

13.2 Environmental and Social Action Plan

Table 13-3 provides the Environmental and Social Action Plan (ESAP) outlines the specific actions, responsibilities, and timelines required to address the environmental, social, labor, health, and safety risks identified during the ESDD. The ESAP aims to ensure that the project complies with the Applicable Standards and mitigates any adverse impacts on the environment and local communities. The ESAP has been structured based on the IFC PS but does consider all Applicable Standards. The ESAP incorporates all of the recommendations included in Chapter 4 to Chapter 12, to integrate these into the ESAP they have been rationalized and summarized with clear indicators of completion identified.

Table 13-3 Project Dakini ESAP

No #	Issue	Action	Timeframe for Completion	Responsible Party	Indicator of Completion	Status
Legal and regulatory compliance						
1	Compliance with permitting requirements	Provide a copy of the MOE's formal approval of the local ESIA before DFC finalizes the loan agreement, otherwise consider obtaining written clarification of the Project's approval form the Ministry	Construction	CAIC	Evidence of MOE Formal Approval	Open
		Provide a copy of the construction certificate from the Ministry of Land Management, Urban Planning and Construction	Construction	CAIC	Copy of construction certificate from the Ministry	Open
2	Compliance with authorization requirements	Provide a copy of the pollutant emission authorization or otherwise demonstrate why one was not required during construction prior to finalizing the loan agreement. Where relevant, also provide evidence how it has complied with any conditions attached to the authorization and confirm if an authorization will be required to operate the site and either provide a copy or demonstrate when it will be obtained.	Construction	CAIC	Copy of pollutant emission authorization for construction Evidence of compliance with conditions Confirmation of authorization requirements for construction	Open
		Provide a copy of the wastewater discharge authorization or otherwise demonstrate why one was not required during construction prior to finalizing the loan agreement. Where relevant, also provide evidence how it has complied with any conditions attached to the authorization and confirm if an authorization will be required to operate the site and either provide a copy or demonstrate when it will be obtained.	Construction	CAIC	Copy of wastewater discharge authorization for construction Evidence of compliance with conditions Confirmation of authorization requirements for construction	Open

No #	Issue	Action	Timeframe for Completion	Responsible Party	Indicator of Completion	Status
PS1: Assessment & Management of E&S Risks and Impacts						
3	Responsible party for managing E&S risks and impacts	<p>Employ a or allocate suitably qualified individual responsible for environmental and social management for the remainder of construction period and the forward operational phase. This individual will be accountable for implementing the EMP/ESMP, while reporting to the Ministry and managing the responsible institutions.</p> <p>This individual will be accountable for:</p> <ul style="list-style-type: none"> Establishing and enforcing clear monitoring protocols for environmental and social impacts, ensuring compliance with the Applicable Standards. Maintaining proper documentation of all monitoring activities and ensuring timely reporting to relevant government agencies and stakeholders. Implementing a structured schedule for reporting environmental and social performance, ensuring compliance with the regulatory requirements. Highlighting compliance measures, incident responses, and corrective actions in periodic reports to demonstrate transparency and accountability. 	Construction and operation	CAIC	<p>Employment or nomination of suitably qualified E&S manager and list of roles and responsibilities</p> <p>CV provided to demonstrate relevant experience of nominated person</p> <p>Updated organizational structure showing integration of E&S manager into CAIC team</p>	Open
		CAIC E&S Manager to undertake proactive engagement with the monitoring institutions every six months to confirm if they have carried out any independent monitoring.	Operation	CAIC	<p>Evidence of correspondence with monitoring institutions</p> <p>Independent monitoring reports and evidence of any corrective actions undertaken</p>	Open
4	Assessment of ancillary infrastructure	Undertake supplementary environmental assessments (or update the Addendum ESIA) to reflect potential impacts and mitigation measures required for ancillary infrastructure.	Pre-operation	CAIC	Supplementary assessments for ancillary infrastructure	Open
5	Recording EMP/ESMP activities	Develop, implement, maintain, annually audit and report records of all EMP/ESMP activities through a reporting system. This includes environmental monitoring, social engagement, and compliance inspections.	Construction and operation	CAIC	<p>Annual audit reports of EMP/ESMP activities</p> <p>Evidence of corrective actions</p>	Open
6	Internal inspection records,	Schedule and document routine annual internal inspections to adhere to environmental and social standards and	Construction and operation	CAIC and subcontractors	Annual internal inspection reports	Open

No #	Issue	Action	Timeframe for Completion	Responsible Party	Indicator of Completion	Status
	performance audits and reviews	requirements of the local ESIA/ Addendum ESIA. Recommendations and corrective actions will be implemented within three months of the audit date.			Evidence of completion of corrective actions (with dates)	
7	Independent external inspection records, performance audits and reviews	Engage independent third-party auditors to carry out performance assessments, ensuring unbiased evaluations and identifying areas for improvement. These audits will take place once every two years, increasing to once every year in the event of non-conformances. The findings of the independent audits will be made publicly available and recommendations and corrective actions implemented within three months of the audit date.	Construction and operation	Independent auditor	Evidence of engagement of third-party auditor (e.g. contract document)	Open
8	Statutory requirement to report biannually.	Maintain and publish reports on environmental and social performance every six months in line with the Ministerial requirement, making them accessible to stakeholders, regulatory bodies, and the public.	Construction and operation	CAIC	Semi-annual environmental and social performance reports Evidence of provision of reports to stakeholders	Open
PS2: Labor and working conditions						
9	Health and safety incident management	Compile a comprehensive database of occupational H&S incidents that have occurred during construction. The database should describe the date the incident occurred, the nature of the incident, any associated injuries or fatalities and evidence of actions undertaken to identify and address the root cause of these incidents, share findings and any reporting required to labor authorities and management	Construction	CAIC and subcontractors	Database of H&S incidents and accidents for the construction phase Evidence of corrective actions undertaken following incidents Copies of any incident reports shared with labor authorities and/or management	Open
10	Local content and influx management plan	Implement a local content and influx management plan, which is integrated into the operational recruitment process with clear hiring preferences for indigenous and local community members.	Pre-Operation	CAIC	Provision of local context and influx management plan for operation	Open
11	Work health and safety alignment to IFC PS2	Revise and implement a safety management plan to comply with IFC PS2 to cover the required worker health and safety provisions and requirement for regular performance reviews.	Construction and Operation	CAIC and subcontractors	Safety management plan for construction Evidence of circulation of safety management plan to all workers	Open
12	Health and safety	Develop an operation-stage health and safety plan to include operational specific risk level assessments including but not	Operation	CAIC and subcontractors	Operational H&S management plan for all workers	Open

No #	Issue	Action	Timeframe for Completion	Responsible Party	Indicator of Completion	Status
		related to hazardous materials use associated with airport operations, working in proximity to aircraft (including health impacts associated with air and noise pollution), engagement with passengers, customs and baggage management, working with multiple aircraft operators to ensure alignment with IFC PS2 in relation to occupational health and safety requirements			Evidence of circulation and training on Operational H&S management plan	
13	Employee grievance procedure	Develop, implement, and monitor a formalized, accessible, and confidential employee grievance procedure. The procedure needs to offer fair, transparent and independent resolution of worker complaints, including protections against retaliation. The procedure also needs to clearly show equity all employees, including subcontractors and suppliers, by including a mechanism that support unfiltered escalation through to CAIC as needed	Pre-operation Operation	CAIC and subcontractors	Employee grievance procedure Evidence of circulation and training on Employee Grievance Procedure Employee grievance records including corrective actions	Open
14	Health impacts	Assessment of operational phase health-related impacts to ensure long-term worker and community risks and identification of management measures. Repeat assessment one-year post operation to validate the assessment whilst also implementing corrective actions.	Pre-Operation Operation	CAIC	Pre-operational assessment of operational phase impacts and identification of management measures Updated assessment completed one-year post-operation Evidence of implementation of management measures and any relevant monitoring	Open
15	Operational recruitment policy	Develop, implement, and monitoring an operational recruitment policy to formalize employment provisions for women, direct/contract/supply-chain workers, and retrenchment measures post-construction. The policy should explicitly include provisions to prevent child labor and forced labor, detailing monitoring and enforcement measures.	Operation	CAIC	Operational recruitment policy Evidence of implementation of operational recruitment policy	Open
16	Provision of PPE and incineration of waste	Provision of adequate face and eye protection (i.e., heat-resistant face shield, safety goggles (ANSI Z87.1-rated), half-mask or full-face respirators with filters, heat and chemical resistant gloves, earplug or mufflers, steel toe-	Construction	CAIC	Evidence of weekly personal protective equipment inspections Construction safety management plan/procedures updated to	Open

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		capped or composite-toe boots (appreciating that some of this equipment was being used onsite) where any waste incineration is occurring. Finally, make sure there are weekly personal protective equipment inspections, and a clear fire management plan and equipment in place. Linked to Ref-17.			incorporate emergency measures for incineration of waste Audits completed to confirm presence of fire management equipment	
IFC PS3: Resource Efficiency and Pollution Prevention						
17	Waste materials	Implement the recommendations of the local ESIA and Addendum ESIA and the waste and sanitation and management plan to apply clear waste storage, segregation, auditing, transportation, management and disposal to licensed providers and phase out the incineration of waste. Efforts should also be made to prepare waste audit data to quantify the waste generation associated with the remaining construction and to establish a waste audit framework for operation.	Construction Pre-operation	CAIC	Evidence of appropriate waste segregation and storage on site Waste audit report for construction	Open
		Develop a waste management plan for operation that covers solid waste and hazardous waste management processes.	Operation	CAIC	Operation waste management plan Evidence of waste audits for operation Evidence of regular inspections of waste management and other measures included in the waste management plan	Open
18	Hazardous materials management	Implement the recommendations of the local ESIA and Addendum ESIA and hazardous substance handing plan, implementing appropriate practices for managing hazardous waste for the remainder of construction specifically in phasing out incineration of waste, providing appropriate training to workers still on site, disposal to licensed authorities and auditing of hazardous waste generation.	Construction Pre-Operation	CAIC	Evidence of hazardous waste audits and appropriate storage practices Evidence of disposal of hazardous waste to licensed contractors throughout construction	Open
		Incorporate management of hazardous waste into the operational management plan (See Ref-18). Incorporate management of hazardous materials into the operational H&S management plan (See Ref-12)	Operation	CAIC	Completion of Ref-18 and Ref-12	Open

No #	Issue	Action	Timeframe for Completion	Responsible Party	Indicator of Completion	Status
19	Emergency response planning	Documentation of any spillage or other emergency incidents for the remaining construction period.	Construction	CAIC	Spill/emergency incident reports provided for remaining construction period	Open
		Prior to operation, undertake emergency response drills and liaise with provincial emergency teams to establish a clear Emergency Response Plan for operation.	Pre-operation	CAIC	Evidence of drills undertaken with provincial emergency teams Operational stage Emergency Response Plan	Open
20	Ambient air, noise, water, light, and soil conditions	Undertake post-construction/pre-operational monitoring of ambient air, noise, water, light, and soil conditions to set the environmental baseline condition at key receiver locations surrounding the site.	Pre-operation	CAIC	Monitoring reports for ambient air, noise, water, light and soil	Open
21	Water consumption	Undertake an assessment to quantify water availability in comparison to water supply and identify any additional required to address potential shortfall	Pre-operation	CAIC	Water supply assessment report for operation	Open
		Undertake monitoring of water consumption and identify targets and reduction measures for consumption that are reviewed on an annual basis.	Operation	CAIC	Water consumption targets established. Water consumption monitoring	
22	Greenhouse gas emissions and energy consumption	Undertake a GHG emissions assessment for the airport operations that is alignment with the requirements of the Applicable Standards and identify measures to reduce energy consumption.	Pre-operation	CAIC	GHG emissions assessment for operation	Open
		During operation, establish a process for monitoring energy consumption and identify targets and reduction measures for consumption.	Operation	CAIC	Energy consumption targets established Energy consumption monitoring Evidence of implementation of energy reduction measures	Open
IFC PS4: Community Health, Safety and Security						
23	Health and Safety incident records	Compile a comprehensive database of any community H&S incidents that have occurred during construction including those associated with construction traffic and noise/air quality emissions. The database should describe the date the incident occurred, the nature of the incident, any associated injuries or fatalities and evidence of actions undertaken to	Construction	CAIC	Database of H&S incidents for the construction stage	Open

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		identify and address the root cause of these incidents, any compensation provided to community members and evidence of reporting on the response to project parties, government departments and community representatives as appropriate.				
		Conduct periodic third-party audits and independent verification assessments to monitor implementation of the community H&S management plan and ensure continuous improvement in community health, safety, and security management.	Operation	CAIC	Independent verification reports (completed annually at a minimum)	Open
24	Community H&S management	Prepare and implement a community H&S management plan for the operation phase identifying and assessing risks associated with aircraft operations (including health risks associated with air quality and noise) as well as management of potential access to the site and outlining how these will be managed and monitored and interface with the community.	Pre-operation	CAIC	Operational stage community H&S management plan	Open
25	Community grievances	Compile a database of all community grievances raised during construction. The database should describe the grievances, the date they were raised, the actions taken by the Project to address the grievances and evidence of how the response was shared with community members. It should also identify any outstanding grievances that need to be resolved prior to operation. Update the grievance procedure for operation and maintain the grievance database	Construction to Operation	CAIC	Grievance database updated for construction Identification of any outstanding grievances for construction Updated grievance procedure for operation Grievance database maintained for operation	Open
26	Community perspectives on the project	Undertake an independent assessment of community perspectives on the Project to validate whether the positive sentiment towards the Project expressed during the site audit extends beyond the nominated community representatives (in absence of project management).	Pre-operation	CAIC	Independent assessment report on community perspectives Evidence of implementation of any recommended corrective actions	Open
27	Stakeholder Engagement Plan	Prepare and implementation of a Stakeholder Engagement Plan (SEP) to ensure that effective communication channels with local stakeholders are put in place to address any issues which might arise during the remainder of construction and operation phases of the Project and establish appropriate	Pre-operation	CAIC	Stakeholder Engagement Plan for operational stage	

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		protocols for ongoing communication with local stakeholders.				
		Provide evidence of engagement with local communities to provide transparent updates on the Project's status, activities, and expected impacts. This could include a bi-annual community engagement and awareness campaign to ensure understanding of rights and the grievance mechanism.	Operation	CAIC	Records of engagement with local communities	Open
28	Security personnel training	Develop and undertake training for all security personnel that aligns with IFC PS4 requirements, covering the appropriate use of weapons and force, references the relevant human rights standards (e.g. Voluntary Principles on Security and Human Rights), GBVH risk and grievance management. Undertake a review to identify any potential grievances raised by the community in relation to security personnel and address these appropriately prior to operation	Construction to Operation	CAIC	Training materials for security personnel Training records for security personnel engaged for remainder of construction and operation Grievance database for construction showing presence (or absence) of grievances related to security personnel	Open
IFC PS5: Land Acquisition and Involuntary Resettlement						
29	Land acquisition	Provide evidence that final and fair compensation has been paid to all stakeholders affected by land acquisition because of the Project in line with international and national standards	Construction Pre-operation	CAIC Ministry of Land Management, Urban Planning, and Construction	Independently verified written statement from the Ministry of Land Management, Urban Planning, and Construction prior to securing the loan, which confirms the final compensation provided by CAIC Statement from Ministry confirming the agreed method for determining compensation rates, showing alignment with rural region averages	Open
		Provide a report describing any additional land acquisition requirements for ancillary infrastructure outlining how these will be identified, valued, compensated and any stakeholder engagement undertaken in relation to this process.	Construction Pre-operation	CAIC	Report outlining any additional land acquisition requirements, value and compensation approach and stakeholder engagement plan Evidence of completed payments	Open

No #	Issue	Action	Timeframe for Completion	Responsible Party	Indicator of Completion	Status
					Records of stakeholder engagement	
		Undertake an independent completion audit (recommended within the first 5 years of operation) to assess and verify that all land acquisition and livelihood restoration requirements have been undertaken in line with national and international standards.	Operation	CAIC	Independent completion audit report	Open
30	Livelihood restoration	Develop, implement, monitor, and audit a livelihood restoration program for (the remainder of the) construction and operational phases to offer longer-term sustainable income opportunities beyond the one-off payments.	Construction to Operation	CAIC	Livelihood restoration program (covering remainder of construction and operation)	Open
		Develop, implement, monitor, and audit a structured post-resettlement and restoration monitoring program to track the well-being of displaced individuals and income of any affected businesses.	Operation	CAIC	Post-resettlement and restoration monitoring framework Records of monitoring against the framework	Open
		Undertake annual independent audit of livelihood restoration activities to identify any required corrective actions and track progress.	Operation	CAIC	Annual independent reports on livelihood restoration	Open
IFC PS6: Biodiversity conservation and sustainable management of living natural resources						
31	Biodiversity Action Plan	Update the Preliminary BAP in the Addendum ESIA for implementation during operation and monitor compliance with the updated BAP (see Ref-32).	Pre-Operation Operation	CAIC	Updated BAP See Ref-32 for monitoring	Open
32	Biodiversity monitoring	Conduct post-construction biodiversity surveys to understand impacts of relocation/displacement of species following construction and to quantify any impacts on habitat conditions focusing on critical IUCN habitats.	Pre-Operation	CAIC	Post-construction biodiversity survey records	Open
		Establish a comprehensive monitoring framework for the operational stage, outlining requirements for audits and monitoring of target species.	Pre-operation	CAIC	Monitoring framework for operational stage	Open
		Maintain quarterly site audits and biannual monitoring over a minimum of 3 to 5 years to capture seasonal variations and assess species shifts, habitat changes, and the effectiveness of restored or newly established habitats in supporting	Operation	CAIC	Records of quarterly site and biannual biodiversity monitoring	Open

No #	Issue	Action	Timeframe for Completion	Responsible Party	Indicator of Completion	Status
		biodiversity conservation targets, as outlined in the Preliminary BAP.				
33	Not net loss and net gain	Outline a clear process for identifying suitable locations for achieving no net loss and net gain using IFC-aligned biodiversity offset approaches.	Pre-operation	CAIC	Written process for identifying suitable locations for achieving no net loss and net again	Open
		Establish clear metrics for assessing progress and achievement of no net loss and net gain in Critical Habitat including post-relocation tracking to assess success of species displacement. See Ref-32 for biodiversity monitoring.	Pre-operation	CAIC	Metrics for assessing progress and achievement of no net loss and net gain incorporated into operational monitoring framework (see Ref-32)	Open
34	Ecosystem services	Undertake an assessment of the Project impacts on ecosystem services, identify any further relevant mitigation and enhancement opportunities such as wildlife corridors, controlled lighting, and habitat restoration, to reduce impacts on target species.	Construction to Operation	CAIC	Ecosystem services assessment Incorporation of metrics for ecosystem services incorporated into operational monitoring framework (see Ref-32)	Open
35	Hydrological restoration	Develop a phased hydrological restoration plan aligned with Tonle Sap flood pulse cycles and Ministry of Environment guidelines, using nature-based solutions for wetland recovery and informed by local ESIA, Addendum ESIA and post-construction survey data.	Pre-operation	CAIC	Hydrological restoration plan for operation	Open
IFC PS8: Cultural Heritage						
36	Heritage impacts on the Preah Ream Potsar Pagoda	Carry out a specific heritage impact assessment on the Preah Ream Potsar Pagoda to account for other associated construction and operational impacts including, air quality, amenity, or impacts to the site's locality, setting, and/or spiritual significance.	Pre-operation	CAIC	Heritage impact assessment for Preah Ream Potsar Pagoda Evidence of implementation of any immediate mitigation measures	
		Undertake annual reviews of the implementation of any measures included in the heritage impact assessment for the next five years. Implement any recommendations or corrective actions within three months of the audit.	Operation (annual for five years)	CAIC	Records of annual reviews Evidence of implementation of recommendations or corrective actions (within three months of the audit)	