Ref.	Phase	Commitment	Topics	Responsibility	Source Document	Management Plan Reference	Project Worksite
0	1	2	3	4	5	6	8
1	Construction	•Maintain a Project mandatory 250m buffer zone between temporary construction compounds (laydown, waste, parking area, stockpiles) and the L-S Protected Area •Construct new road sections following site clearance and stockpile management requirements, including ensuring any stockpiles are covered to minimise dust events. •Excavation, handling and transport of erodible materials shall be avoided under high wind conditions where practicable. •Use water (from a sustainable source) or other control measures such as chemical bonding agents or aggregate to control dust. •Demarcate delivery roads and access tracks at site and ensure all workers stick to demarcated areas. •No plant or equipment to be stored less than 250m from the L-S Protected Area •No onsite cement batching - use existing concrete batching plants in the local area for cement production or use pre-cast concrete blocks	Air emissions Construction dust	EPC contractor	ESIA 2024	Pollution Prevention & Control Plan	Site Construction Laydown Area Temporary Access Roads
2	Construction	Mitigation of impacts in relation to generation of dust and vehicle / machinery emissions will be managed through the development of the CESMP and CTMP for the construction phase which will specify appropriate measures for the management of dust and fugitive emissions: •Construction Traffic Management Plan (CTMP) to incorporate all relevant mitigation measures for vehicle movement nearby and within the project areas •Minimise open excavation areas •Minimise stockpiling of soil and earthen material through coordination of earthworks and excavation activities (excavation, grading, compacting, etc.); •materials will be transported in conditions that ensure this by wetting the material, covering it, using trucks with buckets/containers suitable for the type of material transported, etc. •Powdery construction materials will be handled in such a way as to reduce the level of particles that atmospheric currents can carry to a minimum. •The activities of loading/unloading means of transport, which generate dust in periods of strong wind, will be avoided. •Implement dust suppression techniques, such as applying water to dusty areas (e.g., site, access road, etc.) through water spraying tanks; •Minimise vegetation clearance (when is possible) to reduce exposure of bare soil, and revegetate cleared areas as soon as possible; •For stockpiles left for long periods, apply grass seed or other covers; •Burning of any material anywhere on construction sites is banned; •Restrict vehicle speeds on construction sites and all access roads to minimize potential generation of dust; •Vehicles carrying aggregate material and workings will be sheeted at all times; •Maintaining cleanliness by removing dust from machines and vehicles must be a daily practice (sprinkling, vacuuming, cloths). •Conduct periodic checks, according to the legislation in the field, for the machines and means of transport involved in the construction works, so that they are in good technical condition and do not emit exhaust gases beyond the permitted limits. •All construction machinery and equipment to be maintained in good working order and not left running when not in use; •Use modern machines and equipment, which respect the EURO standards regarding the construction of new engines, respectively the emission control systems, considering the global trend of manufacturing engines with low fuel consumption on power unit and restrictive emission control. •Following the periodic checks regarding the level of carbon monoxide and the concentrations of emissions in the exhaust gases, if there will be excesses of the allowed indicators (exceeding the limits approved by the technical books of the machines), they will be stopped and put in function only after remedying any defects. •Judicious organization of construction activities, respecting the planned program and updating it as necessary, depending on the specific situations that arise, will allow the flow of traffic and avoid overcrowding of means of transport and equipment in the organization of the construction site. •The work areas and the duration of the works will be limited. •The site organization will respect the perimeter allocated by the project. •If any complaints or grievances are received from local community, investigate complaint and take action to remediate or clean up impacted receptor and take measures to reduce dust generation.	Air emissions Construction dust	EPC contractor	ESIA 2024	Pollution Prevention & Control Plan	All Project Worksites
3	Operation and maintenance	•To reduce the impact on the air environment factor, the following general measures will be taken, considering that the operational project does not pose any risks associated with emissions to air: •Periodic checks will be carried out on machinery and road/site vehicles so that they are in good technical condition and do not emit exhause gases beyond the permitted limits •Waste will be stored in specially arranged places for the shortest period of time •Exploitation roads will be maintained •Maximum travel speeds of vehicles used in maintenance will be imposed •Planning and complying with the maintenance and operation plans of the PV plant, carrying them out in a safe manner.	Air emssions	Projecy owner/ O&M contractor	ESIA 2024	OESMP	Project site
4	Design/Contract/ Construction	•All equipment to have a noise level of less than 85dB(A) at 1m from the equipment. •Reduce project traffic routing through community areas wherever possible (consider exclusion of Access option 3) •Baseline noise assessment and access point at representative receptors in Polkovnik Lambrinovo and along R218	Noise	Project owner	ESIA 2024	Pollution Prevention & Control Plan	All Project Worksites

	Construction	•No noisy or high-noise activities are to be undertaken outside regular working hours (7 am to 6 pm) without prior approval of the Project Company. •Locate all equipment and laydown area at least 250 m from any sensitive receptors (specifically). •All observations and non-conformances will be managed through a corrective action tracker and reviewed weekly. and L-S Protected Area. •No blasting without prior approval of the Project Company. •Equipment maintenance, and noise/ vibration emissions and monitoring during construction will be managed through the development of a robust Construction Environmental Management Plan (CEMP). The mitigation measures for noise impacts will include, as a minimum, the following: •Adhering to a speed limit of 15-20km/h for trucks on the construction site •Development of the CTMP (see mitigation measures propose for traffic management); •Taking advantage of the natural topography as a noise buffer during facility design •Temporary acoustic screening if required; installing acoustic enclosures for equipment casing radiating noise •Select equipment with lower sound power levels •Install suitable mufflers on engine exhausts and compressor components •Install vibration isolation for mechanical equipment •Avoid simultaneous work activities that generate high levels of noise/ vibration emissions; •Prior notification of local residents in case of important work activities that generate noise and/or vibrations; •Restriction of construction activities to daytime hours and weekdays; •Limiting the hours of operation for specific pieces of equipment or operations, especially mobile sources operating through community areas •Developing a mechanism to record and respond to complaints •Monthly noise measurements of the noise level at the nearest sensitive receivers will asist in demonstrating compliance of construction activities with required noise levels. The noise level will be measured near the nearest house or other sensiitive receptor in Polkovnik Lambrinovo (minimum of 2 points) and at the access road of the PV plant from road 218 during the material transport activities and compared to the admissible limits. •Monitor the grievance log for noise-related complaints. •Conduct noise monitoring in case of a noise complaint or evidence of exceedance of community noise guidelines values.	Noise	EPC contractor	ESIA 2024	Pollution Prevention & Control Plan	All Project Worksites
5							
	Construction	Mitigations to address soil compaction and erosion: •Sites/vegetation clearance, sites preparation, excavations, and improvement of existing roads and construction of additional access roads should not be carried out during periods of torrential rain or storms and heavy wind, to minimize compaction and erosion; •Grade temporary access roads so their slope is not too large to avoid the build-up of fast-running run-off water during extreme precipitation events. •Rehabilitation interventions in the priority areas (i.e. areas where there is a low likelihood of natural revegetation or where areas are prone to compaction and erosion from surface runoff) should be prioritised; •The top layer of fertile soil should be removed (where possible) during construction works and stored. Topsoil stripping is usually done by removing the upper layer of the soil up to 2m. •The topsoil will be stored and used to rehabilitate affected construction areas. The topsoil stockpiles' height should not exceed 2m. •Should compaction and erosion events be identified, appropriate remedial actions, including restoration of the compacted and/or eroded areas, and where necessary, the relocation of the paths causing the compaction and/or erosion, should be undertaken, •Land/vegetation clearance should only be undertaken immediately prior to construction activities taken place there, •Unnecessary land/vegetation clearance should be avoided •Minimise unnecessary soil/vegetation disturbance during construction. •Use only demarcated areas for laydown and access (construction and operation) •Minimise trenches or other steep-walled excavations •Backfill open excavations as soon as possible after construction activity •The footprints for all construction sites and areas for associated facilities/infrastructure (e.g. borrow and disposal areas, lay-down areas, construction/management sites and temporary offices) should be restricted to minimum feasible extent with measures implemented to avoid footprint creep, •Unless foreign material, such as aggregate (e.g. crushed stone, ballast, gravel, sand), needs to be inserted, after the installation of features requiring the excavation of a deep holes, soil should be replaced in the holes so as to mimic the pre-construction profile. •Adopt tension stringing technique to avoid impact on soils between the towers and stringing points. •Confine traffic movement to existing roads/tarmac areas within the PV Site. •Immediately restore the topsoil and vegetative cover using seeded restoration techniques for all already disturbed areas (where work is not planned) in the PV Site.	Geology and soil	EPC contractor	ESIA 2024	Topsoil Management and Site Reinstatement Plan	Site Construction Laydown Area Temporary Access Roads
6							

	Construction	Mitigations to addresss soil contamination: •Contract a licensed contractor to collect, transport and treat domestic, construction and hazardous wastes from Project sites, •Prohibit dumping any types of solid waste to the soil, or burning waste of sites, •Ensure that hazardous materials are stored in designated areas that are designed with impermeable floor, inflammable walls and accessible to authorized personnel, •Hazardous waste shall be properly managed in accordance with existing legislation on hazardous waste •Maintenance works are restricted to specially designated platforms with strict control of accidental spills, •Procedures for responding to emergencies / accidental spills of hazardous materials, fuel and handling, and waste management are developed and implemented, •In case of accidental/unintended spillage, the contaminated soil should be immediately collected and stored as hazardous waste. •Oil interceptors and silt traps shall be implemented to manage and retain sediments on site for surface water runoff. •Spill containment and clean-up kits will be available on-site, and clean-up from any spill shall be appropriately contained and disposed of at a bound landfill site. •Preparation of guidelines and procedures for immediate clean-up actions following any oil, fuel or chemical spillages. •Develop a site-specific Emergency Response Plan for soil clean-up and decontamination. •Implement a training program to familiarize staff with emergency procedures and practices related to contamination events. •Develop and implement a waste management plan (as part of the cESMS) to ensure that waste is disposed of correctly such that soil contamination is minimized. •Bund of areas where hazardous substances are stored (e.g., fuel, waste areas). •Fuel, oil, and used oil storage areas shall be contained in bunds of 110 per cent capacity of the stored material; •Refuelling shall be carried out in designated areas using strict protocols •Construction vehicles/pieces of machinery and equipment shall be serviced regularly at off-site locations; •Ensure that all construction plant and equipment are maintained in a good state of repair with minimal leaks; •Ensure storage areas have impermeable floors and containment of capacity to accommodate 110% of the volume of the largest waste container; •Rehabilitation and re-vegetation of cleared areas adjacent to the project development area. In addition, after completion of construction, all the temporary roads and embankments will be reinstated, lands will be re-cultivated, and the micro relief will be reproduced. •Adequate sanitary facilities should be provided for the construction workforce. One mini toilet is recommended for every seven workers and not less than 1:15 workers. •Licensed companies shall be contracted to manage and dispose of wastes, wastewater and sludge from the septic tank.	Geology and soil	EPC contractor	ESIA 2024	Pollution Prevention & Control Plan; Waste Management Plan	Site Construction Laydown Area Temporary Access Roads
7							
	Pre-construction	•Ensure all compensation is paid prior to commencement of construction activities	Land Use	Project owner	ESIA 2024	Compensation records	Poject
8							
	Construction	•Activities within the perimeter will be carried out on strictly necessary areas provided by the project, without occupation of additional land. •Construction equipment and means of transport will only transit the areas provided by the project, on well-established routes, without affecting additional land surfaces. •Materials, raw materials and/or waste warehouses will not be set up in the vicinity of the locations, on other surfaces than those provided by the project (existing project boundary). •The technological processes that produce a lot of dust, such as the case of earth fillings, will be reduced in periods of strong wind or a more intensive wetting of the surfaces will be carried out, to avoid affecting the use of the neighbouring lands. •Waste will be temporarily stored strictly in the areas provided by the project, until it is handed over to specialised companies in order to take over the waste from the site - this will ensure waste generated by way the project will not adversely impact areas outside the site. •After completion of construction works, the contractor will sanitise and restore all the surfaces used for any purpose during the works, in a way that meets the environmental protection measures. Thus, areas temporarily removed from agricultural use will be returned to agricultural use after completion of construction. •Upon the completion of construction activities, fully reinstate leased land and ensure it is handed over in its original conditions, to the extent possible	Land Use	EPC contractor	ESIA 2024	Pollution Prevention & Control Plan	All Project Worksites
9							

Construction/ operations	Mitigation measures to address impact on water quality (groundwater and surface water resources): •Prohibit groundwater for potable or construction-related purposes. •Ensure the drainage system includes a containment system for collecting intermittent contaminated wastewater streams, from abnormal operating scenarios or during wet cleaning of panels (maximum of 4 times per year). •Portable latrines or septic tanks are to be installed at least 250 m away from the site boundary (in particular, in the northwest of the site near the L-S Protected Area). •All concrete will be delivered to the site pre-mixed or pre-cast from third parties with approved water use licences •Undertake groundwork to ensure appropriate site drainage (avoiding contamination runoff risk). •Undertake due diligence of the WWTP in Silistra for alignment with GIIP •No storage or laydown areas within 250m of the L-S Protected Area boundary or off-site residential receptors •Install sediment traps and culverts as part of the drainage infrastructure around the Project sites prior to clearance and earthorks, so as to prevent any sediment run-off into the surrounding area. •Provide culverts along new access roads to facilitate drainage along with ditches. Where practical, exposed surfaces and friable materials should be covered. •Provide sufficient toilets at active work areas for staff and workers and these should be serviced regularly by a competent and suitably qualified person. •Contractors and applicable Project staff should be trained regarding proper methods for transporting, transferring and hazardous substances that have the potential to impact water resources. •Areas where spillage of contaminants occurs should be excavated (to the depth of contamination) and suitably rehabilitated. If any other minor spillage occurs, it should be cleaned immediately, and the contaminated area should be rehabilitated. •The washing of Project vehicles in any surface water bodies in and around Project site(s) will be strictly prohibited. All Project vehicles should be washed at designated washbays on site/s. These wash bays will include oil/grease and sediment traps for grey water. •Undertake concrete washout in designated and signed areas to prevent leaks or spread of wastewater. •Construct the concrete washout area and maintained it in sufficient quantity and size to contain all liquid and concrete waste generated by washout operations. •The concrete washout area will have an impermeable surface with dedicated drainage systems. •Undertake the removal of any sludge residues as solid hazardous waste only by a licensed waste/wastewater contractor and handle as a hazardous waste. •Prevent any ad-hoc maintenance of vehicles/equipment in and around the Project site(s). All vehicles/equipment should be maintained at a designated workshop. The workshop will include an oil/grease trap. •Maintain all active work areas in a good and tidy condition; debris and waste should be contained in such a way that they cannot become entrained into surface run during periods of heavy rain. •Management of sewage shall be by a licenced contractor. •Provide hazardous waste storage areas with secondary containment. Moreover, hazardous waste should be stored in sealed/covered containers to prevent rainwater intrusion. •Provide all dangerous and hazardous material stores and handling areas with secondary containment capable of holding 110% of the total capacity of all tanks/vessels. •Confine the loading and unloading of dangerous and hazardous material to areas that are provided with secondary containment and in line with hazardous material handling procedures.	Groundwater and surface water	EPC contractor	ESIA 2024	Pollution Prevention & Control Plan	All Project Worksites
10							
Construction	•Develop and implement a grievance procedure in the event of any water reduction and subsequent water availability complaints being received.	Groundwater and surface water	Project owner	ESIA 2024	Stakeholder Engagement Plan	All Project Worksites
11							
Construction	EPC contractor will develop a Wastewater Management Plan in compliance with Bulgarian legislation, IFI Requirements and GIIP (Good international industry practice) that will also include measures to ensure: •The construction contractor must ensure that the temporary offices have adequate wastewater handling and disposal facilities. Their disposal must be made in close collaboration with the local government authorities (i.e., municipalities) and licensed companies. •Excavation must not occur in extreme weather conditions (rain, strong wind). •Prohibited to discharge of the resulting water during the construction period, on the ground, on the site or in the vicinity. •The removal of the oil products accidentally leaked from the machines in operation will be carried out using absorbent materials that will then be stored in specially arranged spaces and handed over to the authorized units for collection and/or disposal. •The handling of materials or other substances used in technologies will be carried out in such a way as to avoid their dissolution and entrainment by precipitation waters. •Equipment and means of transport will be periodically checked to avoid the possibility of accidental leaks due to their defects. •The storage of materials within the organization of the construction site must ensure the security of the warehouses and adequate and efficient handling, all this to avoid losses and accidental pollution. •Washing of means of transport and equipment will be done exclusively in areas specially arranged for such operations. •Avoidance of refuelling on site to prevent oil spills. If this is not possible, procedures will be developed to avoid accidental spillage, like providing drip trays and bunding for storing fuel and waste chemicals/ substances. In case of accidental leakage of petroleum products, absorbent substances will be applied immediately. •Responsible storage and disposal of liquid effluents such as sewage from temporary accommodation using certified disposal companies. •Intermediate warehouses of bulk construction materials, which can be washed away by rainwater and can pollute the soil, subsoil and underground water, must be stored in closed or covered spaces; the materials will be transported in conditions that limit the pollution of the atmosphere by sprinkling the material, covering it, using trucks with buckets/containers suitable for the type of material transported, etc. •The work schedule must prevent the overloading of the site with materials, as well as the too-long storage of material stocks on the site. •Technology for executing the project's objectives will be respected, taking measures to prevent and combat accidental pollution. •Comply with the environmental and execution conditions of the works imposed in the project for the execution of the works. •Good general housekeeping. •Conduct continuous training and education awareness of all project employees regarding waste management practices to avoid reducing the risks of waste generation and potential impact during the construction phase.	Wastewater	EPC contractor	ESIA 2024	Waste Management Plan	All Project Worksites
12							
Design/ construction	•Project contracts to obligate the Project PV panel suppliers to remove panels for recycling •Identify recycling options for waste, such as any electric waste, broken PV panels/modules, packaging waste, etc., through authorized/ licensed waste management companies. •Ensure selected PV modules include all costs for returning and decommissioning PV panels (intermittently during operation and end of life). •Prohibit the following materials in the EPC Contract / Procurement Policy o Asbestos o PCB containing materials o Lead-based paints o Pesticide, herbicides as defined under the Stockholm Convention	Solid waste	EPC contractor	ESIA 2024	Waste Management Plan	All Project Worksites
13							

	Construction	•Develop a construction site Waste Management Plan (as part of the cESMS) •Require EPC contractor to conduct a duty of care audit for proposed general waste, construction waste, hazardous waste and recycling facilities in the municipality and region to confirm compliance with GIIP for acceptance by the Project Company. •EPC contractor to ensure all subcontractors use approved waste disposal routes only following the outcomes of the waste due diligence audits. •Site all temporary onsite waste storage areas at least 200 from the L-S Protected area	Solid waste	EPC contractor	ESIA 2025	Waste Management Plan	All Project Worksites
14							
	Construction/ operation	The EPC contractor and O&M contractor will develop a Waste Management Plan appropriate to the project stage in compliance with Bulgarian legislation, IFI Requirements and GIIP that will also include measures to ensure: •Offices have adequate waste handling and disposal facilities. Arrangements for collecting non-hazardous and hazardous wastes must include on-site waste bin equipment provisions. Waste bins are recommended to be segregated according to the waste stream, e.g., organic, hazardous, paper/cardboard, plastic, and metallic waste. Their disposal and recycling must be made in close collaboration with the local government authorities (i.e., municipalities) and licensed waste recycling companies. Provision of chemical/ mini toilets for workers at the base camp must be in the ratio of 1:7 and maximum of 1:15 (toilet to workers), respectively, to maintain hygienic and clean surroundings. •Food/organic waste and recyclables, such as paper, plastic, scrap metal waste, etc. must be appropriately segregated and stored in designated waste bins/containers and periodically deposited in approved disposal areas or sold to licensed recycling companies. •Ensure electrical waste (consumables, spare parts and obsolete equipment) and broken solar panels are adequately packed and sent back to the manufacturer or reused in other forms and locations; •Segregation, reuse and, where feasible, recycling of wastes by registered operator; construction contractor must follow the 3R policy to manage the solid wastes •Waste storage/collection areas shall be fenced, laid at the bottom with an impermeable cover and equipped with relevant signage (e.g., urban waste collection area); any waste fuels/oils or chemicals that may need to be temporarily stored on site will be contained within solid impermeable bunding with 110% capacity of storage containers, to avoid contamination of soils, surface and groundwater in the event of spillage/leakage. •Avoidance of refuelling on site to prevent oil spills. If this is not possible, procedures will be developed to avoid accidental spillage, like providing drip trays and bunding for storing fuel and waste chemicals/ substances. •Good general housekeeping. •Covering of solid waste containers to prevent windblown litter across and outside site. •Composting of organic wastes. •Appropriate handling and storage of hazardous and non-hazardous waste for licensed collection for responsible disposal by registered operator; In each case, the entity/company that will transport or transfer the waste shall be equipped with a proper license , according to national laws. •Generated waste quantities - must be recorded in a separate/dedicated register according to the type of waste and the quantities generated. During the waste transfer process, a waste transfer format (Waste Transfer Format) shall be filled out to determine the respective quantities according to the type of waste leaving the site and the name of the company/entity that will handle these wastes. These data shall be regularly kept by the Contractor during the construction activity, and presented/reported to the government authorities if required; •Conduct continuous training and education awareness of all employees of the project in regard to waste management practices in order to avoid, reduce the risks of waste generation and potential impact during the construction phase •Store any generated medical waste in appropriate medical waste containers. •Handle all medical waste only by trained personnel. •Conduct the removal of any medical waste from the site for appropriate treatment, disposal/incineration will only by a licensed contractor.	Solid waste	EPC contractor	ESIA 2026	Waste Management Plan	All Project Worksites
15							
	Construction	•In-situ testing of soil to ensure it is not contaminated and can be reused or disposed into land. •Training – contractor staff to be able to identify signs of potential contamination (smell of HC, staining).	Solid waste	EPC contractor	ESIA 2024	Construction Waste Management Plan	All Project Worksites
16							
	Construction	•Implement relevant construction standards (e.g. 'Construction Code of Practice for the Sustainable Use of Soils on Construction Sites' – DEFRA, 2009). •Demarcate the construction zone or servitude for the TL corridor on a map and on the ground clearly using high visibility tape for instance, to avoid impacting on sensitive areas outside of the permitted construction area •Avoid locating construction camps and material/equipment laydown areas within or near identified natural or semi-natural habitat •Utilise existing roads wherever possible	Designated and protected areas	EPC contractor	ESIA 2024	Biodiversity Management Plan	All Project Worksites
17							
	Pre-construction	•Prior to financing, conduct Critical Habitat Assessment for potential critical habitat triggers (e.g. based on CH criteria i, v, vi per EBRD PR6) for the potential trigger species highlighted in the ESIA •Design where possible lighting that is activated to work only during movement and the emitted light should be outside the ultraviolet spectrum if possible - for some types of insects, amphibians and reptiles, this can reduce their barrier effect or disorientation in space. For nocturnal birds of prey, it will reduce the element of anxiety •Before the start of construction and during all stages of the construction, a team of environmental biodiversity experts must be present to the territories and, if necessary, remove amphibians or reptiles from the areas intended for construction, in accordance with the construction scheme. Thus, the probability of mortality of individuals will be significantly reduced.	Habitats Habitat loss / degradation / fragmentation	Project owner/EPC contractor	ESIA 2025	CHA report	Site
18							

	Construction	•Worker/contractor training/awareness, supervision regarding impacts to animals and protection of species •Prohibit poaching and interactions with fauna and flora in the worker code of conduct •Avoid locating construction camps and material/equipment laydown areas within or near identified natural or semi-natural habitat •Develop a suitable post-construction habitat restoration plan for temporary areas used during construction •Use existing access roads or upgrade existing roads wherever possible before considered new access road construction •Place appropriate limits on the number of vehicle movements to and from the Project site •Restrict vehicles to the use of authorized access roads only •Prohibit the use of herbicides to limit the spread of grass, tree and shrub vegetation in PP areas - this will limit possible negative effects on insects, amphibians and entrants, such as mortality or possible disease •Where possible, storage of materials should only be in areas around the airport runway - this will lead to limiting effects of temporary soil damage and reducing the area for reproduction, development and foraging in most animal groups and will reduce unnecessary trampling of territory and changes in mechanical composition which is important to invertebrates •During construction, minimise impacts such as trampling, passage of heavy equipment and storage of materialss as this limit disturbances, reduces affected areas and limits potential deaths of individuals (plants, invertibrates, small mamals, amphibiansetc), i.e. the impact on species will be limited to the areas of construction and will not cause adverse impacts over larger areas. •All activities should be carried out only during the daylight hours to reduce the anxiety of nocturnal animals. •In the event that a fence is installed - provide access areas/passages through which rabbits, foxes, jackals, land turtles and other small species can pass. The size of the opening must be not less than 40/40 cm for every 100 linear meters of length of the fence along its entire perimeter. •Reduce the speed limit of equipment and personnel vehicles to 20 km/h within the Lambrinovo airport's runway and road areas will significantly decrease the risk of amphibians, small mammals, and invertebrates being run over. •Establishment, posting, and enforcement of vehicular speed limits, and other traffic management measures. •Implement good housekeeping measures for materials handling and waste management •Prepare decommissioning management plan (including management of biodiversity impacts) prior to decommissioning.	Habitats Habitat loss /degradation / fragmentation -General provisions	EPC contractor	ESIA 2025	Biodiversity Management Plan	All Project Worksites
19	Construction	•Apply a rotation scheme on small areas moving from east to west to remove vegetation around the PV facilities - panels, inverters and others in accordance with the instructions of an ecologist/biologist, as a result of monitoring (before starting removal activities of vegetation). This will enable species from the groups of amphibians, reptiles, mammals and partially from invertebrates to move to neighbouring territories and limit disturbance and possible mortality.	Habitats Habitat loss / degradation / fragmentation	EPC contractor	ESIA 2026	Biodiversity Management Plan	All Project Worksites
20	Construction	•Check for introduction of species included in the list of invasive and potentially invasive alien species (of higher plants for Bulgaria, indicator SEBI10 - Invasive alien species for Europe (source EAES http://eea.government.bg/bg/soer /2010/biodiversitv-nem/biologichno-raznoobrazie-natsionalna-ekologichna-mrezha-1) •Compile a suitable invasive alien plant (IAP) species control plan and programme to manage IAP's within the control of the development •Implement IAP species surveillance and control plan within areas in the projects control, focusing particularly on areas of natural habitat •Monitor IAPs to inform further management intervention	Habitats Introduction/spread of invasive species	Project owner/EPC contractor	ESIA 2024	Invasive Species Management Plan	All Project Worksites
21	Construction	•Implement buffer zones or exclusion areas around important nesting or foraging sites to minimize disturbance •Avoid site clearance during the bird breeding season. Where not, use ecological clerks of works (ECoW) to identify nests and avoid until young have fledged •Implement construction practices that minimize noise and vibration disturbance, such as scheduling activities outside sensitive bird breeding periods or using noise barriers •Avoid site clearance during the breeding season. Where avoidance is not possible, use (ECoW) to prepare the environmental documentation on delivery of ecological requirements on site before construction activities commence in order for contractors to meet key development milestones; The ECoW will monitor that site based construction activities are delivered in accordance to relevant laws and Project commitments;	Birds Habitat loss /degradation / fragmentation	Project owner/EPC contractor	ESIA 2024	Biodiversity Management Plan	All Project Worksites
22	Construction	•Install fence and mark work areas to minimise effects of vegetation clearance on birds.	Birds Direct Mortality Installation of overhead transmission lines and pylons	EPC contractor	ESIA 2024	Biodiversity Management Plan	All Project Worksites
23	Construction	•Conduct thorough surveys to identify and protect nesting sites before construction begins. Implement buffer zones around active nests and restrict construction activities within these areas during breeding season •Fit suitable bird diverters at 5m intervals on OHTL •Install insulation, covers, and other avian protection devices on electrical equipmenton OHTLs to prevent perching and contact. Regularly inspect and maintain the electrical infrastructure to ensure its effectiveness in mitigating electrocution risks.	Birds Installation of overhead transmission line and pylons	Project owner/EPC contractor	ESIA 2024	Biodiversity Management Plan	All Project Worksites
24	Pre-construction	•Conduct pre-construction checks for presence of bat roosts near construction sites •Implement noise reduction measures to minimize noise-related disturbance near bat roosts •Control of lighting to prevent light spill outside of construction areas through use of directional cowls	Bats Habitat loss /degradation / fragmentation	Project owner/EPC contractor	ESIA 2024	Biodiversity Management Plan	All Project Worksites
25	Construction and operation	•Establishing buffer zones around bat roosts •Adjust construction schedules to avoid sensitive periods •Implement proper lighting protocols to minimize disturbance	Bats Direct mortality	Project owner/EPC contractor	ESIA 2024	Biodiversity Management Plan	All Project Worksites
26	Construction and operation	•In the areas where no PV installations are constructed, but are part of the plant's service areas, grass and shrub vegetation should not be removed or should be revegetated. This will enable these areas to serve as temporary and permanent refuges for amphibians, reptiles, mammals and invertebrates •Prohibit the use of pest control measures (rodenticides) to limit the population of rodents - it will cause unwanted mortality among rodents, but also re-poisoning of predatory mammals or birds.	Mammals Habitat loss /degradation / fragmentation. Direct loss of species	Project owner/EPC contractor	ESIA 2024	Biodiversity Management Plan	All Project Worksites
27	Construction	•Establish exclusion zones or limiting construction activities in close proximity to active burrows •Use noise barriers and mufflers on construction equipment when woprking near active burrows	Mammals Noise and vibration	EPC contractor	ESIA 2024	Pollution Prevention and Control Plan	All Project Worksites
28	Construction	•Implement a relocation plan. This involves capturing and translocating reptiles to suitable habitats away from the construction zone, ensuring their safety;Implement measures to avoid disturbance ofburrows or resting places such as set back distances or timing of works	Mammals Habitat loss /degradation / fragmentation	EPC contractor	ESIA 2024	Biodiversity Management Plan	All Project Worksites
29							

	Construction	•Implement strict noise and disturbance control measures during construction phase. This includes limiting construction activities during sensitive periods	Mammals Habitat loss /degradation / fragmentation Noise	EPC contractor	ESIA 2024	Biodiversity Management Plan	All Project Worksites
30							
	Construction	• Before the start of construction and during all stages of the construction, a team of environmental biodiversity experts must be present to the territories and, if necessary, remove amphibians or reptiles from the areas intended for construction, in accordance with the construction scheme. Thus, the probability of mortality of individuals will be significantly reduced. •Establish buffer zones and construction exclusion zones around sensitive herpetofauna habitats to minimize disturbance	Herpetofauna Habitat loss /degradation / fragmentation	EPC contractor	ESIA 2024	Biodiversity Management Plan	All Project Worksites
31							
	Construction	•Implement noise and vibration mitigation measures such as limiting noisy activities during sensitive periods (e.g., breeding season) and use equipment with noise reduction technologies.	Herpetofauna Noise and Vibration Disturbance	EPC contractor	ESIA 2024	Biodiversity Management Plan	All Project Worksites
32							
	Construction	•Establish avoidance and exclusion zones around known reptile habitats to minimise risk of direct impacts. Clearly mark and communicate these zones to construction personnel to ensure compliance; •Implement a relocation plan. This involves capturing and translocating reptiles to suitable habitats away from the construction zone, ensuring their safety; •Provide comprehensive training to construction workers and equipment operators on reptile conservation and the importance of implementing mitigation measures	Herpetofauna Direct loss of species	Project owner/EPC contractor	ESIA 2024	Biodiversity Management Plan	All Project Worksites
33							
	Construction	•Provide comprehensive training to construction workers and equipment operators on reptile conservation and the importance of implementing mitigation measures;Identify and compensate all land users for reduction in subsidies, including both formal and informal land users and prior to accessing the land; •Provide comprehensive training to construction workers and equipment operators on reptile conservation and the importance of implementing mitigation measures;Provide compensation for loss of assets at replacement cost; •Provide comprehensive training to construction workers and equipment operators on reptile conservation and the importance of implementing mitigation measures;Ensure appropriate disclosure of information, consultation, and the informed participation of those affected; •Provide comprehensive training to construction workers and equipment operators on reptile conservation and the importance of implementing mitigation measures;Improve or, at a minimum, restore the livelihoods and standards of living of affected persons to pre-project levels, so as to facilitate sustainable improvements to socio-economic status;	Livelihood	Project owner/EPC contractor	ESIA 2024	Land Acquisition and Livelihoods Restoration PlanPlan	All Project Worksites
34							
	Construction	•Where possible seek to unbundle procurement contracts so that local community members have a greater chance of supplying the Project and advertise procurement contracts locally and in local languages. •Confirm Silistra District communities will be considered 'local' for the purpose of local hiring. •Where possible (i.e., the suppliers are competitive and can meet the technical requirements which need to be achieved), the Project Company (and their contractors) will seek to procure materials and services from SMEs based in the neighbouring locations to ensure that the positive effects of using SMEs are experienced as close to the Project site as possible to enhance the positive benefits of the Project at this location. This includes SMEs owned by women which shall be identified by the Company during the Project execution stage. Details will be included within the Contractor and Supply Chain Management Plan.	Economy, employment and Income	Project owner/EPC contractor	ESIA 2025	Contractor and Supply Chain Management Plan.	Project sites
35							
	Construction	•Selection criteria, job profiles, and number of workers for the construction phase with specific attention to the enhancement of the local community, women, and vulnerable groups' employment. •Clear communication of required involvement of local workforce and local companies, explaining requirements on qualification, availability, eventual training, etc. •Description of the recruitment process and details of the recruitment information disclosure to local communities. •Details of vocational trainings available to employed construction workers. •Description of the Worker's Code of Conduct, highlighting labour conditions with an aim to reduce the risk of gender-based violence and harassment. •Require all workers to sign the "code of conduct – workers" •Details of worker's grievance mechanism that will be disclosed during the recruitment process and the employment period. •A commitment to provide workers with a sufficient notice period as to when their job contract terminates. •Monitoring indicators and the reporting timeline for the recruitment process and management of the workforce.	Economy, employment and Income	Project owner/EPC contractor	ESIA 2024	Workforce Management Plan	All Project Worksites
36							
	Construction and 0peration	•Ensure regular, open and transparent communication with all stakeholders	Economy, employment and Income	Project owner/EPC contractor	ESIA 2024	Stakeholder Engagement Plan	All Project Worksites and location, Social AoI
37							
	Construction	•Ascertain, prior to the construction phase, whether the local services are sufficient for workforce influx and, where appropriate, liaise with relevant authorities to limit the negative impact of the Project on local users' access to public services.	Infrastructure and public services	Project owner/EPC contractor	ESIA 2024	Workforce Management Plan	All Project Worksites
38							

	Construction	•EPC Contractor to be certified to ISO 45001 (or equivalent) •EPC Contractor to implement communication systems to enable communications from any part of the site. •Install safety signage throughout the Project site, following GIIP specifications and codes of practice. •Establish comprehensive OHS Plans for construction prior to commencemnet of costruction •Ensure all workers receive induction and regular ongoing OHS training •EPC Contractor and subcontractors to hire HSE Managers and Officers (1:50 for construction workforce) •Conduct Project specific risk assessment. •Develop a project specific Emergency Preparedness and Response Plan (EPRP) •Include in the EPRP a medical evacuation procedure to enable injured workers to access appropriate emergency facilities. •Ensure medical preparedness includes permanent on-site paramedic, first aid facilities and first aiders (ratio of 1:50 first aiders/workers) on site. •Provide worker shelters, toilets and provisions (including drinking water) at work fronts across the site (not just at the main site camp). •EPC contractor to employ at least one HSE Manager and one EPC Contractor HSE Officer for every 50 workers. •Subcontractors with more than 20 workers shall deploy a dedicated HSE Officer and an additional HSE Officer for each additional 50 workers deployed onsite. •Implement mitigation measures in relation to lead in the soil (including an assessment of required personal protective equipment (PPE) for workers and training in the risk of lead contamination) •Workers to receive correct PPE, free of charge and to be replaced when needed. •Workers must receive appropriate training, prior to commencement of work and on an ongoing basis through toolbox talks, oriented by training plans. •Drills (including OHS, spills, and emergency drills) should be undertaken regularly. •First aid facilities to be available at all work fronts. •Establish an accident and incident reporting procedure. Including providing incentives for reporting near misses and corrective actions.	Occupational health and safety	Project owner/EPC contractor	ESIA 2024	Occupational Health and Safety Plan	All Project Worksites
39							
	Design/ contract/ construction	•Incorporate safety requirements into the project design (design of the route of the OHTL to avoid health risk for the public and ensure the OHTL does not pass directly over any residential property). •Where necessary include fencing, safety signage (in locally used languages) and other relevant features to deter community members from entering the Project site. •Undertake a stakeholder engagement campaign to inform community members of the possible risks and impacts of the construction of the Project (refer to SEP), including traffic, grievance mechanism, worker conduct, GBVH risks. •Prepare a plan/strategy to guard workers and community members against contracting communicable diseases. •Employ local security guards and female guards where possible •Undertake OHS and emergency drills throughout the construction and operations phases. • Installation of anti-climbing devices to avoid accidental or intentional attempts to access the site; •Painting with fluorescent colours of towers near the roads to make them visible. •Design of the route of the OHTL to avoid health risk for the public and ensure the OHTL does not pass directly over any residential property •Preventative maintenance to ensure the robust connection of the lighting protection (earthing) system •Recommended techniques to prevent the electrocution hazards include use of signs, barriers, to prevent shock; •The provision of automatic fire detection systems linked to automatic shutdown systems will allow them to be dealt with in the shortest possible time by disconnection from the power supply systems. This prevention is connected with the Substation; •After any damage has been assessed and documented in case of storm damage / wind damage, the utility companies will be notified. Lastly, if safe to do so, the damaged areas will be protected from further damage	Community health and safety	Project owner/EPC contractor	ESIA 2024	Workforce Management Plan	Social AoI
40							
	Construction	•Enforcement of Workers' Code of Conduct containing a set of rules on behavioural standards and cultural awareness requirements for all employees (including security personnel) •House workers from outside the area from the direct AOI in accommodation away from the immediate communities as much as possible, thereby reducing potential social tensions. •Undertake cultural awareness training for migrant workers, should it be deemed necessary.	Community health and safety	Project Owner	ESIA 2024	Workforce Management Plan	All Project Worksites
41							
	Construction and operation	Security Personnel will have to: •Sign a "code of conduct – security" •Be trained in the rules of force, culturally appropriate engagement, and the Project's grievance mechanism. •Wear a uniform so that they are easily identified as security personnel, including a unique reference/label that can be used to make a grievance about a specific person. •Have adequate communications equipment so that personnel can request support during the start of any incident. •Understand details about the Project's grievance mechanism that can be used to address any concerns promptly associated with the actions of security personnel and details as to how this is to be disclosed	Community health and safety - Security	Project owner/EPC contractor	ESIA 2025	Workforce Management Plan	All Project Worksites
42							
	Contract / pre-construction	•EPC contractor to implement a Human Resources (HR) Policy, Code of Ethics, Policy Against Bribery and Corruption, Recruiting Policy, Supply Chain (Procurement) Policy, and Communication Policy •EPC contractor and tier 2/3 sub-contractors to demonstrate functioning HR policies aligned with Lender requirements, ILO core conventions and Bulgarian law. •Define manpower requirements for the construction and operation phase for the EPC Contractor and subcontractors, including the number of E&S personnel and their qualifications. •Perform a supply chain due diligence or obtain third-party supply chain due diligence reports to verity potential suppliers' credentials regarding the occurrence of forced labour, child labour or occupational health and safety failures. The supply chain will be mapped (to the polysilicon level) and verified by an independent consultant for point of origin. •Suppliers shall have a system to identify and manage risks associated with child labour, forced labour, occupational health and safety and pollution prevention for their activities and their core supply chain.	Labour and working conditions	Project owner/EPC contractor	ESIA 2024	Workforce Management Plan	All Project Worksites
43							

	Pre-construction/ construction	The following measures required by IFC PS 2 will be implemented during the pre-construction and construction phase for the economy, employment and livelihood component: •Collaborate with the State Employment Offices; •Collaborate with local institutions (Municipality and Administrative Units) •Put in place transparent and fair recruitment procedures •Implement Worker code of conduct (including grievance mechanism) •Strictly follow the Bulgarian Code of Work requirements; •IFC PS 2 Labor and Working Conditions; •Adopt and maintain human resources policies and management systems or procedures with the requirements of PS 2 and national law. These policies and procedures will be understandable and accessible to workers, and in the main language(s) spoken by the workforce. HR policies and management will ensure: •Non-discrimination and equal opportunities to all workers; •Compliance with national laws and international standards regarding employment of minors; •Avoidance of any form of forced labour and child labour; •Provide clear and transparent information on wages, benefits and working conditions; •Provide workers with a safe and healthy work environment; •Use an international workforce for a term-limited period for compliance and training purposes, where national personnel cannot be sourced. •Implement a grievance mechanism open to employee and non-employee workers. Ensure that all workers directly and indirectly employed are informed on how to submit grievances. •Prepare a Worker Accommodation Management Plan •Provide equal trainings for men and women; •In field training during the development of implementation phase, also through Contractor/s and Sub-Contractors; •Establish training and re-training program that specifically target women, to increase their opportunities; •Define number of persons to be interviewed for a new position which need to be women; •Clearly indicate that the position opportunity is for both men and women; •Provide a women friendly working environment.	Labour and working conditions	Project owner/EPC contractor	ESIA 2024	Workforce Management Plan	All Project Worksites
44							
	Construction/ operations - enhancement	•Contractors will be contractually required to maximise use of local workforce in the Project; •Prioritize employment of members of vulnerable groups and individuals •The presence of a CLO through the construction phase will allow any future issues to be identified and addressed referring to women and vulnerable groups and individuals; •In order to increase the project's Local Content, the Company will aim to procure goods, services and materials from local businesses to the extent possible; •Ensure priority of woman owned business during the procurement process •Company will provide information on procurement, tendering, and contracting processes with a transparent and clear approach, to ensure that equal access to opportunities is guaranteed; •Information on procurement opportunities will be given to local businesses, through tailored communication with Local authorities and other appropriate parties; •Local companies identified as able to provide goods, materials and services during the strategical analysis will be contacted directly providing information on tendering opportunities	Labour and working conditions Economy, employment and Income	Project owner/EPC contractor	ESIA 2024/GIIP	Workforce Management Plan Stakeholder engagement plan	Project site
45							
	Construction	•Require all workers to sign the "code of conduct – workers" •Provide workers with safety equipment to prevent occupational health issue and reduce the number of accidents at work •Provide regular training on first aid and safety responses in order to limit accidents' impact on workers' health	Labour and working conditions	EPC contractor	ESIA 2024	Health & Safety Management Plan	Project site
46							
	Construction	•Ensure appropriate accommodation is provided to all workers, in line with IFC PS2 and national requirements	Labour and working conditions	EPC contractor	ESIA 2024	Workforce Management Plan	Project site
47							
	Construction	•Demarcate construction boundaries and minimize areas of surface disturbance; •Where possible, locate laydown areas and construction camps in areas that are already disturbed or cleared of vegetation; •For the construction site maintenance, conduct good housekeeping on site to avoid litter and minimize waste; •Use existing tracks/roads for access, where possible; and •Within the environmental management system, prepare a restoration management plan including replanting indigenous species, and landscaping and rehabilitating construction yards.	Landscape	EPC contractor	ESIA 2024	Topsoil Management and Site Reinstatement Plan	Project site
48							
	Construction and operation	•Where possible, locate laydown areas and construction camps in areas that are already disturbed or cleared of vegetation; •For the construction site maintenance, conduct good housekeeping on site to avoid litter and minimise waste; •Minimise night lighting while guaranteeing the minimum safety level; •Use of materials that will minimize light reflection should be used for all Project components; •Existing vegetation should be retained to the greatest extent possible. Vegetation should be retained along roads, and other Project infrastructure	Visual	EPC contractor	ESIA 2024	Topsoil Management and Site Reinstatement Plan; Health & Safety Management Plan	Project site
49							
	Construction and operation	•Rehabilitation of all viable disturbed areas (e.g. temporary access tracks and laydown areas) must be undertaken following construction. This must be done in such a way so as to facilitate natural regeneration of vegetation; •Maintain ongoing engagement between the Project and local communities, with communities informed in advance of any vegetation clearing to allow pre-harvesting of resources such as building materials or other useable resources.	Ecosystem services	EPC contractor	ESIA 2024	Topsoil Management and Site Reinstatement Plan: Stakeholder Engagement Plan	All Project Worksites
50							
	Design/ pre-construction	•Include in Project contract requirements to restore existing roads or private property during or at the end of construction activities. Any improvements will leave a positive legacy on the local road conditions, benefiting the local communities. •Consider excluding Access option three which requires access through the village of Polkovnik Lambrinovo. •Design laydown area and delivery approach to minimise vehicle stopping outside the site. •Include clause in the EPC contract that that any damage to road (wear and tear over the construction period) must be repaired and 'made good'.	Traffic	EPC contractor	ESIA 2024	Traffic and transport Management Plan	All Project Worksites
51							

	Construction	•Prepare a traffic and transportation management plan (TMP) • Work with local authorities in scheduling truck deliveries, especially oversized truck deliveries, to reduce impacts on road function and safety. Specifically: - Where safe and feasible, schedule deliveries to minimise travel impacts for other road users based upon local conditions and the results of stakeholder engagement. •Consider scheduling deliveries during non-peak hours and at intervals to avoid queuing of delivery vehicles along public roads near the access points to internal Project roads. •Demarcate delivery roads and access tracks across the site and ensure all workers stick to demarcated areas. •CLO to engage the local community to inform them of the start of construction works and timings for large vehicle deliveries •Install appropriate signage to inform local communities and road users of site access points. •No night-time driving along unsurfaced roads. •No night-time deliveries •Maximum of 40 km/h on the section of road between R218 and Polkovnik Lambrinovo •During preconstruction surveys, perform a photographic assessment of road condition and private properties adjacent to the local road and R218.	Traffic	Project owner/EPC contractor	ESIA 2024	Traffic Management Plan; Stakeholder Engagement Plan	All Project Worksites
52							
	Construction	Include in TMP the following GIIP as a minimum: •Measures to transport Project components as well as transportation of workers. •Prepare a disclosure plan for community members, to inform as to the start of construction works and timing and Project impacts along the transportation route. •Ensure that local communities are informed, in a timely manner, about road closures, works on roads or use of heavy good vehicles. •Plan and implement awareness campaigns on risks related to the traffic increase, especially in the schools present in the area. •Survey the condition of roads to be used for concrete supply, equipment, and component deliveries prior to construction and submit reports to local road authorities. (pre-construction). •Transportation will be protected and patrolled by crash trucks and/or possible police escort to guarantee the safety of other road users and to inform the respective authority for the overloaded trucks. •Address transportation safety risks of Project traffic, including (but not limited to) truck routes, hours of transport, community notification, signage, education, and other measures to minimize safety hazards. (construction, decommissioning) •Obtain permits and implement all necessary road improvements or alterations prior to deliveries. If necessary, construct bypasses to avoid hazards to properties or other road users at constrained road segments or intersections. (pre-construction, construction, decommissioning) •Restore signs, street lights and other street furniture removed for or damaged by the movement of Project-related trucks. (construction, decommissioning). •Repair road damage resulting from construction traffic during construction period •Plan truck routes for non-oversized loads using roads with adequate geometrics and load-bearing capacity for safe passage. (pre-construction, construction, operations, decommissioning) •Consider community schedules that result in higher levels of local traffic, school schedules, or community events. Schedule truck traffic outside of these times in addition to avoiding periods of peak traffic volumes. (construction, operations, decommissioning) •Frequent testing of drivers to eliminate drink driving, also check for use of seatbelts and identify speed limits that are monitored during the construction phase. •Undertake route and access surveys on road condition and ensure that damage to existing roads are repaired promptly and that roads are left in original or better condition at the end of construction activities. Work with local road authorities to identify damage to and restore county, communal, and agricultural roads used for Project-related traffic. Coordinate with national road authorities (the Bulgarian Road Infrastructure Agency (RIA)) to coordinate and contribute to repair and maintenance of national roads damaged by construction. (construction, decommissioning). •If temporary access roads are necessary, the land required for these works will be returned to its original condition. •Possible use of flag men or other means of traffic control at key points on roads, especially during school hours in the hotspot areas •All vehicle drivers must be in possession of valid driver's license •All drivers must use only designated routes •All traffic signs must be respected •No vehicles should be driven if loaded in excess of its manufacturer-specified weight bearing capacity •The use of cell phones while driving is prohibited •All accidents and traffic violations must be reported by drivers to the Project Management Team •Only company employees are to be transported in the company vehicle	Traffic	Project owner/EPC contractor	ESIA 2024	Traffic Management Plan; Stakeholder Engagement Plan	All Project Worksites
53							
	Construction, operation, decommissioning	•Establish and implement standards addressing the following: - Training and accreditation for project drivers, including contractors. - Driver fitness standards, including mandatory rest periods and prohibition of drug/alcohol use. - In-vehicle monitoring systems to monitor vehicle speed and location (Project vehicles and contractors). - Project and contractor standards for vehicle safety and maintenance. - Security response for vehicle incidents. - Road stability standards.	Traffic	EPC contractor	ESIA 2024	Traffic Management Plan	All Project Worksites
54							
	Construction	•Project Company to confirm no feature of archaeological interest are known through formal communication with the National Institute of Archaeology under the Academy of Sciences of Bulgaria •EPC contractor to establish a chance-find procedure (including national and lender requirements and following GIIP) for the construction phase or any phase that requires excavation work. •Train excavation workers in chance find procedure during the induction. •Should items of cultural heritage be identified, they should be managed in line with the chance find procedure and any requirements of the National Institute of Archaeology. •Notify the National Institute of Archaeology under the Academy of Sciences of Bulgaria of any find.	Cultural heritage	Project owner/EPC contractor	ESIA 2024	Cultural Heritage Management Plan	All Project Worksites
55							