



SYRIAN MINISTRY OF ENERGY

PUBLIC ESTABLISHMENT FOR TRANSMISSION AND
DISTRIBUTION OF ELECTRICITY (PETDE)

SYRIA EMERGENCY ELECTRICITY PROJECT (SEEP)

Annex C- Occupational Health and Safety Plan (OHS Plan)

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LIST OF ACRONYMS & GLOSSARY

Acronym	Full Term	Brief Description
CESMP	Construction Environmental and Social Management Plan	Contractor's project-specific ESMP for the construction phase.
CoC	Code of Conduct	Document setting behavioral standards for workers, including prohibitions on GBV/SEA/SH.
E&S	Environmental and Social	Shorthand for combined environmental and social aspects/risks.
EHS	Environment, Health and Safety	Integrated management of environmental, occupational health and safety issues.
EPC	Engineering, Procurement and Construction	Turnkey contractor responsible for design and construction.
ERP	Emergency Response Plan	Plan defining procedures, roles and resources for responding to emergencies.
ESCP	Environmental and Social Commitment Plan	Time-bound E&S commitments agreed between PETDE/GoS and the World Bank.
ESF	Environmental and Social Framework	World Bank's overarching framework comprising ESS1-ESS10.
ESIA	Environmental and Social Impact Assessment	Assessment of project E&S risks and impacts and identification of mitigation.
ESMIP	Environmental and Social Management Implementation Plan	ESIA chapter describing how ESMPs are organized, resourced and monitored.
ESMP	Environmental and Social Management Plan	Plan defining mitigation, monitoring and institutional measures for E&S risks.
ESS	Environmental and Social Standard	The ten standards under the ESF (ESS1-ESS10).
GBV	Gender-Based Violence	Umbrella term including SEA and SH, addressed via CoCs, training and GMs.
GBV/SEA/SH	Gender-Based Violence / Sexual Exploitation and Abuse / Sexual Harassment	Combined reference to GBV risks associated with project workers, contractors and security.
GM	Grievance Mechanism	System for receiving, recording and resolving complaints from workers and communities.

HIRA	Hazard Identification and Risk Assessment	Structured process to identify hazards, assess risks and define controls.
HSE	Health, Safety and Environment	Common term for integrated management of health, safety and environmental issues.
ILO	International Labour Organization	UN agency setting international labor standards and OHS conventions.
JSA	Job Safety Analysis	Task-level tool breaking down a job into steps, identifying hazards and controls.
KPI	Key Performance Indicator	Quantitative indicator used to track ESMP and OHS performance and compliance.
LMP	Labor Management Procedures	ESS2 document defining labor terms, worker GM and OHS commitments.
LOTO	Lockout–Tagout	Procedure to ensure equipment is isolated and cannot be energized while work is carried out.
MSDS	Material Safety Data Sheet	Manufacturer document providing safety and handling information for chemicals.
O&M	Operation and Maintenance	Routine operation, inspection and maintenance of OHTLs and substations.
OESMP	Operational Environmental and Social Management Plan	ESMP covering the operation and maintenance phase.
OHS	Occupational Health and Safety	Management of worker health and safety risks under ESS2.
OHTL	Overhead Transmission Line	High-voltage line on towers, typically within an existing right-of-way.
OE	Owner's Engineer	Supervision consultant supporting PETDE/PMT in technical and E&S oversight.
PETDE	Public Establishment for Transmission and Distribution of Electricity	SEEP implementing agency responsible for transmission and distribution assets.
PMT	Project Management Team	PETDE team responsible for day-to-day SEEP implementation and oversight.
PPE	Personal Protective Equipment	Protective clothing and equipment provided to workers to reduce exposure to hazards.
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment	Forms of GBV addressed through CoCs, training and survivor-centered GMs.
SEEP	Syria Electricity Emergency Project	World Bank–financed project supporting grid rehabilitation.
SEP	Stakeholder Engagement Plan	ESS10 plan defining engagement, disclosure and grievance mechanisms.
SF₆	Sulphur Hexafluoride	High-dielectric gas used in high-voltage equipment; potent greenhouse gas requiring controlled handling.
T&D	Transmission and Distribution	Segment of the power system covering bulk transmission and distribution networks.
UXO	Unexploded Ordnance	Munitions that failed to detonate and remain hazardous.
UXO/ERW	Unexploded Ordnance / Explosive Remnants of War	Combined reference to UXO and other explosive remnants from past conflict.

WHO	World Health Organization	UN agency providing guidance on public and occupational health.
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1. PURPOSE, SCOPE, AND OBJECTIVES

1.1 PURPOSE

This Occupational Health and Safety Plan (OHS Plan) template sets out the minimum requirements for managing occupational health and safety (OHS) risks under the Syria Electricity Emergency Project (SEEP). It operationalizes the OHS commitments set out in the SEEP ESIA (including the Framework ESMP / ESMIP), the Overhead Transmission Line (OHTL) Environmental and Social Management Plan (ESMP), the Substations ESMP, the Environmental and Social Commitment Plan (ESCP), the Labor Management Procedures (LMP), and the World Bank Environmental and Social Framework (especially ESS2 and ESS4), and the WBG General and Electric Power Transmission and Distribution Environment, Health and Safety (EHS) Guidelines.

Each Engineering, Procurement and Construction (EPC) Contractor shall adapt and expand this template to prepare a site-specific Construction OHS Plan as part of its Construction Environmental and Social Management Plan (CESMP). Public Establishment for Transmission and Distribution of Electricity (PETDE) shall use this template as the basis for its own Operation and Maintenance (O&M) OHS procedures for substations and OHTLs rehabilitated under SEEP.

1.2 SCOPE

This OHS Plan applies to:

- All SEEP activities for:
 - Overhead Transmission Lines (OHTLs) rehabilitation (including foundations, tower erection, stringing, reconductoring, OPGW installation, tower and line repairs).
 - Substation rehabilitation and associated civil, electrical and control works.
- All phases under SEEP where OHS risks arise:
 - Pre-construction (surveys, Unexploded Ordnance / Explosive Remnants of War (UXO/ERW) clearance and chance finds, site preparation).
 - Construction (including commissioning and energization).
 - Operation and maintenance (O&M) of rehabilitated assets.
- All categories of workers:
 - PETDE staff (Project Management Team (PMT) and O&M).
 - EPC Contractor and subcontractor workers.
 - Consultants, Owner's Engineer (OE) staff, and other project-related workers.

1.3 OBJECTIVES

The objectives of this OHS Plan are to:

- Prevent fatalities, severe injuries, and occupational illnesses.
- Systematically identify, assess, and control OHS risks, including those specific to high-voltage transmission and substations in an FCV context (UXO/ERW, security, Gender-Based Violence / Sexual Exploitation and Abuse / Sexual Harassment (GBV/SEA/SH) risks).

- Ensure compliance with:
 - Syrian OHS legal requirements.
 - World Bank Environmental and Social Framework (ESF) /ESS2 and ESS4.
 - WBG General and Transmission and Distribution (T&D) EHS Guidelines.
 - SEEP ESIA/ESMP, ESCP, LMP, SEA/SH Plan, SMP, and Stakeholder Engagement Plan (SEP).
- Promote a safety culture where workers are empowered to stop unsafe work and raise concerns through the worker Grievance Mechanism (GM) without retaliation.
- Ensure effective OHS performance monitoring, reporting, and continual improvement.

1.4 LINKAGES TO OTHER SEEP INSTRUMENTS

This OHS Plan shall be implemented in coordination with, and with explicit references to:

- ESIA / Framework ESMP (ESMIP): overall Environment and Social (E&S) risk management framework, including OHS requirements.
- OHTL ESMP and Substations ESMP: specific mitigation measures and monitoring requirements (refer to ESIA; OHTL and Substation ESMPs).
- ESCP: OHS-related actions, timelines and incident/accident reporting commitments to the World Bank.
- RPs/LRPs: ensure that works only proceed where ESS5 requirements on land access, resettlement and livelihood restoration have been implemented or appropriate interim arrangements agreed, thereby avoiding OHS and security risks linked to unresolved land and asset disputes.
- LMP: conditions of employment, worker GM, Code of Conduct (including SEA/SH provisions).
- SEP: stakeholder engagement requirements, including communication of OHS risks to communities and GM access.
- SMP: for managing security risks to personnel, coordination with security providers, and ensuring security measures are implemented in a manner consistent with OHS and human rights principles.
- SEA/SH Action Plan: for preventing and responding to Sexual Exploitation, Abuse, and Sexual Harassment in the workplace and project-affected communities, including Code of Conduct enforcement and survivor-centered grievance mechanisms.
- Other ESIA appendices: Traffic Management Plan, Hazardous/Waste Management Plan, Emergency Response Plan, ERW Chance-Finds Procedure.

2. ROLES, RESPONSIBILITIES AND ACCOUNTABILITY

2.1 GENERAL PRINCIPLES

- PETDE/PMT retains overall responsibility for ensuring SEEP compliance with the ESF, ESCP, ESIA/ESMPs and this OHS Plan.
- EPC Contractors and their subcontractors are directly responsible for OHS of their workers and third parties affected by their activities.
- The OE is responsible for OHS oversight and verification on behalf of PETDE.

- PETDE O&M departments are responsible for safe operation and maintenance of rehabilitated assets.

2.2 OHS ROLES AND RESPONSIBILITIES

Key OHS roles and responsibilities are identified in Table 2-1. Each Contractor shall adapt and expand this table to include named individuals, lines of reporting, and contact information.

Table 2-1. Key OHS Roles and Responsibilities

Function / Role	Key OHS Responsibilities	Phase(s)	Primary Entity
PETDE Senior Management / PMT	<ul style="list-style-type: none"> - Approve and endorse SEEP OHS Policy - Ensure resources to implement OHS Plan - Integrate OHS requirements into contracts and procurement - Approve CESMPs including Contractor OHS Plans - Ensure serious incidents are notified to the World Bank in line with ESCP - Oversee implementation of ESMP and OHS Key Performance Indicators (KPIs) - Confirm, before site handover and authorization to commence works, that ESS5 requirements have been met for each workforce, including completion of any required RP/LRP measures or agreed interim arrangements, in line with the ESCP and relevant RPs/LRPs 	All	PETDE/PMT
PETDE O&M Directorates	<ul style="list-style-type: none"> - Develop and implement O&M OHS procedures aligned with this Plan - Ensure safe energization and isolation of assets - Coordinate access permits and switching operations - Maintain O&M training and competency for O&M staff - Coordinate on incident investigations affecting O&M staff 	O&M	PETDE O&M
Owner's Engineer (OE)	<ul style="list-style-type: none"> - Review and recommend approval of Contractors' OHS Plans, method statements and risk assessments - Monitor OHS performance on site - Conduct site inspections and audits - Verify corrective actions - Advise PETDE/PMT on OHS non-compliance - Support incident investigation and reporting 	Pre-construction & Construction	OE
EPC Contractor Project Manager	<ul style="list-style-type: none"> - Overall accountability for Contractor OHS performance - Approve Contractor OHS Plan - Ensure adequate OHS staffing, budget and equipment - Enforce "stop work" authority - Ensure subcontractor OHS compliance - Ensure that no mobilization or commencement of works occurs in any area where PETDE/PMT has not confirmed that ESS5-related land access and any 	Construction	Contractor

Function / Role	Key OHS Responsibilities	Phase(s)	Primary Entity
	applicable RP/LRP obligations have been fulfilled or that safe interim arrangements are in place		
EPC Contractor Health, Safety and Environment (HSE) Manager	<ul style="list-style-type: none"> - Lead development and implementation of Contractor OHS Plan - Coordinate hazard identification and risk assessments (HIRA/ Job Safety Analysis (JSA)) - Ensure training, Personal Protective Equipment (PPE), inspections, incident investigation and reporting - Maintain OHS records and statistics - Liaise with PETDE/PMT and OE on OHS matters - Ensure that no mobilization or commencement of works occurs in any area where PETDE/PMT has not confirmed that ESS5-related land access and any applicable RP/LRP obligations have been fulfilled or that safe interim arrangements are in place 	Construction	Contractor
Site OHS Supervisors / HSE Officers	<ul style="list-style-type: none"> - Conduct daily supervision of work activities - Enforce safe systems of work, permits and PPE - Lead toolbox talks - Conduct inspections and near-miss reporting - Stop unsafe work - Ensure emergency preparedness at work fronts 	Construction	Contractor / Subcontractors
Line & Substation Supervisors / Foremen	<ul style="list-style-type: none"> - Ensure crews follow method statements and JSAs - Verify PPE use - Control access to hazardous areas (e.g. energized yards, tower work) - Coordinate with OE and PETDE O&M for permits and outages 	Construction & O&M interface	Contractor
UXO/ERW Specialist (where applicable)	<ul style="list-style-type: none"> - Implement project UXO/ERW procedures - Conduct risk assessments and clearance - Define no-go areas - Train workers on UXO/ERW awareness - Issue "all-clear" before intrusive works 	Pre-construction & Construction	PETDE/PMT (through specialized provider) / Contractor
Security Provider (if engaged)	<ul style="list-style-type: none"> - Implement security management plan consistent with ESF and ESMP - Prevent and manage security-related incidents 	All	PETDE/PMT & Security Provider

Function / Role	Key OHS Responsibilities	Phase(s)	Primary Entity
	<ul style="list-style-type: none"> - Respect and implement Code of Conduct and SEA/SH prohibitions - Coordinate with PETDE and Contractor on access control without infringing OHS 		
Workers & Worker OHS Committees	<ul style="list-style-type: none"> - Follow OHS procedures, training and instructions - Use PPE - Report hazards, near misses and incidents - Participate in toolbox talks and OHS committees - Use worker GM if needed - Exercise right to refuse unsafe work 	All	All employers

3. APPLICABLE LEGAL AND STANDARDS FRAMEWORK

The OHS Plan shall explicitly reference and incorporate:

1. National Legislation

- Applicable Syrian labor and OHS legislation, regulations and decrees.
- National requirements for electrical safety, construction permits, medical surveillance, accident reporting and fire safety.

2. World Bank ESF and Related Instruments

- ESS1: Assessment and Management of Environmental and Social Risks and Impacts (overall ES risk management).
- ESS2: Labor and Working Conditions (OHS, worker GM, SEA/SH in the workplace).
- ESS4: Community Health and Safety (traffic, public safety, hazardous materials, security personnel).
- ESS10: Stakeholder Engagement and Information Disclosure (including GMs).

3. WBG EHS Guidelines

- General EHS Guidelines (OHS, community health and safety, life and fire safety, emergency preparedness and response).
- EHS Guidelines for Electric Power Transmission and Distribution (work at height on towers, live-line work, substation safety, EMF, right-of-way management).

4. Other Relevant Standards and Good Practice

- International Labour Organization (ILO) Conventions and Codes of Practice relevant to OHS (e.g. OSH, construction, electrical safety).
- Manufacturer instructions and data sheets (e.g., for cranes, lifting gear, Sulphur Hexafluoride (SF₆) equipment, PPE).

Contractors shall maintain a Legal and Standards Register within their OHS Plan and keep it updated.

4. OHS MANAGEMENT SYSTEM APPROACH

Contractor OHS Plans and PETDE O&M OHS arrangements shall follow a plan-do-check-act cycle:

- Policy: Written OHS Policy, signed by top management (Contractor and PETDE), communicated to all staff.
- Planning: Systematic hazard identification and risk assessment; objectives and targets; allocation of resources.
- Implementation: Procedures, method statements, training, supervision, PPE, emergency preparedness.
- Checking: OHS inspections, monitoring, incident reporting and investigation, internal audits.

- Management Review: Periodic review of OHS performance and Plan effectiveness, with documented actions.

Contractor Plans shall be submitted to PETDE/PMT and OE for review and approval prior to mobilization, and kept updated whenever work methods or risk profile change.

5. HAZARD IDENTIFICATION AND RISK ASSESSMENT

5.1 METHODOLOGY

Each Contractor shall:

- Prepare task-specific Hazard Identification and Risk Assessments (HIRA) or Job Safety Analyses (JSA) for all key activities.
- Assess likelihood and consequence for each hazard, define risk ratings and corresponding controls.
- Review and update risk assessments whenever:
 - Work methods change.
 - New equipment or materials are introduced.
 - An incident/near miss indicates an unaddressed hazard.
 - There are changes in UXO/ERW risk, security conditions or community context.

Risk assessments shall specifically address critical OHTL and substation risks including those listed in Section 6.

5.2 CRITICAL RISK CONTROLS

The main critical OHTL and substation risks and the corresponding minimum control measures are summarized in Table 5-1, which Contractors shall adapt and expand for their site-specific risk assessments.

Table 5-1. Critical OHTL and Substation OHS Risks and Minimum Controls

Activity / Hazard	Minimum Controls (Examples – to be detailed by Contractor)	OHTL / Substation	Primary Responsibility
Work at height (towers, gantries, platforms)	<ul style="list-style-type: none"> - Work-at-height procedure - Certified anchor points - Full-Body harness with double lanyard and shock absorber - Fall-Arrest systems - Edge protection where feasible - Rescue plan and equipment - Medical fitness for height work 	OHTL & Substation	Contractor
Live-line / working near energized equipment	<ul style="list-style-type: none"> - Permit-to-work system - Lockout-tagout (LOTO) - Isolation and earthing verified with PETDE O&M - Safe clearances - Only authorized, competent electrical personnel - Insulated tools and PPE - Use of barriers and signage - No simultaneous work near live parts without approval 	Mainly Substation & OHTL crossings	Contractor & PETDE O&M
Confined spaces (cable trenches, oil pits, tanks, manholes)	<ul style="list-style-type: none"> - Confined-space entry procedure and permit - Atmospheric testing - Forced ventilation where required - Standby person - Retrieval equipment - Rescue plan - Training - Specific PPE 	Substation and limited OHTL works	Contractor
Lifting operations (towers, transformers, equipment)	<ul style="list-style-type: none"> - Lifting plan signed by competent person - Certified cranes and lifting tackle - Pre-use checks 	OHTL & Substation	Contractor

Activity / Hazard	Minimum Controls (Examples – to be detailed by Contractor)	OHTL / Substation	Primary Responsibility
	<ul style="list-style-type: none"> - Defined exclusion zones - Competent riggers and signalers - Ground bearing capacity assessment - Weather limits (wind) - Lifting near overhead lines controlled 		
Traffic and vehicle movements (including stringing along roads)	<ul style="list-style-type: none"> - Traffic Management Plan (see separate TMP) - Access route risk assessments - Signage and flagmen - Speed limits - Vehicle and driver requirements - Journey management for long trips - Fatigue management 	OHTL & Substation	Contractor
UXO/ERW	<ul style="list-style-type: none"> - No intrusive works before UXO/ERW clearance - Use of accredited UXO/ERW service - Marking of suspected areas - Worker UXO/ERW awareness training - Stop-work and evacuation procedure for suspicious items - Coordination with authorities and UNMAS/competent agency 	OHTL & Substation, especially conflict-affected areas	PETDE/PMT (UXO strategy) & Contractor (implementation)
Heat stress and climatic conditions	<ul style="list-style-type: none"> - Heat-stress management plan - Work/rest cycles - Shaded rest areas - Potable water and electrolytes - Acclimatization - High-temperature work restrictions - Monitoring for heat exhaustion - Clothing appropriate to climate 	All	Contractor & PETDE O&M

Activity / Hazard	Minimum Controls (Examples – to be detailed by Contractor)	OHTL / Substation	Primary Responsibility
Hazardous materials (fuels, oils, SF ₆ , batteries, solvents)	<ul style="list-style-type: none"> - Integration with Hazardous/Waste Management Plan - Material Safety Data Sheet (MSDS) available - Spill kits - Storage in bunded and ventilated areas - Specific PPE - SF₆ handling by trained personnel with leak Detection and capture systems 	OHTL & Substation	Contractor & PETDE O&M
Security-related risks	<ul style="list-style-type: none"> - Coordination with security provider and PETDE - Briefings on security risks - Safe travel guidance - Radio/phone communications - Curfew and restricted movement rules - Reporting and management of security incidents 	All	PETDE/PMT, Contractor, Security Provider
GBV/SEA/SH in workplace and worker-community interactions	<ul style="list-style-type: none"> - Enforce Code of Conduct (CoC) with SEA/SH clauses - GBV/SEA/SH training - Separate and confidential reporting channels (linked to project GM and survivor-centered services) - Sanctions for perpetrators - Clear prohibition of transactional sex and harassment 	All	PETDE/PMT & Contractor

6. OHS PROCEDURES FOR HIGH-RISK ACTIVITIES

Each Contractor shall prepare and implement written procedures / method statements, approved by qualified OHS and technical staff and reviewed by OE, at minimum for the following.

6.1 WORK AT HEIGHT

- Requirements for planning tower and gantry work.
- Access systems (ladders, climbing systems, mobile elevated work platforms where used).
- Fall protection systems (harness, lanyards, anchor points).
- Prevention of dropped objects (tool lanyards, barricading).
- Emergency response and rescue (suspended worker rescue, stretcher access).

6.2 ELECTRICAL SAFETY AND LOTO

- Permit-to-work procedure for all work on or near electrical systems.
- Isolation, lockout and tagging protocol, coordinated with PETDE O&M control centers.
- Earthing procedures and verification.
- Safe approach distances depending on voltage.
- Controls for temporary supplies and tools (RCDs, insulation).

6.3 CONFINED SPACE ENTRY

- Confined-space inventory and classification.
- Entry permits, gas testing and monitoring.
- Ventilation and isolation of energy sources.
- Rescue planning and training.

6.4 LIFTING AND RIGGING

- Preparation of lifting plans for critical and non-routine lifts (e.g. transformers, large components).
- Use of certified equipment and periodic inspection logs.
- Exclusion zones and communication protocols (hand signals, radios).
- Wind speed and weather limitations.

6.5 TRAFFIC AND ROAD SAFETY

- Implementation of the project Traffic Management Plan.
- Speed limits and driving rules near communities and schools.
- Requirements for defensive driving training where relevant.
- Control of pedestrian-vehicle interactions at site entrances and within substations.

6.6 UXO/ERW INTERFACE

- Alignment with SEEP UXO/ERW procedures described in the ESMPs (Annexes A and B) and with Annex H - Emergency Response Plan (ERP).
- Pre-work UXO/ERW clearance and certificate from UNMAS for corridor and substation work areas.
- Clearly defined responsibilities between PETDE/PMT, UNMAS, and Contractors.
- Stop-work and notification procedures in case of suspected UXO/ERW (ERW Chance-Finds Procedure).

6.7 HEAT STRESS AND ADVERSE WEATHER

- Criteria for high heat index conditions and associated restrictions.
- Provision of water, rest areas, and cooling measures.
- Controls for dust storms, high winds (especially for tower work and cranes), heavy rains or storms.

6.8 HAZARDOUS MATERIALS AND EXPOSURE CONTROL

- Integration with Hazardous/Waste Management Plan.
- Safe handling, storage, labeling and transport of fuels, lubricants, solvents, SF₆ and other chemicals.
- Exposure controls (ventilation, PPE, substitution where feasible).
- Spill response and decontamination procedures.

6.9 OCCUPATIONAL HEALTH AND COMMUNICABLE DISEASES

- Hygiene, sanitation, and potable water provisions at sites and camps.
- Controls for communicable diseases (e.g. respiratory infections), in line with national and World Health Organization (WHO) guidance.
- Vaccination and health promotion where appropriate.

6.10 GBV/SEA/SH AND OHS INTERFACE

- Incorporation of GBV/SEA/SH risk mitigation into OHS inductions and toolbox talks.
- Reinforcing CoC obligations in relation to harassment and behavior towards coworkers and community members.
- Clear, confidential reporting pathways and non-retaliation guarantees.

7. WORKER ENGAGEMENT, COMMUNICATION AND GM INTERFACE

7.1 WORKER INFORMATION AND CONSULTATION

- All workers shall receive OHS information in languages they understand (including Arabic as a minimum).
- Regular toolbox talks shall discuss current work tasks, specific hazards, near-misses and lessons learned.

- Worker OHS committees or representatives shall be established for larger worksites.

7.2 WORKER GM

- The OHS Plan shall reference and align with the Worker GM defined in the LMP and ESMP.
- Workers shall be able to raise OHS concerns, complaints, or suggestions through:
 - Direct reporting to supervisors or HSE officers.
 - Worker OHS committees.
 - Anonymous channels as per the Worker GM.
- The Plan shall define:
 - How OHS-related grievances are logged, investigated and closed.
 - Escalation paths for unresolved or serious concerns.
 - The link between OHS incidents and the broader GM (for example, when OHS issues have GBV/SEA/SH or security dimensions).

7.3 COMMUNITY GM INTERFACE

- Community OHS concerns (e.g., traffic safety, dust, noise, public safety near works) received through the community GM (SEP) shall be integrated into OHS risk assessments and mitigation measures.
- Contractors shall cooperate fully with PETDE/PMT to address such concerns.

8. TRAINING, AWARENESS AND COMPETENCY

8.1 GENERAL REQUIREMENTS

- No worker shall perform a task for which they are not adequately trained and assessed as competent.
- Records of all OHS trainings, toolbox talks, and competency assessments shall be maintained.

8.2 TRAINING MATRIX

Table 8-1 presents a template OHS training matrix that PETDE and Contractors shall customize to specify the required trainings, target groups, minimum frequency, delivery responsibilities, and record-keeping arrangements. Contractors and PETDE O&M shall adapt this matrix to include any project- or site-specific trainings.

Table 8-1. OHS Training Matrix

Training / Awareness Topic	Target Personnel	Minimum Frequency	Responsible for Delivery	Record(s)
Project OHS induction (including ESMP, CoC, SEA/SH, GMs)	All workers and visitors	Before starting work / site access	Contractor HSE Manager / PETDE for PETDE staff	Induction register, signed forms
Task-specific method statement & JSA briefing	Workers involved in the task	Before task starts and when method changes	Supervisors / HSE Officers	Toolbox talk forms
Work-at-height and fall protection	Tower and gantry workers, supervisors	Before assignment and refresher annually	Competent trainer	Certificates, attendance sheets
Electrical safety and LOTO	Electrical workers, authorized persons	Before assignment and refresher at least annually	PETDE O&M / Contractor electrical engineer	Authorization list, training records
Confined space entry	Workers involved in entry, stand-by personnel	Before assignment; periodic refreshers	Competent trainer	Training records, permit logs
Lifting and rigging	Crane operators, riggers, signalers	Before assignment; periodic refreshers	Competent trainer / OEM	Licenses/certifications
Traffic and defensive driving	Drivers and operators	Before assignment; refreshers (e.g., annually)	Competent trainer	Training certificates
UXO/ERW awareness	All staff in UXO/ERW risk areas	Before entering risk areas; refreshers per risk level	UXO/ERW specialist	Attendance lists
GBV/SEA/SH awareness and CoC	All workers, including security	At induction and refresher (e.g., every 6-12 months)	GBV/SEA/SH specialist / HSE with GBV focal point	Attendance lists, signed CoC
First aid and emergency response	Designated first aiders and emergency team	Initial training and periodic refreshers	Qualified provider	Certificates
O&M-specific OHS training	PETDE O&M staff	As per PETDE procedures	PETDE O&M	Training logs

9. BUDGET AND RESOURCES

The OHS Plan shall include provisions for occupational health management, including:

- Pre-employment and periodic medical examinations appropriate to tasks (e.g., work at height, confined spaces, driving, handling hazardous materials).
- Fitness-for-work assessments following serious illness, injury, or prolonged absence.
- First aid facilities and trained first aiders at all active work fronts, camps, and substations, with equipment appropriate to the risk profile.
- Emergency medical arrangements, including:
 - Contact details and route maps to nearest medical facilities.
 - Evacuation arrangements (vehicles, communication, escorts in insecure areas).
- Health promotion (hydration, nutrition, smoking cessation, communicable disease awareness).

10. PERSONAL PROTECTIVE EQUIPMENT (PPE)

The OHS Plan shall define:

- PPE Policy – provision of PPE by the employer at no cost to workers, in line with ESS2 and applicable law.
- Minimum PPE for all construction work (as a baseline): hard hat, safety boots, high-visibility vest, appropriate work clothing, eye protection where needed.
- Task- or risk-specific PPE (examples):
 - Work at height: full-body harness, shock-absorbing lanyards.
 - Electrical work: arc-rated clothing, insulated gloves and tools, face shields.
 - Cutting, grinding, concrete works: goggles, face shields, gloves, hearing protection, respiratory protection.
 - SF₆ handling: appropriate respiratory protection and gloves as per MSDS.
- Procedures for selection, issue, replacement and maintenance of PPE.
- Controls against the use of inappropriate clothing that may exacerbate heat stress and other risks, in line with ESS2 and ESMP findings.

11. INCIDENT, NEAR-MISS AND NON-CONFORMANCE MANAGEMENT

The OHS Plan shall define procedures for:

- Classification of events, including near-miss, minor, lost-time, serious and fatal incidents.
- Immediate response, including first aid, securing the scene, and making it safe.
- Notification:
 - Internal notification within Contractor and PETDE/PMT and OE.

- Notification to PETDE/PMT and OE of all serious incidents and fatalities within the timeframe specified in the ESCP for onward notification to the World Bank.
- Interface with GMs where incidents have GBV/SEA/SH, security or community implications.
- Investigation:
 - Formal investigation of all serious incidents and significant near-misses using root-cause analysis.
 - Involvement of PETDE/PMT and OE in serious incident investigations.
- Corrective and preventive actions:
 - Documentation of actions, deadlines, responsible persons.
 - Follow-up and closure.
- Recording and reporting:
 - Maintenance of an incident/near-miss register.
 - Monthly OHS performance reports (including incident statistics) from Contractors to PETDE/PMT and OE, consistent with ESMP and ESCP reporting requirements.

12. OHS PERFORMANCE MONITORING AND REPORTING

The OHS Plan shall define:

- Leading indicators (examples): number of inspections conducted, toolbox talks held, near-misses reported, training hours delivered, percentage of corrective actions closed on time.
- Lagging indicators (examples): total recordable incident rate, lost time injury frequency, severity rate, number of serious incidents and fatalities.
- Site inspections and audits:
 - Daily inspections by Contractor supervisors.
 - Planned inspections by Contractor HSE team.
 - Joint inspections by Contractor, OE and PETDE representatives.
- Reporting:
 - Contractor monthly OHS reports to PETDE/PMT and OE.
 - PETDE consolidated quarterly and annual OHS reporting in line with ESCP and ESMP.

13. EMERGENCY PREPAREDNESS AND RESPONSE INTERFACE

This OHS Plan shall interface with the Project Emergency Response Plan (ERP) and shall ensure that:

- Site-specific emergency scenarios are identified (fires, major spills, SF₆ leaks, structural collapse, major accidents, UXO/ERW incidents, security incidents, natural hazards).
- Clear emergency roles, responsibilities and contact lists are posted at each worksite and substation.
- Emergency equipment (fire extinguishers, spill kits, first aid kits, alarms, communication devices) is available, inspected and maintained.

- Regular emergency drills are organized (e.g. fire drill, medical evacuation, UXO/ERW incident), with participation of Contractor, PETDE, OE, and, where appropriate, local authorities.
- Lessons learned from drills and actual events are incorporated into OHS and ERP revisions.

14. INTERFACE WITH OTHER ESMP PLANS

This OHS Plan shall cross-reference and coordinate with:

- Traffic Management Plan (TMP): for road safety and vehicle movements.
- Hazardous/Waste Management Plan (WMP + HMMP): for hazardous materials exposure and spill risks.
- Cultural Heritage Chance-Finds Procedure: for protection of cultural heritage and safe management of finds.
- ERW Chance-Finds Procedure: for explosive risk controls.
- GBV/SEA/SH Measures, LMP, SMP, and SEP: for worker and community protection, Code of Conduct, and GMs.

Contractors and PETDE shall ensure that procedures and responsibilities are consistent across these documents.

15. PLAN IMPLEMENTATION, REVIEW AND UPDATE

- Contractors shall submit their site-specific OHS Plans (based on this template) as part of their CESMP for PETDE/PMT and OE review and approval before mobilization.
- PETDE shall ensure that O&M OHS procedures are updated in line with this Plan before energization of rehabilitated assets.
- This OHS Plan and contractor-specific OHS Plans shall be reviewed at least annually, and sooner if:
 - There is a serious incident.
 - There are significant changes in scope, methods, or risk profile (e.g. new work fronts in higher UXO/ERW or security risk areas).
 - There are changes in applicable legal or World Bank requirements.
- Revisions shall be documented, dated and communicated to all relevant personnel.