

1 Environmental and Social Action Plan

The table below constitutes the ESAP. It identifies the required actions during pre-construction, construction and operation of the project. Implementation of the actions is the responsibility of Koridori Srbije d.o.o (KSDOO). When contractors perform work under contract, KSDOO will be responsible for those contractors' compliance with the requirements of the ESAP.

	Action	Environmental & Social Risks (Liability /Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable action to be completed by end of year	Target and Evaluation Criteria for Successful Implementation	Status
PR1	Assessment and Management of Environmental and Social Impacts and Issues						
1.	<p>Finalise and implement Environmental and Social Management Systems across Koridori Srbije d.o.o (KSDOO) in accordance with ISO14001:2015 or equivalent internationally recognised certification schemes.</p> <p>To include:</p> <ul style="list-style-type: none"> Environmental and social policy Register of EU and Serbian legislation, including relevant international regulations and relevant elements of EBRD's Performance Requirements (PRs) <p>Provide full details of the organisational structure in place to manage compliance with E&S commitments on the Project, covering all project parties including numbers, positions roles, responsibilities, and experience profiles of E&S staff.</p>	Having an efficient ESMS in place will help to minimise the environmental and social impact of KSDOO's activities	EBRD PR1 Good international practice	Responsibility: KSDOO Staff resources and Certification cost	Q4 2019	<p>Operational ESMS and appropriately trained staff in place prior to operation</p> <p>Organisational structure in place to manage compliance with E&S commitments submitted to EBRD</p> <p>EMS Audit Reports and Management reviews</p> <p>Annual EHS Report to the Bank</p>	

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2.	<p>Ensure that the appointed Environment and Social Manager(s) has/have dedicated resources and budget to oversee KSDOO's ESMS, which includes identifying aspects associated with current activities and planned developments, developing environmental policy and procedures aligned with EBRD's Performance Requirements, and this ESAP, managing the corporate entity and the portfolio in accordance with Good International Practice.</p> <p>The Environmental and Social Manager should have reporting lines to senior management in KSDOO and input to board level decision making.</p> <p>KSDOO should also designate one person to monitor contractors' and subcontractors' performance in fulfilling the social aspects of their contractual requirements and, if necessary, undertake corrective measures, and to manage implementation of SEP, RPF, ESAP and HRMS accordingly.</p>	<p>Having a dedicated Environmental and Social Manager and ensuring senior management are involved at the outset will ensure ESMS requirements filter through the company.</p> <p>Protection of brand and share value and increased commitment to transparency and good governance.</p>	<p>EBRD PR1 Good International Practice E&S governance practices</p>	<p>KSDOO Staff resources</p>	<p>Within 6 months of EBRD agreement</p>	<p>Record of appointment and implementation of the tasks within action.</p> <p>Job description for Environment Manager setting out roles and responsibility and lines of reporting; appropriate decision making authority and budgets.</p> <p>Job description for Social Manager setting out roles and responsibility and lines of reporting; appropriate decision making authority and budgets.</p>	
3.	<p>Review the wording of procedures and supplier contracts to ensure that EBRD (and this ESAP) requirements are covered appropriately within the supply chain and contractors are managed appropriately.</p> <p>KSDOO should use the services of a</p>	<p>To assure that E&S considerations are extended through the supply chain and</p>	<p>PR1: Environmental and Social Appraisal and Management PR2: Labour</p>	<p>Responsibility: KSDOO</p> <p>Staff resources: suitably qualified environmental,</p>	<p>Q1 2019</p>	<p>Revised procedures</p> <p>Revised model contracts for Works and Services to include EBRD (and this ESAP) requirements</p>	

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	<p>suitably qualified environmental, social, health and safety specialist/s to prepare the specifications for ESHS working with a procurement specialist/s.</p> <p>In preparing detailed specifications for ESHS requirements, the specialists should refer to:</p> <ul style="list-style-type: none"> • ESIA/ Framework ESMP • this ESAP • consent/permit conditions • required standards including EBRD PRs • national legal and/or regulatory requirements and standards • the Stakeholder engagement plan and grievance redress mechanisms • the Resettlement Policy Framework. 	<p>during construction of highway.</p>	<p>and Working Conditions</p>	<p>social, H&S and procurement specialist/s.</p>			
4.	<p>Develop Framework Construction Environmental and Social Management Plans (ESMP) to capture ESIA commitments, national and Lender requirements. The Framework ESMP should reflect on the legal framework as well as reporting requirements, and also include provisions for regular training of staff. The Framework ESMP should include:</p> <ul style="list-style-type: none"> • Organisational structure, roles and responsibilities for environmental, social and stakeholder management • Mitigation to address cumulative 	<p>Manage environmental and social issues during construction, and to ensure that mitigation proposed in EIA is incorporated into the Project design and construction activities</p>	<p>EBRD PR1 Good International Practice</p>	<p>KSDOO</p>	<p>November 2018</p>	<p>Draft Framework ESMPs provided to Lenders for review and approval</p> <p>Framework ESMPs to be disclosed on KSDOO website</p>	

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	<p>impacts of the proposed highway.</p> <ul style="list-style-type: none"> • ESIA commitments and how these will be delivered • Labour Management Plan • Waste management Plan • Pollution Prevention Plan • Health and Safety Plan including the Traffic Management Plan • Local infrastructure assets baseline survey • Design change management plan • Supply chain management plan • River crossings management plan • Habitat protection plan • Stakeholder Engagement Programme including the Grievance Mechanism • Environmental and social monitoring plan • Compliance assurance program • Community Health & Safety Management Plan • Local Content Plan (for hiring and procurement) 						
5.	Develop and implement a Construction Environmental and Social Management Plan (CESMP) to implement ESIA commitments, national and Lender requirements. The plan should reflect on the legal framework as well as reporting requirements, and also include provisions for regular training of staff. The CESMP	Manage environmental and social issues during construction, and to ensure that mitigation proposed in EIA	EBRD PR1 Good International Practice	Appointed construction contractor: own resources Supervising Engineer and KSDOO to review and	CESMP to be developed at least 2 months prior to commencement of works to correspond with the legal/contractual term as defined under FIDIC	Quarterly EHS Report to the Bank to reflect on the implementation of CESMP ESMPs to be disclosed on KSDOO website	

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	<p>should build upon the framework ESMPs and include:</p> <ul style="list-style-type: none"> • Organisational structure, roles and responsibilities for environmental, social and stakeholder management • Mitigation to address cumulative impacts of the proposed highway. • ESIA commitments and how these will be delivered • Labour Management Plan • Waste management Plan • Pollution Prevention Plan • Health and Safety Plan including the Traffic Management Plan • Local infrastructure assets baseline survey • Design change management plan • Supply chain management plan • River crossings management plan • Habitat protection plan • Stakeholder Engagement Programme including the Grievance Mechanism • Environmental and social monitoring plan • Compliance assurance program • Community Health & Safety Management Plan • Local Content Plan (for hiring and procurement) 	<p>is incorporated into the Project design and construction activities</p>		<p>approve.</p>	<p>Workforce trained on CESMP before construction works start on site.</p> <p>CESMP to be implemented during pre-construction and construction phases.</p>		

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PR2	Labour and Working Conditions						
6.	<p>Develop Project specific Human Resource Management System (HRMS) to set up the requirements to adhere to the national labour law and EBRD PR2, social security and occupational health and safety laws, as well as with the fundamental principles of ILO conventions.</p> <p>The HRMS is also to include the guidelines for internal grievance mechanism applicable to all contractors, sub-contractors consultants or suppliers working on the Project. Through the procurement process ensure that the requirements under HRMS are applied to all responsible organisations (contractors, subcontractors, suppliers and providers of services)</p>	National legislation and EBRD PR 2 requirements regarding labour and working conditions not being met by project participants (contractors, sub-contractors, consultants or suppliers)	PR2: Labour and Working Conditions	KSDOO staff resources	<p>End of 2018</p> <p>Or at least before the start of the procurement process for construction stage</p>	HRMS in place and referred to in the procurement documents	
7.	<p>Employment Plan will be adopted by the contractor to serve as an umbrella document ensure conformance with the requirements of the HRMS and cover, at minimum, requirements for: working conditions, terms of employment, prevention of child labour, forced labour and freedom of association, as well as community employment plan.</p> <p>In case a workers accommodation is required on site the contractor is also</p>	Labour and working conditions on site not meeting the requirements of the national legislation and PR2.	PR2: Labour and Working Conditions	The Contractor	Before the start of construction works	<p>Employment Plan in place and approved by KSDOO</p> <p>Workers Accommodation option plan in place and approved by KSDOO</p> <p>Security personnel Code of Conduct in place and approved by KSDOO</p>	

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	expected to prepare the Workers Accommodation option plan in line with “Worker’s accommodation: Process and Standards” Guidance note by IFC and EBRD, to ensure that the workers on site accommodation meet the requirements for health and safety, and personal wellbeing. Security personnel Code of Conduct to be developed in line with PR2 requirements if any security personnel are employed on site as they would be the first line of contact with the local community.						
PR4	Health and Safety						
8.	Carry out a Road Safety Inspection (RSI) on the road once operational, reflecting also on the recommendations resulting from the Road Safety Audit and if appropriate action plans developed for low cost remedial road safety measures.	Health and safety risks for users addressed in the design and operational phase Reduction of accident risks and improved road safety	National regulatory requirements, EBRD PR 4, EU Directive on Road Infrastructure Safety Management (2008/96/EC)	Responsibility: KSDOO Resources: In house resources, external resources as appropriate (consultants, designers, etc.)	RSI to be completed during Defect Notification Period (DNP)	Documented Road Safety Inspection Key findings incorporated into final operational management plans Report in AESR to EBRD	
PR5	Land Acquisition, Involuntary Resettlement and Economic Displacement						
9.	Prepare a RAP for the project. During the preparation of the RAP a full asset survey and socioeconomic study of affected households to be conducted in order to assess the full scale of physical or economic displacement and develop	Failure to assess the full scale of displacement impacts the landowners will be exposed to	PR 5: Land Acquisition, Involuntary Resettlement and Economic	KSDOO, and Social Consultant	End of 2018 Or at least 6 months prior to start of the expropriation process RAP disclosed 4	RAP to be approved by EBRD	

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	<p>effective compensation measures accordingly. Particular attention shall be taken to identify vulnerable groups and individuals and establish suitable support to them to allow them to reinstate their livelihoods following expropriation.</p> <p>Ensure meaningful consultation with the local community during RAP preparation in order to address their concerns in the final document.</p> <p>Introduce standard forms to be used in the experts' valuation reports for property.</p>	<p>from the project could increase the number of received grievances, slow down the land acquisition process and create tensions with the local community prior to start of construction.</p>	<p>Displacement Good International Practice PR 5: Land Acquisition, Involuntary Resettlement and Economic Displacement Good International Practice</p>		months prior to expropriation.		
10.	<p>Prepare a summary of the RAP (i.e. a Guide to Land Access and Compensation) that summarises key elements including: the project's economic and physical displacement impacts, the principle compensation strategies, the means of accessing compensations, the grievance mechanism, etc.</p>			Social Consultant	RAP summary disclosed 4 months prior to expropriation.	RAP summary to be approved by EBRD	
11.	<p>Appoint an independent external consultant to conduct periodic evaluation of the resettlement process along with a completion audit at the end of the process to verify the effectiveness of the implemented measures. Indicators for the evaluation should cover both outputs (number of processed cases, compensation received, grievances processed and similar) and outcomes (participation in the consultation process,</p>			KSDOO	Before the start of construction	<p>ToR agreed with EBRD</p> <p>EBRD to have non-objection rights on selection of the consultant</p> <p>Independent consultant service contract awarded</p>	

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	impact of compensation on households and living arrangements, ability/success in restoring livelihood incomes following expropriation, etc.)						
12.	Include stipulations in procurement contracts that contractors manage any temporary land-access consistently with the requirements of the project RPF and RAP. Regularly monitor contractor land access, compensation and any grievances to ensure conformity.			Contractor KSDOO	Throughout the construction phase	Procurement documents including clauses requiring conformance with the RPF and RAP. Contractor Grievance Management included in quarterly EHS report to EBRD	
PR6	Biodiversity and Living Natural Resources						
13.	Undertake additional pre-construction biodiversity surveys for flora and fauna, in locations identified as being of higher potential for biodiversity impacts (IPA Lalinacke Slatine, Toplica River and its tributaries affected by the highway). Contractor to implement mitigation measures identified.	To ensure that impacts on biodiversity are understood and appropriate mitigation is proposed and implemented	Local regulatory requirements, EBRD PR 6 Best Practice	Responsibility: Contractor in consultation with KSDOO Environment Manager to appoint biodiversity expert to undertake the surveys and to prepare River Crossings Management Plan and Habitat Protection Plan Contractor to	ToR for rapid assessments to be agreed with EBRD by Q1 2019 Surveys to be undertaken and Plan prepared prior to construction. Implementation of plan throughout construction.	Expert and mitigation measures to be agreed with EBRD prior to implementation. Pre-construction survey reports reviewed and approved by KSDOO. River Crossings Management Plan and Habitat Protection Plan approved by KSDOO and implemented. KSDOO to report on	

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				implement any agreed mitigation measures		updates in AESR to EBRD	
PR8	Cultural Heritage						
14.	Ensure that the Contractor develops and implements a Chance Find Procedure. This will include notification of Institute for Culture Monuments Protection of found objects, alerting project personnel to the possibility of chance finds being discovered and preventing any disturbance or destruction pursuant to the Law on Cultural Heritage (Official Gazette of Republic of Serbia, No. 71/94). Contractor to implement mitigation measures identified.	To ensure that impacts on Cultural Heritage assets are identified and mitigated Input from relevant authorities are required under national Regulation.	EBRD PR 8 EU EIA Directive National Regulation	KSDOO to oversee. Contractor to develop with the support of a suitably qualified cultural heritage consultants	Prior to commencement of construction of projects for the duration of the construction	Documented procedure KSDOO to report on updates in AESR to EBRD.	
15.	Ensure that requirement for Archaeological Monitoring during construction is included in the Procurement Plan for the Project and that suitably qualified Archaeology Service Agency is contracted prior to any works on site. KSDOO is required to maintain watching brief during works, with clear procedures for protection and documentation (late finds protocol) incorporated into construction contracts. KSDOO will finance pre-excavation, producing new	Preservation on cultural heritage and minimising risks to archaeological remains.	EBRD PR 8 EU EIA Directive National Regulation	KSDOO/ Institute for Protection of Cultural Heritage	Prior to commencement of construction for the duration of construction	Documented procedure: <ul style="list-style-type: none"> Archaeological Monitoring in place Watching brief during works, incorporated into construction contracts KSDOO to report on updates in AESR to EBRD.	

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	documentation, ensure conservation of physical cultural resources (if any).						
PR10 Information Disclosure and Stakeholder Engagement							
16.	Implement the Stakeholder Engagement Plan, including the Grievance Management Procedure. Oversee contractor management of grievances as outlined in the SEP to ensure conformance.	Ensure that people are informed and consulted about environmental and social issues related to the Project and that grievances are addressed in a transparent and timely manner. Timely information to citizens will enable them to plan and will reduce tensions and grievances in the affected communities, as well as contribute to avoiding any income/business losses.	PR10: Information Disclosure and Stakeholder Engagement	KSDOO Costs associated with printing of any notification material (leaflets, posters) Contractor	Start in 2018 At least one month prior to any changes to regular operations Ongoing throughout project implementation	Update KSDOO's website Publish SEP, ESAP and NTS Stakeholders informed and consulted about the Project Project leaflets developed and distributed SEP and Grievance Management regularly reported in quarterly EHS report to EBRD	

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