PRs for all phases of the Project.</p> <p>Ensure the Contractor develops a Construction Environmental and Social Management Plan (CESMP)</p> <p>Develop an Operation Environmental and Social Management Plan (OESMP) (to be prepared by the TCDD and TCDD Transport).</p> <p>Continually review and update, as a minimum annually and with Project and / or legislative changes. The ESMP is a live document that should be used to document and monitor the implementation of mitigation measures in the ESIA.</p>	Compliance with EBRD Performance Requirements (PRs)	EBRD PR1 to PR10 (excluding PR7 and PR9).	<p>AYGM to use their own resources to update and implement the ESMP.</p> <p>Contractor to use their own resources to prepare and implement the CESMP and all applicable sub-plans.</p>	<p>Updated ESMP prepared prior to the commencement of construction and updated annually, if required.</p> <p>Implementation of mitigation measures throughout the Project (pre-construction, construction and operation)</p>	<p>Updated ESMP prepared and used to monitor EHSS compliance during construction and operation.</p> <p>Mitigation measures identified in the ESIA have been implemented throughout Project's entire lifecycle.</p>	
1.5	Assign suitably qualified personnel to the PIU with EHSS management responsibilities, as	Clear EHSS management.	EBRD PR1. EBRD PR2.	PIU personnel to include the roles and responsibilities identified in	Pre-construction.	AYGM to assign or recruit the required resources.	

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	<p>detailed in the CMP. PIU to provide training and undertake recruitment as required.</p> <p>Require all Contractors to appoint suitably qualified EHSS personnel who are responsible for the implementation of the EHSS elements of the Project as per their scope of work. Minimum construction contractor EHSS personnel are specified in the CMP.</p>		<p>Best practice.</p>	<p>the CMP which include, but not limited to:</p> <ul style="list-style-type: none"> - PIU Manager - Environmental, Health and Safety, and Social (EHSS) Manager - Community Liaison Officers (CLOs) (2) - Environmental / Biodiversity Specialist - - Health and Safety Specialist - Human Resources / Labour Specialist - - Social and Resettlement Specialist - Section Manager from the Expropriation Department 		<p>Training for assigned personnel is completed as per training schedule.</p> <p>Contractor resources are in place</p>	
<p>1.6</p>	<p>Set-up, maintain and continually review an EHSS Incident Reporting Procedure to maintain records of monitoring, accidents and incidents, as required in the ESMP.</p>	<p>Management of EHSS accidents and incidents.</p>	<p>EBRD PR1. EBRD PR4. Best practice.</p>	<p>PIU to establish using its own resources.</p> <p>Monitoring by Supervision Consultant.</p> <p>Contractor to implement using its own resources (construction).</p> <p>TCDD Transport to implement using their own resources (operation).</p>	<p>Throughout (pre-construction, construction and during operation).</p>	<p>EHSS Incident Reporting Procedure is developed.</p> <p>Monthly progress reports are prepared by the Supervision Consultant and submitted to the Lenders via the PIU during construction.</p> <p>Quarterly progress reports are submitted to the Lenders by TCDD Transport during operation.</p>	

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<p>1.7</p>	<p>Implement the Design Change Management Procedure (DCMP) set out in the ESMP.</p>	<p>Management of EHSS impacts of the Project.</p>	<p>EBRD PR1.</p>	<p>AYGM elaborate and implement the procedure in the ESMP using their own resources.</p> <p>Contractor (when preparing the final design) to implement this procedure.</p>	<p>Prior to, and during construction.</p>	<p>DCMP is finalised and submitted to Lenders for no objection.</p> <p>The process, criteria and approval rights with regards to introducing any changes in the DCMP is agreed with the Lenders.</p>	
<p>1.8</p>	<p>Include the mitigation measures, including design-based measures, surveys and monitoring requirements outlined in the ESMP in the Bill of Quantities (BoQ)</p> <p>Specific design-based measures to include are:</p> <ul style="list-style-type: none"> - Animal underpasses / trenches, located at likely key crossing points; - Adapted fencing in areas with the highest bird collision risk; - Re-instatement of woodland / scrub vegetation lost to the Project; - Semi-permeable fencing; and - Noise barriers. 	<p>To ensure that the Project includes mitigation measures set out in the ESIA and required in the ESMP.</p>	<p>EBRD PR1. EBRD PR3.</p>	<p>AYGM PIU to monitor Contractor.</p> <p>Contractor to included measures in the ESIA and ESMP (when preparing the final design).</p> <p>Approval by Lenders.</p>	<p>Prior to construction.</p>	<p>All mitigation measures included in the BoQ and final design.</p> <p>Reported in the Monthly EHSS Report</p>	
<p>1.9</p>	<p>Implement the ESIA, ESMP and associated mitigations within the Halkali-Ispartakule section and apply the DCMP to any design changes.</p>	<p>To ensure that the risks and impacts of this section are addressed.</p>	<p>EBRD PR1.</p>	<p>Construction:</p> <ul style="list-style-type: none"> - AYGM PIU - Contractor <p>Operation:</p>	<p>Throughout (pre-construction, construction and during operation).</p>	<p>During construction, monthly reports to Lenders include update on implementation of ESIA, ESMP and management of E&S</p>	

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				- TCDD and TCDD Transport		impacts and risks for this section. Operations phase ESMP developed and implemented including this section.	
1.10	Update the ESAP prior to operations to further define actions in detail	Management of EHSS impacts of the Project.	EBRD PR1.	AYGM PIU.	Prior to handover to operations	ESAP updated and agreed with Lenders	
1.11	Adopt and implement the Project ESMS, during operation. Elaborate the ESMP to prepare and implement the OESMP. Prepare Annual EHSS reports.	Compliance with EBRD Performance Requirements (PRs)	EBRD PR1 to PR10 (excluding PR7 and PR9).	TCDD and TCDD Transport.	During operation.	ESMS implemented during operation. OESMP developed and implemented. Submission of annual Project progress report to the Lenders that reports on effective EHSS performance.	
PR2	Labour and Working Conditions						
2.1	Develop Human Resources (HR) policies and procedures to ensure that rights of employees are protected in accordance with national policy, applicable ILO standards and PR2. HR documents and procedures to cover all the issues associated with minimum wage, working hours, paid overtime, equality and non-discrimination, employees' grievances, working condition, access to resources, freedom of collective bargaining, .	Employee awareness about their rights. Reduced risks associated with labour and grievances of direct employees.	EBRD PR2.	AYGM, TCDD and TCDD Transport to prepare and implement HR policy and procedures, Discrimination and Harassment Policy and a stand-alone Gender Equality and GBVH Action Plan	AYGM and Contractor to prepare pre-construction and implement pre-construction and during construction. TCDD Transport to prepare prior to operation and implement during operation.	HR policy and procedures are developed and all employees are given access to them. Regular monthly inspections and audits are conducted. Worker Grievance Mechanism is established and maintained.	

	<p>Develop a Discrimination and Harassment Policy and a stand-alone Gender Equality and GBVH Action Plan</p> <p>Ensure tender documents require the Contractor to align their HR policy and procedures, Discrimination and Harassment Policy, Gender Equality and GBVH Plans, with AYGM's policies</p>						
2.2	<p>Undertake the tender process for the construction works to identify and select a Contractor who has the required EHSS performance standards, resources, accidents statistics, management systems and policies.</p> <p>Include in tendering documents the requirement for the Contractor to develop procedures / method statements for the project to manage the EHSS issues as set out in the CMP.</p> <p>As part of the selection process, an assessment of EHSS management policies, procedures and management capacities and previous performance should be undertaken.</p> <p>Include in tendering documents the requirement for the Contractor to consider whether the micro-routing outlined in the RAP can be implemented to reduce the</p>	<p>Contractor / EHSS management including non-employee workers.</p>	<p>EBRD PR1. EBRD PR2. EBRD PR4. Best Practice</p>	<p>AYGM to undertake construction works tender process</p> <p>AYGM to require the Contractor to provide the following resources, but not limited to these, to implement the EHSS requirements for the Project:</p> <ul style="list-style-type: none"> - Contractor Project Manager - Environmental Lead - Ecological Clerk of Works (ECoWs) - Health and Safety Lead - Human Resources Lead. - Land and Permits Officer - Social Lead - Railway Safety Manager 	<p>During contractor selection process (tender).</p>	<p>Requirements set out in tender and contract documentation.</p>	

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	number of people who will be affected by expropriation.			<ul style="list-style-type: none"> - Community Liaison Officers (CLOs) - Qualified Archaeological Specialist. <p>Additional specialist resources will be appointed by the Contractor and include;</p> <ul style="list-style-type: none"> - Independent Structural Surveyor - Independent Safety Assessor / Assessment Body - Notified Bodies 			
2.3	Monitor suppliers and ensure clauses on minimum age, forced labour, and health and safety are included in procurement documents.	<p>Reduced risks associated with labour and grievances of non-employee workers.</p> <p>Supply chain management of non-employee workers</p>	EBRD PR2.	<p>AYGM to require of the Contractor and Supervision Consultant (construction).</p> <p>TCDD and TCDD Transport (operation).</p>	Pre-construction, construction and operation.	Regular monthly inspections and audits (procurement).	
2.4	Monitor Contractors labour performance including the following aspects: working hours, health, wellbeing, working condition, child and forced labour, and labour concerns and grievances.	Reduced risk associated with labour dispute and grievances.	EBRD PR2.	<p>AYGM to require of the contractor and Supervision Consultant (construction).</p> <p>TCDD and TCDD Transport (operation).</p>	Pre-construction, construction and operation.	<p>Supervision Consultant to undertake monthly labour inspections and audit of Contractors labour performance.</p> <p>Contractor to implement a Construction Workers Code of Conduct</p>	

	<p>Contractor to implement the Workers Grievance Mechanism as per the CMP.</p> <p>Contractor to develop and implement a Construction Workers Code of Conduct, as per the CMP.</p>					<p>Contractor to implement the workers grievance mechanism during construction.</p> <p>Report on any worker grievances to the Lenders via monthly EHSS reports (construction) and annual EHSS report (operation).</p>	
PR3	Resource Efficiency and Pollution Prevention and Control						
3.1	<p>Update the noise modelling for the Project to ensure mitigation measures for noise effects are optimised during the detailed design of the Project.</p>	<p>Minimise adverse environmental effects of the Project.</p>	<p>EBRD PR3. Good practice</p>	<p>AYGM to require the Contractor to update noise modelling.</p> <p>Contractor to utilise modelling outcomes to optimise benefits from mitigation measures.</p>	<p>Finalisation of the design.</p>	<p>Noise mitigation measures included in detailed design.</p>	
3.2	<p>Identify how reduction of Greenhouse Gasses (GHG), and any emissions benefits, has been achieved through detailed design measures and material selection.</p>	<p>Minimise adverse environmental effects of the Project.</p>	<p>EBRD PR3.</p>	<p>AYGM to require the Contractor to calculate emissions resulting from the final detailed design, including the materials selected for the Project.</p>	<p>Finalisation of the design.</p>	<p>Emission benefits identified for finalised detailed design).</p>	
PR4	Health and Safety						
4.1	<p>Develop Health, Safety and Security Plans (including Occupational Health and Safety) compliant with national legislation and PR4 with monitoring and management systems, as required in the ESMP.</p>	<p>To minimise accidents and incidents and ensure safety of workers and equipment.</p>	<p>EBRD PR4.</p>	<p>AYGM to require the Contractors to develop a Construction Health, Safety and Security Plan.</p> <p>TCDD and TCDD Transport responsible for developing an Operational</p>	<p>Contractor prior to Construction.</p> <p>TCDD and TCDD Transport prior to operation.</p>	<p>Management plans developed and implemented.</p>	

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				Health, Safety and Security Plan.			
4.2	Appoint an Independent Safety Assessor/Assessment Body (ISA/AsBo) to consult with TCDD to agree the approach to construction works near the railway, including temporary and permanent crossings.	Safety concerns associated with construction workers, working on, over and adjacent to the existing railway line.	EBRD PR2. EBRD PR4. EU Directive on Road Infrastructure Safety Management (2008/96/EC).	AYGM to require the Contractor / Supervision Consultant responsible for appointment of ISA/AsBo.	Prior to construction.	Method statement for the construction of Temporary and Permanent Rail Crossings approved by the Safety Consultant, Rail Operator and Lenders Technical Advisor. No accidents associated with railway line. Reported in the monthly EHSS reports to the Lenders.	
4.3	Implement safety management measures including the following; - Hazard Log - Rail Safety Plan - Appointment of a Notified Body (NoBo) and Independent Safety Assessor/Assessment Body (ISA/AsBo)	Mitigate rail safety risks.	EBRD PR4. Best Practice	Responsibilities for each of the following as defined in the Rail Safety Plan: - AYGM / PIU; - Supervision Consultant; and - Contractor - TCDD / TCDD Transport / DGTSR (Directorate General of Transport Services)	During detailed design and continuing throughout the Project.	A Hazard Log is produced which complies with the EU CSM-RA process. The Contractor uses this to demonstrate how rail safety hazards are being managed. A Safety Plan is produced and implemented, mandating the Contractor's activities needed in order to manage safety according to the CSM-RA. A NoBo is employed and verifies compliance with the TSIs. An Independent Safety Assessor/Assessment	

						<p>Body (ISA/AsBo) is employed and verifies compliance with the CSM-RA.</p> <p>An Operational Safety Case is prepared by TCDD.</p>	
PR5	Land Acquisition, Involuntary Resettlement and Economic Displacement						
5.1	Ensure that mitigation measures outlined in the Resettlement Action Plan (RAP) are implemented, to compensate affected parties.	Minimise and mitigate effects on parties who could be affected by resettlement.	<p>National legislation.</p> <p>EBRD PR5.</p> <p>Best practice</p>	<p>AYGM PIU with support for other internal departments, as required.</p> <p>Contractor.</p>	Prior to, during and on completion of construction.	<p>RAP implemented.</p> <p>RAP related grievances are identified and addressed.</p> <p>PIU to provide regular (every 6 months) update on RAP Implementation to Lenders.</p>	
5.2	Conduct regular (every 6 months) external monitoring of the Resettlement process covering, at a minimum: progress with relevant quantitative indicators; consultation activities and summary of results; summary of grievances and unanticipated issues; livelihoods restoration activities implemented; activities to support vulnerable people; resources (including financial and others) mobilised during the period.	Ensure RAP implementation is compliant with EBRD PR5 requirements.	<p>National legislation.</p> <p>EBRD PR5.</p>	External consultant on behalf of AYGM PIU to undertake monitoring.	Prior to, during and up to completion of the RAP.	Summary of RAP monitoring with Monthly progress report to the Lenders.	
5.3	Undertake a completion audit after completion of the Resettlement Plan in order to determine whether requirements	Verify effectiveness of RAP implementation	EBRD PR5.	External consultant on behalf of AYGM PIU to undertake audit.	As per RAP Schedule.	Audit completed and any corrective actions implemented and closed.	

	of PR5 and the provisions of this plan have been met. This completion audit will be undertaken by competent resettlement professionals of an independent consultant firm apart from the one performing the RAP monitoring.	and objectives met		AYGM PIU to implement corrective actions.			
PR6	Biodiversity Conservation and Sustainable Management of Living Natural Resources						
6.1	Ensure the 2021 biodiversity survey results are used to elaborate the Biodiversity Management Plan (BMP) for approval.	Minimise and mitigate effects on biodiversity.	EBRD PR6. Best practice	AYGM PIU / Supervision Consultant to update BMP. AYGM to require the Contractor to Implement BMP during finalisation of the design, pre-construction and construction. TDDD and TCDD Transport to implement BMP during operation.	Pre-construction.	BMP updated prior to construction and prior to operation and submitted to Lenders for no objection. BMP implemented during construction and operation.	
PR8	Cultural Heritage						
8.1	Implement the Cultural Heritage Management Plan (CHMP), as required in the ESMP. This includes the development of a Chance Find Procedure. This will be prepared and implemented by the Contractors Qualified Archaeological Specialist and monitored by the Supervision Consultant's Archaeological Supervisor.	Minimise adverse cultural heritage effects.	EU EIA Directive. EBRD PR8. Best practice	AYGM to require the Contractor to prepare and implement. Supervision Consultant to monitor.	Pre-construction and construction.	Implementation of mitigation measures outlined in the ESMP.	
PR10	Information Disclosure and Stakeholder Engagement						

<p>10.1</p>	<p>Implement the SEP, including the Project-level grievance mechanism.</p> <p>The SEP should be reviewed and if necessary updated annually or when changes occur in the Project. It will be updated prior to operation.</p>	<p>Information dissemination and continuous engagement with affected stakeholders.</p>	<p>EBRD PR10.</p>	<p>Pre-construction and construction:</p> <ul style="list-style-type: none"> - PIU and Contractor to implement (with key roles for Community Liaison Officers). - Supervision Consultant to monitor. <p>Operation:</p> <ul style="list-style-type: none"> - TCDD and TCDD Transport to implement. 	<p>Pre-construction, construction and operation.</p>	<p>Implement the SEP.</p> <p>Implement the Project-level grievance mechanism.</p> <p>Report to the Lenders in monthly progress reports on the stakeholder engagement process and any grievances.</p>	
<p>Gender SMART: Gender-specific activities</p>							
<p>GS.1</p>	<p>AYGM to join the EBRD's capacity building programme on addressing GBVH-related risks in Turkey.</p> <p>As a contributor to this work, AYGM will participate in discussions with EBRD and the selected expert consultants to inform the development of a set of best practices and policies on GBVH prevention and mitigation for the private sector in Turkey. In particular, AYGM will contribute with their sectoral knowledge on infrastructure and transport, and also participate in relevant training activities under the programme.</p>	<p>Equal access to employment and skills.</p> <p>Equal access to services.</p>	<p>EBRD PR2.</p> <p>Joint CDC, EBRD, IFC Good Practice Note on Addressing Gender-Based Violence and Harassment (2020).</p> <p>Best Practice</p>	<p>AYGM (resources for programme participation).</p> <p>EBRD (resources for programme design and delivery).</p>	<p>Upon launch of relevant activities under the EBRD capacity building programme; full commitment to be achieved by 31/05/2022 (AYGM to join programme) and 15/07/2023 (AYGM staff to participate in training).</p>	<p>Proof of implementation / contribution to programme activities (e.g. input provided to transport sector guidance document); disclosure of relevant information to ascertain the total number of staff members trained on GBVH-related risks under the EBRD capacity building programme.</p>	

<p>GS.2</p>	<p>AYGM to implement new outreach activities targeting female students in engineering degrees to attract them to their internship programme; outreach activities will specifically cover relevant universities in the Project region.</p> <p>AYGM to submit appropriate requests to Presidential internship mechanism to ensure significant participation of female students from engineering degrees in their internship programme.</p> <p>AYGM to further formalise and strengthen their internal internship programme to provide quality learning to female students.</p>	<p>Equal access to employment and skills.</p>	<p>EBRD PR2. Best Practice</p>	<p>AYGM (resources for programme design and delivery), supported by EBRD-funded Gender Expert from PIU support team.</p>	<p>Pre-construction and construction; full commitment to be achieved by 31/12/2026 (at least 50 young women from engineering degrees to benefit from internship programme).</p>	<p>Proof of implementation; disclosure of relevant information to ascertain that at least 50 young women from engineering degrees have benefitted from internship opportunities under the Project.</p>	
<p>GS.3</p>	<p>Contractors to develop and implement career development programmes for women in construction, such as mentoring programmes, STEM workshops, and collaboration with local schools on apprenticeships and graduate programmes; activities may be carried out in collaboration with existing initiatives such as Engineer Girls of Turkey or similar.</p> <p>AYGM to facilitate this engagement (including through clarification of relevant requirements during tender) and build contractor capacity to deliver quality career development</p>	<p>Equal access to employment and skills.</p>	<p>EBRD PR2. Best Practice</p>	<p>Contractor (resources for programme design and delivery), supported by EBRD-funded Gender Expert from PIU support team.</p> <p>AYGM (resources for tender integration, facilitation and capacity building of contractors), supported by EBRD-funded Gender Expert from PIU support team.</p>	<p>During contractor selection process (tender) and during construction; full commitment to be achieved by 31/12/2025 (contractors to have implemented relevant initiatives).</p>	<p>Proof of implementation; disclosure of relevant information to ascertain the total number of women that have benefitted from career development opportunities in construction under the Project.</p>	

	programmes for women in construction.						
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*Note: All documents referenced in the ESAP should be provided to the Lenders or Lenders E&S Consultant for information, and non-objection, if requested, once developed and when updated.