

ENVIRONMENTAL AND SOCIAL ACTION PLAN – KVESHETI KOBİ ROAD – LOT 1 - GEORGIA

No.	Action	Environmental & Social Risks (Liability/Benefit)	To comply with	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
PR1	Assessment and Management of Environmental and Social (E&S)¹ Impacts and Issues						
1.1	<p>Monitoring and reporting to EBRD</p> <p>1) Prepare annual monitoring reports that include the status of ESAP implementation, EMP and LARP implementation, EHS performance, stakeholder engagement activities and resolution of grievances.</p> <p>2) In addition to the annual monitoring reports, the following reports are required (based on contribution from Contractor and Engineer) during the construction phase only:</p> <ul style="list-style-type: none"> - Semi-annual environmental monitoring reports on EMP/SEMP implementation - Semi-annual social monitoring reports on LARP implementation 	Compliance with EBRD PRs	EBRD PR1 and PR10	<p>1) RD</p> <p>2) RD (reports prepared by Engineer)</p>	<p>Annual submission during the project lifecycle</p> <p>Semi-annual reports during Construction</p>	<p>Submission of an Annual Environmental and Social Report (AESR)</p> <p>Submission of semi-annual reports during construction</p>	
1.2	<p>Environmental/Social Management Systems (ESMS)</p> <p>Implement a Project framework ESMS, including:</p> <ol style="list-style-type: none"> a) Environmental and Social Statement b) Organizational structure details and chart c) Description of Contractor management process and Management of change process d) Environmental Management Plans (EMPs) e) Stakeholder Engagement Plan (SEP) including grievance mechanism f) Land Acquisition and Resettlement Framework (LARF) and Land Acquisition and Resettlement Plan 	Optimisation of environmental management through formalised documents.	EBRD PR1	RD (and external Consultants as required).	<p>a) b) c) Prior to contract signature</p> <p>For items from d) to f) see below</p>	<p>ES Policy and operational EMPs in place.</p> <p>For items from d) to f) see further details in dedicated items below</p>	

¹ E&S= Environmental, Health and Safety and Social

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	(LARP) g) Biodiversity Action Plan (BAP) h) A framework for monitoring and reporting environmental and social performance (including the Environmental Monitoring Plan)						
1.3	<p><u>Specific Environmental Management Plans (SEMPs) - Construction phase</u></p> <p>1) Maintain/update the EMP (for Lot1) and ensure that the latest versions of the EMP is included in the bid documentation and then annexed to the contracts.</p> <p>2) Ensure that the Contractor (for Lot 1) implements the requirements included in the EMP through the development of their own ESMS and Specific Environmental Management Plans (SEMPs) or Method Statements as appropriate.</p> <p>The necessary SEMPs to be prepared by the Contractor in accordance with ESIA/EMPs criteria/recommendations and with the framework ESMP includes but are not limited to:</p> <ul style="list-style-type: none"> - Construction Camp Layout Plan - Construction Camp Management Plan - Waste Management Plan - Topsoil Management Plan - Water and Waste Water Management Plan - Air Quality Management Plan - Noise Control Plan - Tunnel Blasting Plan - Construction Vibration Management Plan - Spill Management Plan - Traffic Management Plan 	Minimisation of the environmental and social impacts of the Project during Construction.	EBRD PR1	1) RD 2) SEMPs preparation: Contractor; SEMPs approval: RD and Engineer 3) Contractor to receive approval from RD and Engineer 4) RD 5) RD	1) Prior to contract signature 2) Contractor ESMS and SEMPs submitted to Road Department within 30 days after commencement of works, and approved before start of the works 3) Approval received before start of the works	1) Contract in place with finalised EMP annexed 2) 3) Contractors' ESMS and SEMPs submitted to Road Department and approved by Engineer 4) No-objection received	

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	<ul style="list-style-type: none"> - Cultural Heritage Management Plan - Occupational and Community Health and Safety Management Plan - Labour and Working Conditions Management Plan - Local Content Management Plan (local procurement and local employment) - Emergency Response Plan - Spoil Disposal Management Plan - Ground Water Management Plan - Recultivation/Land Restoration Plan - Biodiversity Management Plan - Asphalt Plant Management Plan - Concrete Batching Plant Management Plan - Method Statements for Temporary Storage Areas, temporary river crossings and temporary roads - Code of Conduct <p>3) Ensure that the SEMP's prepared by the Contractor are approved by the Engineer before the start of the construction activities.</p>						
1.4	<p><u>Subcontractors</u></p> <p>Ensure that all subcontractors commit to meet same applicable Lenders' standards and to follow the requirements of the ESMS and SEMP's (construction phase) developed by the Contractors, by:</p> <ul style="list-style-type: none"> - 1) including specific clauses in the Contractors' contract - 2) including specific clauses, in all contracts with subcontractors. 	<p>Minimisation of the environmental and social impacts of the Project throughout the entire subcontracting chain</p>	<p>EBRD PR1</p>	<p>1) RD 2) Contractor</p>	<p>1) Before contract signature 2) During construction</p>	<p>1) Specific clauses included in the Contractor' contracts with RD 2) Specific clauses included in the subcontracts with Contractor and monitoring reports from Contractors</p>	

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	The Contractors will monitor the implementation of these requirements by the subcontractors.						
1.5	<p><u>Organizational capacity</u></p> <p>1) RD to prepare an organizational structure framework document for EHSS including roles and responsibilities within the RD, communication framework (amongst RD, PIU and Contractors) and a description of the decision-making process.</p> <p>2) RD to ensure that the RD has sufficient staff for project implementation and with adequate competences on E&S national and international standards.</p> <p>3) RD to ensure that Contractor has sufficient staff for project implementation and with adequate competences on E&S national and international standards. This will include as a minimum:</p> <ul style="list-style-type: none"> - an Environmental and Social Officer, to implement and continually update the SEMP and to oversee and report throughout the contract period (full-time member of staff and on site at least five days per week); he will be the Contractors main focal point for all environmental, social and labour, health and safety and cultural heritage issues - Ecological Clerk of Works (ECoW), to ensure that any pre clearance surveys required are completed before construction commences, identify any areas of particular ecological sensitivity and to translating mitigation requirements written in SEMPs and other management plans into practical measures on the ground; - Health and Safety specialists (at least 1 H&S specialist is required for every 50 workers), to ensure international good practices on OHS and Labour Conditions are implemented as per SEMPs <p>4) Ensure that Engineer has sufficient staff for project implementation and with adequate competences on E&S</p>	<p>Clear and efficient decision-making processes</p> <p>Capacity to implement the project in accordance with applicable standards</p>	EBRD PR1	RD	Since PMS and EPCs contact signature	<p>1) Framework document in place and organization operative</p> <p>2) Staff of RD adequately covering necessary competencies and capable to manage Contractors</p> <p>3) Contractor team in place and adequately experienced</p> <p>4) Engineer team in place and adequately experienced</p>	

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	<p>national and international standards. This will include as a minimum:</p> <ul style="list-style-type: none"> - National Environmental Specialist - International Environmental and Biodiversity Specialist, , to ensure compliance with EMP. The person will be responsible for ensuring the BAP is properly implemented with support of the Contractor in commissioning various surveys, and (s)he will be responsible for developing the BMEP (Biodiversity Monitoring and Evaluation Plan). - National Social Specialist - International Resettlement, Social and Labour Specialist. The person will be responsible for all resettlement aspects of the project. The person will audit workers facilities, accommodation and working conditions. - International Occupational Health and Safety Specialist. - National Health and Safety Specialist - National Cultural Heritage Monitor. The person will allow the preservation by record of archaeological deposits, be present during site clearance and earthworks, and ensure the Chance Find Procedure is implemented. 						
1.6	<p><u>Environmental and Social assessments for Spoil areas and access roads</u></p> <p>1) Carry out a proper site selection and alternative analyses, and design of the spoil areas and access roads in line with preliminary guidance and recommendations defined in the ESIA. The sites used will have to be surveyed and permitted to ensure that no areas of particular ecological or social value are affected by the proposed spoil disposal. The final locations of the temporary (camp, laydown areas) and permanent (spoil disposal) sites will be specified</p>	<p>Management of impacts related to spoil areas, since spoil areas are associated facilities of the Project.</p>	EBRD PR1	Contractor	Before spoil areas are used	<p>Environmental permit obtained from Ministry of Environmental Protection and Agriculture (MoEPA)</p> <p>Supplementary environmental and social documentation submitted to Lenders</p> <p>Spoil disposal sites locations approved by</p>	

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	<p>by the Contractor with consideration of the recommendations provided in the EIA. Locations will be agreed with MoEPA and approved by the Lenders. Spoil disposal sites will be located outside of National Park and national priority habitat.</p> <p>2) Prepare any environmental assessment requested (EIA or other document) to meet national requirements and obtain environmental approval for the spoil disposal.</p> <p>3) If alternatives sites are selected by Contractor (not covered by the ESIA and LARP), Contractor will provide environmental and social documentation (framework document describing requirements and procedure of site selection) in accordance with the ESIA requirements. Preparation of the documentation will include biodiversity surveys (covering relevant season), social field surveys and additional consultation with relevant stakeholders.</p>					the Lenders	
1.7	<p>Permit register</p> <p>1) RD to ensure that a register of all the EHSS permits relevant to the activities performed within the Project is established by Contractor and kept up-to-date, including but not limited to EIA licences (including those related to spoil areas), building permits, water abstraction, wooden area/forest clearing (if necessary), quarry cultivation (if necessary), blasting operations, waste and wastewater handling/disposal licences, industrial plants air emission authorizations, licences related to HS aspects, relocation of infrastructures (e.g. gas and electric networks).</p> <p>2) Contractor to obtain all required permits and consents from relevant authorities and maintain compliance with relevant prescriptions throughout all stages of the</p>	Compliance with national regulatory and permitting framework.	EBRD PR1	<p>1) RD</p> <p>2) Contractor</p> <p>3) Engineer</p>	<p>1) Before start of construction and throughout the project lifecycle:</p> <p>2) as required by national regulation</p> <p>3) as soon as the permits are granted</p>	<p>1) permit register in place and continuously updated</p> <p>2) relevant permits issued</p> <p>3) updated SEMP in place</p>	

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	project. 3) Relevant measures to be put in place to maintain compliance with permits and consent should be included in the relevant SEMP.						
1.8	<p>Monitoring (construction Phase)</p> <p>1) Develop and implement specific monitoring plans for monitoring the impacts against applicable national and international standards as identified in the ESIA (especially in the Environmental Monitoring Plan). The monitoring plans include but are not limited to:</p> <ul style="list-style-type: none"> - Ambient air quality (PM10, PM2.5, CO, NOx, SO2) - Day time and night time noise levels - Day time and night time vibration levels - Surface water quality (turbidity, pH, conductivity, total petroleum hydrocarbons, chemical oxygen demand) - Subsidence Ground - Ground water level - Vegetation - Biodiversity <p>These monitoring plans will be integrated in the relevant SEMP for the construction phase.</p> <p>2) Revise the SEMP if results of monitoring show significant and/or unexpected impacts. The EMP shall be reviewed periodically (at least annually) to evaluate environmental controls and procedures to make sure they are still applicable to the activities being carried out. Reviews will be undertaken by the Contractor and Engineer</p>	Verification of the effectiveness of the mitigation measures developed for the measurable components during construction.	EBRD PR1	<p>1) Contractor</p> <p>2) Engineer to request SEMP revision</p>	<p>Before start of construction</p> <p>Throughout the project lifecycle (monitoring frequencies indicated in the plans)</p>	<p>1) Monitoring plans in place</p> <p>Monitoring plans effectively implemented</p> <p>2) Full EMP reviewed at least annually. Relevant parts of the EMP shall be reviewed more often following a reportable incident.</p>	
1.9	<p>Monitoring (Operation Phase)</p> <p>1) Develop operational SEMP in line with the ESIA/EMP requirements, including as a</p>	Verify the effectiveness of the mitigation	EBRD PR1	<p>1) Contractor</p> <p>2) RD (with</p>	<p>1) Management Plans developed</p>	<p>1) Management and Monitoring plans in place</p>	

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	<p>minimum but not limited to:</p> <ul style="list-style-type: none"> - Waste Management Plan - Emergency Response Plan - Noise and Vibration Management Plan - Air Quality Management Plan - OCHS Plan - Community Health and Safety Plan - Spill Response Plan - Local Content Management Plan (local procurement and local employment) - Stakeholder Engagement Plan (update for the Operation phase) - Biodiversity Management Plan <p>These plans shall also cover the monitoring needs (as per monitoring frequencies indicated in the ESIA).</p> <p>2) Implement operational SEMP's and associated specific monitoring activities for monitoring the impacts against applicable national and international standards as identified in the ESIA (especially in the Environmental Monitoring Plan). The monitoring activities include but are not limited to:</p> <ul style="list-style-type: none"> - Ambient air quality (PM10, PM2.5, CO) - Day time and night time noise levels - Day time and night time vibration levels - Surface water quality (turbidity, pH, conductivity, total petroleum hydrocarbons, chemical oxygen demand) - Vegetation - Wildlife - Waste - Road accident statistics 	<p>measures included in the design for the measurable components</p>		<p>external support from Maintenance Contractor for instance)</p>	<p>before start of operations (before start of defects liability period)</p> <p>2) During all years of operations (see EBRD template for road projects monitoring)</p>	<p>2) Monitoring plans effectively implemented and monitoring reports submitted to EBRD</p>	

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PR2	Labour and Working Conditions						
2.1	<p><u>Human Resources (HR) Policy</u> Prepare and implement a Project HR Policy. HR document to cover all the issues associated with minimum wage, working hours, paid overtime, forced and child labour, equality and non-discrimination, employees' grievances, working condition, access to access to information about workers' rights, and freedom of association and collective bargaining. The HR Policy shall include a Code of Conduct.</p> <p>The HR Policy must be adopted also by subcontractors. Workers' rights and obligations have to be communicated to their staff and non-employee workers. Contractors and sub-contractors need to assign focal points for labour and working conditions.</p>	Effective HR management. Improvement of employer-worker relations	National legislation ILO Conventions EBRD PR2	Contractor to prepare and implement the HR Policy, and sub-contractors to adopt	Policy signed before start of recruitment Implementation throughout entire project lifecycle	HR Policy in place and officially handed over to subcontractors HR policy effectively implemented	
2.2	<p><u>Labour and Working Conditions Management Plan</u> Prepare and implement a Labour and Working Conditions Management Plan.</p> <p>Include provisions prohibiting forced/child labour in contracts of sub-contractors. Ensure it is subject to regular monitoring.</p> <p>Carry out a labour risk assessment of Contractor's contracting chains.</p>	Compliance to law and respect of workers' rights.	National legislation ILO Conventions EBRD PR2	Contractor (Engineer to monitor)	Preparation before start of recruitment Implementation throughout entire project lifecycle	Plan in place Plan effectively implemented Records of monitoring	
2.3	<p><u>Local workforce</u> 1) Include in the HR Policy indications aimed at increasing the use of local workforce (i.e. workforce coming from the Mtskheta-Mtianeti region). Include specific measures in Local Content Management Plan (e.g. advertising jobs locally, encouraging and attracting local workforce to apply for jobs and prioritising the hire of local workforce where reasonable</p>	Increase local economic benefits Improve relations with local communities	National legislation ILO Conventions EBRD PR2	1) Contractor 2) RD	Before start of recruitment Throughout entire project lifecycle	1) HR Policy and Plan in place addressing local workforce recruiting Report on employing local residents taking into account gender policy	

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	and practical, training programs) and monitor local workforce recruited. 2) Adopt and implement the Gender Action Plan developed with the assistance of ADB and participation of EBRD					2) Gender Action Plan implemented	
2.4	<u>Construction Worker Camp</u> For any temporary accommodation facilities (construction camps or private dwellings) provided by a Contractor or a subcontractor, ensure accommodation standards meet requirements of IFC/EBRD Worker Accommodation Guidance Note.	Ensure acceptable living conditions for workers	National legislation EBRD PR2	Contractor	Before start of camp construction (during pre-construction) Before start of construction	Plan and layout in place Accommodation camp developed in compliance with EBRD's Guidance Note	
2.5	<u>Workers' Grievance Mechanism</u> Implement and communicate to all workers the internal grievance procedure for workplace concerns. Ensure the mechanism is cascaded to non-employee workers.	Reduced risk associated with labour disputes	EBRD PR2	Contractor	Throughout project pre-construction and construction	Grievance mechanism effectively implemented and communicated	
2.6	<u>Independent audit</u> Conduct labour audit to certify compliance of Contractor's and sub-contractors' labour management practices.	Reduced labour risks	National legislation EBRD PR2	Engineer	Labour audit to be conducted twice: when main workforce is mobilized and at peak period (in terms of employment)	Results of Labour Audits	

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PR3	Resource Efficiency and Pollution Prevention and Control						
3.1	- Avoid pollution of watercourses	Preservation of water quality	EBRD PR3	Contractor	Throughout project pre-construction and construction	Results of Monitoring of water quality and biodiversity	
PR4	Health and Safety						
4.1	<u>Road safety and Tunnel Safety</u> Carry out a Road Safety Inspection (RSI) on Lot 1 tunnel 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.	Reduction of accident risks and improved road safety	National legislation EBRD PR4 Directive 2004/54/EC	RD	Before start of operations	RSI completed and eventual low-cost remedy measures in place	
4.2	<u>Security personnel</u> 1) Conduct checks for all security personnel to make sure they have appropriate licensing 2) All security staff need to be trained on Voluntary Principles on Security and Human Rights (VPSHR) as part of the induction.	Prevention of conflict between security personnel and local communities. Prevention of potential human rights violations by security personnel	EBRD PR4 and PR2	1)RD 2) Contractor	1) Prior to construction work (pre-construction) 2) During Construction	1) Copy of licenses 2) Training records for all security personnel	
PR5	Land Acquisition, Involuntary Resettlement and Economic Displacement						
5.1	<u>Land Acquisition and Resettlement Plan (LARP)</u> 1) Develop and disclose the LARP for Lot 1 before the start of the civil works for this lot. 2) Ensure LARP Lot 1 is implemented section by section, and verified through the approval of LARP	Compliance with legislation. Relations with local community.	National legislation EBRD PR5	RD	1) Throughout project pre-construction and construction 2) Before the	1) LARP finalised and effectively implemented 2) Completion Audits (one by section) performed by an	

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	<p>Completion Audit (by section) before Contractor's access to site. A section cannot be accessed if the resettlement has not been fully implemented for this section and confirmation received through the LARP Completion Audit.</p> <p>3) Ensure that livelihood restoration measures are implemented (long term).</p>				<p>start of pre-construction, section by section</p> <p>3) Pre and post displacement (duration subject to monitoring outcomes)</p>	<p>Independent LARP Compliance Consultant, submitted by RD for EBRD approval</p> <p>3) Demonstration of implementation of the livelihood restoration measures</p>	
5.2	<p><u>Land acquisition for spoil areas, construction camps, concrete yards and asphalt plants</u></p> <p>Any temporary impact caused by the use of land for camp or as a temporary disposal area, will be regulated by private agreements between the Contractor and the land owners. The willing seller/willing buyer principle will apply.</p>	<p>Compliance with legislation.</p> <p>Relations with local community.</p>	<p>National legislation</p> <p>EBRD PR5</p>	Contractor	Before the start of spoil areas use	Evidence that willing seller/willing buyer principle was followed.	
5.3	<p><u>Regular monitoring of the LARP implementation</u></p> <p>Regular independent audits for the monitoring of correct implementation of the LARP shall be carried out by an Independent Consultant</p>	<p>Compliance with LARP, national legislation and EBRD requirements.</p>	EBRD PR5	RD	As per LARPs requirements	<p>Independent LARP Compliance Consultant appointed and ToR agreed with EBRD</p> <p>Monitoring reports shared with EBRD</p>	
5.4	<p><u>Post implementation evaluation</u></p> <p>Prepare and submit Post Implementation Evaluation Report at the end of the project for EBRD approval: the post-implementation evaluation will be carried out after all project construction activities are fully implemented (or when Livelihoods Restoration Plan is fully</p>	<p>Monitoring of results of LARP implementation</p>	EBRD PR5	RD	After completion of the project	<p>ToR agreed with EBRD</p> <p>Completion Audit Report submitted for EBRD approval</p>	

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	implemented).						
PR6 Biodiversity and Living Natural Resources							
6.1	<p>Spring surveys</p> <p>The ESIA identified the need for further studies in advance of project construction commencing. In addition to the pre-work surveys mentioned below and in the EMP, biodiversity field surveys will be conducted as part of the ESIA baseline during the spring, to cover seasonal variation.</p>	Biodiversity baseline covering seasonal variation	EBRD PR6	RD	Spring 2019	ToR agreed with EBRD Report provided to EBRD and integrated to the ESIA package	
6.2	<p>Biodiversity Action Plan (BAP) and Biodiversity Monitoring and Evaluation Plan (BMEP)</p> <p>1) Develop and implement a detailed BAP including (as appropriate) species-specific BAPs, with the objective to ensure that “no net loss” and where appropriate “net conservation gain” for the concerned PBF and CH is achieved. BAP should be developed in consultation with stakeholders, including government, external experts, local/international conservation organisations and project-affected communities.</p> <p>2) The Biodiversity Monitoring and Evaluation Plan (BMEP) will define precise actions to be implemented during construction and the first years of operations, to ensure the objectives defined in the BAP are met.</p>	Avoidance of biodiversity loss and protection of Critical Habitat (CH) and Priority Biodiversity Features (PBF)	EBRD PR6	Biodiversity Action Plan: RD (with Consultant support if needed) Biodiversity Monitoring and Evaluation Plan (BMEP): Engineer	Both Plans approved before start of construction Biodiversity Monitoring and Evaluation Plan (BMEP) implemented BAP implemented throughout project life, in order to meet the no net loss long term objective, and updated as appropriate	1) BAP in place and implemented 2) Biodiversity Monitoring and Evaluation Plan (BMEP) in place and implemented	
PR7 Indigenous People							
7.1	The PR7 is not applicable as no indigenous people are present in the project area.						

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PR8	Cultural Heritage						
3.1	<u>Cultural Heritage Mitigation Measures</u> Implement the mitigation measures planned for Cultural Heritage and included in the EMPs.	Reduction of risk of impacts on known cultural heritage	National legislation EBRD PR8	Contractor	Throughout entire project lifecycle	Mitigation measures effectively implemented	
3.2	<u>Chance Find Procedure</u> Adopt and fully implement the Chance find procedure described in the EIA and in the EMPs (including onsite monitoring during ground clearance works).	Preservation of cultural heritage	National legislation EBRD PR8	Contractor	Throughout entire project lifecycle	Procedure adopted before start of construction Procedure effectively implemented in case of findings	
PR10	Information Disclosure and Stakeholder Engagement						
10.1	<u>Stakeholder Engagement</u> 1)Assign a communication specialist responsible for the implementation of Stakeholder Engagement activities with adequate competence. 2)Fully implement the Stakeholder Engagement Plan (SEP) including the disclosure requirements, and ensure that it is kept up to date periodically or whenever necessary.	Information dissemination and continuous engagement with affected stakeholders.	EBRD PR10	RD	1)As soon as possible 2)Throughout entire project lifecycle	1)SEP implementation responsible appointed 2)SEP fully implemented	
10.2	<u>Community Liaison Officers (CLO)</u> Assign Community Liaison Officers responsible for the implementation of SEP at the level of project site(s)	Improved relations with local communities	EBRD PR10	Contractor	Prior to the start of construction	Regular reports on implemented SEP activities	
10.3	<u>Grievance Mechanism for communities</u> Implement and communicate the Grievance Mechanism for project concerns and specifically for land acquisition and resettlement issues. The mechanism for reporting back to affected people on the results of grievance management and responses should be included.	Improved relations with local communities Insurance that grievances are dealt with properly	EBRD PR5 and PR10 EBRD Guidance Note on Grievance Management	RD and Contractor	Throughout entire project lifecycle	Grievance mechanism effectively implemented and communicated	

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10.4	<p><u>Grievance Redress Committee and Commission</u> Support the activities of this existing Committee by ensuring that it is operational and adequately address the grievances received throughout the project lifecycle.</p>	<p>Improved relations with local communities Insurance that grievances are dealt with properly</p>	<p>EBRD Resettlement Guidance and Good Practice National legislation EBRD Guidance Note on Grievance Management</p>	RD	Throughout entire project lifecycle	<p>Committee and Commission operational throughout project lifecycle During Construction: quarterly reports on grievances received and resolved During Operations: annual reports on grievances received and resolved</p>	