

Environmental and Social Action Plan (ESAP)

Action	Description	Completion Dates
PS 1 - Assessment and Management of Environmental and Social Risks and Impacts		
1	<b>Environmental &amp; Social Impact Assessment:</b> The company will update the ESIA (and associated NTS and ESMP) before construction and as a condition of commitment to close the remaining gaps with IFC PSs as outlined in the ESIA gap analysis of the IFC and IESC.	CoC
2	<b>Project Construction Environmental &amp; Social Management System (ESMS):</b> The company will develop and implement an ESMS appropriate for the scale & complexity of the project, per the general requirements of IFC PS1. The ESMS will include all necessary plans/procedures to be developed and executed to address the mitigation measures identified through the ESIA, including, as a minimum, the following management plans: pollution prevention, waste management, contractor management, supply chain (including a PV Module Supply Chain Risk Assessment), community health, safety, and security, emergency preparedness and response, labor management, occupational health and safety, security management, transport and traffic management, biodiversity management, chance finds procedure, and stakeholder engagement plan (including community grievance mechanism) aligned with IFC PSs, relevant WBG EHS Guidelines and local requirements. The ESMS will also include a Commitments Register. The Commitments Register will list all environmental and social commitments made by the company in the ESIA documentation and through acceptance of the national permits and legal agreements stipulated with the Government of Bulgaria.	Six weeks before Construction (15 <sup>th</sup> May 2024)
3	<b>Contractor Construction ESMS:</b> The company will require its EPC contractor to develop and implement its own Construction ESMS, including policy statements, management and monitoring measures, and aspect-specific management plans and procedures applicable to the EPC activities (including contractors and sub-contractors) and tailored to the project's construction methodology, engineering design, and commissioning phase. The structure and content of the EPC ESMS will fully align with the company's ESMS and the adopted project-specific standards.	Four weeks before Construction (1 <sup>st</sup> June 2024)
4	<b>Operation Environmental &amp; Social Management:</b> the company will develop and implement an Operations Environment & Social Management System (OESMS) consistent with the project ESIA, IFC PS, WBG EHS Guidelines, and national requirements. The OESMS will include an Operations Environmental and Social Management Plan (OESMP), which will address all relevant E&S risks, including, at a minimum, pollution prevention, noise management, water management, waste management, emergency response, community health, safety & security, biodiversity management, environmental monitoring.	6 weeks before commencement of operations - (15 <sup>th</sup> May 2025)
5	<b>Contractor OESMS -</b> The company will require its O&M contractor to develop and implement its own operations OESMS, including policy statements, management and monitoring measures and aspect-specific management plans applicable to the O&M activities. The structure and content of the O&M OESMS will be fully aligned with the company's and with the adopted project specific standards.	4 weeks before the commencement of operations - (1 <sup>st</sup> June 2025)
6	<b>EHS Resourcing (Construction)</b> – The company will employ, at a minimum, a full-time, qualified, and experienced Environment, Social, Health, and Safety (ESHS) Manager and Community Liaison Officer (CLO). Additionally, the company will engage (either as its own staff or contracted as needed) adequate support staff to ensure E&S oversight, including OHS specialist/s, social specialists, and environmental and biodiversity specialists.  The company shall require its EPC to appoint appropriate counterparts to these staff.	Four weeks prior to Construction (1 <sup>st</sup> June 2024)
7	<b>EHS Resourcing (Operations)</b> - The company will engage an ESHS Manager and CLO during the operational phase to implement the ESMS. It shall require its O&M contractor to employ adequate support staff to ensure E&S oversight of their activities and implement applicable project commitments	Two weeks prior to Construction (15 <sup>th</sup> June 2024)
PS 2 – Labor and Working Conditions		
8	<b>Human Resources Management</b> - The company will develop and implement project human resources (HR) processes including a labor management plan and associated policies consistent with IFC PS2, International Labor Organization (ILO) requirements, and EU and Bulgarian labor codes, which will apply to all project workers (including contractors/subcontractors). The policy/procedures will define the company's commitments concerning labor and working conditions, maximizing local employment, equal opportunities and non-discrimination (including putting in place best practice recruitment policies to encourage and support qualified women to apply for jobs), anti-sexual harassment and gender-based violence and harassment (GBVH), prohibition of child and forced labor, whistleblower protection, freedom of association, and collective bargaining. The company will require all contractors to report annually on the number and % of women employed, disaggregated by job function, level, and pay. The company will require its EPC Contractor to develop and implement a human resources policy fully aligned with its own.  The company will develop a code of conduct, including enforceable sanctions aligned with national law, applicable to all workers (including their conduct within worker accommodation facilities), specifically including mitigants related to GBVH. All project workers will receive induction training relating to the project's human resources policies, including mandatory training on the Worker Code of Conduct (including GBVH requirements).	Prior to Construction (1 <sup>st</sup> July 2024)

9	<p><b>Worker Grievance Mechanism (WGM)</b> - The company will develop and implement a project-level worker's grievance mechanism (WGM) in accordance with IFC's PS2, and national law. The WGM will be available to all project workers, regardless of their employer or employment status. The company will disseminate information about its use to the workforce (in a language the workers understand). The WGM will include specific considerations for receiving GBVH grievances, including multiple entry points to raise and address allegations and options to report anonymously if preferred.</p> <p>The company will appoint an adequately trained grievance officer (including detailed knowledge of Bulgarian labor law and sexual harassment) to attend to the worker grievances and coordinate the implementation of the WGM. The WGM will contain a clear policy on anti-retaliation and retribution of the grievant. The company will ensure that available WGM communication channels are disseminated in all facilities, accommodating project workers.</p> <p>The company will use the services of a specialist third party to administer a project level survivor centric GBVH grievance mechanism including GBVH grievance case management (informed consent, incident investigation) and identification of a survivor referral mechanism offering independence and confidentiality.</p>	<p>Before Construction (1<sup>st</sup> July 2024)</p> <p>Before Construction (1<sup>st</sup> July 2024)</p>
10	<p><b>Labor Conditions</b> - The company will hire a suitably qualified and experienced independent consultant, to undertake semi-annual labour monitoring during the construction phase of the project to assess contractor and sub-contractor adherence to local labor laws and project labor and working condition commitments.</p>	<p>6 months after the start of construction (1<sup>st</sup> January 2025)</p>
11	<p><b>Contractor Management</b> – The company will develop a Contractor Management Plan defining its approach to managing the E&amp;S performance of its contractors, subcontractors, and other third parties during the various phases of the project. The contractor management approach will be consistent with the general principles described within IFC Good Practice Note: Managing Contractors' Environmental and Social Performance.</p>	<p>Four weeks before Construction (1<sup>st</sup> June 2024)</p>
12	<p><b>Workers Accommodation Policy</b> - The company will develop a worker's accommodation policy establishing the basic requirements that any accommodation implemented as part of the project (including contractors and subcontractors' facilities) should comply with, in line with Bulgarian regulations, IFC PS2 requirements and align with IFC's and EBRD's Good Practice Note on Workers' accommodation.</p>	<p>Two weeks before Construction (15<sup>th</sup> June 2024)</p> <p>Before construction (1<sup>st</sup> July 2024)</p>
13	<p><b>Health &amp; Safety</b> - The company will ensure through contractual clauses that its EPC and O&amp;M contractor develop and implement a site-specific occupational health and safety (OHS) management system, including the necessary plans and procedures commensurate to the project risks, which will apply to all project workers, including subcontractors. The plans/procedures will include gender-differentiated risks and define a program for workers to complete basic OHS training (including training related to gender-specific risks), and specific training for staff undertaking high-risk activities.</p>	<p>Two weeks before Construction (15<sup>th</sup> June 2024)</p>
PS 3: Resources Efficiency and Pollution Prevention		
14	<p><b>Noise Impacts</b> – The company will conduct a quantitative noise assessment assessing potential construction and operational phase impacts. The assessment shall identify sensitive receptors in line with the definitions in the relevant EHS Guidelines and specifically confirm no exceedance of 45dB nighttime criteria at sensitive receptors or 3db (A) change based on measure baseline data (where 45dbA may be exceeded). If either assessment identifies the need for further mitigation measures (above those defined within the ESIA), these will be implemented. Additionally, as part of the project's E&amp;S monitoring program, the company will conduct noise monitoring to verify the noise assessment results and compliance with national and project requirements.</p>	<p>COC</p>
15	<p><b>Contamination Assessment</b> – The company will engage an independent consultant to conduct a phase I environmental site assessment (ESA) to identify potential sources of contamination, receptors, and pathways. Should the Phase I ESA suggest possible contamination, the company will complete a Phase II ESA to verify the presence of contamination and take remedial measures as required.</p>	<p>Before construction (1<sup>st</sup> July 2024)</p>
16	<p><b>Asbestos Assessment and Waste Disposal</b> - The company will ensure that an asbestos survey is completed to verify the presence/absence of asbestos-containing material (ACM) in the demolition waste removed from the site. Should ACM be identified, a suitably licensed contractor will be engaged to remove and dispose of the ACM as per national and EU requirements and GIIP. Furthermore, the company will ensure all non-ACM demolition waste is removed from the land plot and disposed of at a suitably licensed facility or re-used on the project site.</p>	<p>Before disbursement (1<sup>st</sup> July 2024)</p>
PS4: Community Health, Safety and Security		
17	<p><b>GBVH Risk Assessment</b> - The company will conduct a GBVH risk assessment, focusing on Silistra (where most project workers are expected to be accommodated) and the villages within the project's social area of influence. The assessment will utilize socio-economic baseline data, to the extent possible, collected as part of the revised ESIA to identify vulnerable groups at risk of GBVH (e.g., women-headed households and school children).</p> <p>Based on the results of the assessment, the company will develop a GBVH action plan to include prevention and response measures to mitigate and monitor any identified impacts. The areas close to the hotels where workers will be accommodated will be included in the Stakeholder Engagement Plan to ensure they are aware of the impacts and mitigations, the worker's Code of Conduct, and how to access the Community Grievance Mechanism.</p>	<p>Before construction (1<sup>st</sup> July 2024)</p>
18	<p><b>Traffic Management</b> -The company shall ensure its EPC Contractor completes a detailed traffic transport survey and Social Impacts Register to identify the most appropriate transport routes for the project. As part of the ESMS (ESAP#3), the EPC will develop and implement a Traffic Management Plan (TMP), including a traffic risk assessment, which defines appropriate traffic management and accident prevention measures to mitigate any impact on local communities and general road users. The EPC will assess local road conditions and complete a dilapidation survey of structures/infrastructure adjacent to community roads (as required).</p>	<p>Before construction (1<sup>st</sup> July 2024)</p>
PS5 - Land Acquisition and Involuntary Resettlement		
19	<p><b>Livelihood Restoration Plan</b> - The company will engage a suitable, qualified, and experienced consultant to develop, implement, and monitor an LRP aligned with national law and IFC PS5. The LRP, through a baseline socio-economic survey, will be designed to capture all potential impacts on land and livelihoods related to the project's construction and operations phases. It will assess the project's land acquisition process, including land acquisition and easement rights secured by the previous developer, and identify any inconsistencies with IFC PS5. If any consistencies are identified, the project will commit to providing complementary measures (including compensation payments, if deemed required) to address these with a commitment to continue compensatory measures to PAPs until livelihoods have been restored, which may take multiple seasons, depending upon the extent of land disturbance; direct engagement with PAPs to discuss their eligibility and entitlements, special assistance measures that will be provided to vulnerable groups, and the provision of preferential access to project-related employment and vocational skill development opportunities.</p> <p>The company will report on its monitoring of LRP implementation to IFC through the submission of biannual monitoring reports during the construction phase and annual reports during operations until all the LRP activities are completed.</p>	<p>One month before commencement of works on the OHTL (1<sup>st</sup> September 2024)</p>

20	<p><b>LRP Implementation Monitoring -</b></p> <p>The company will engage a suitable, qualified, and experienced consultant to complete a closeout monitoring survey one year after all LRP measures have been implemented to confirm alignment of the LRP with PS5 and, as appropriate, propose any closeout measures. Three years after all the LRP activities have been deemed complete, the consultant will conduct a completion audit to assess the implementation outcomes against agreed objectives and confirm whether livelihoods have been restored to pre-project levels or better or if supplemental action is required.</p>	12 months after the start of operations (1 <sup>st</sup> July 2026)
PS 6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources		
21	<p><b>Construction-phase Biodiversity Management Plan (BMP)</b> – The company will develop and implement a construction-phase Biodiversity Management Plan (BMP) which will include pre-construction surveys to identify habitat features at the PV site that are associated with the Natura 2000 Site, Natural Habitat and priority biodiversity values (i.e. nesting birds, European Ground Squirrel, Marbled Pole Cat and bats). The surveys will inform the BMP to set forth all associated measures relevant to these values, including avoidance and minimization of disturbance to bird and mammal nests and bat roosts during the construction phase. The company will appoint a biodiversity specialist, who will be responsible for the surveys, overall management, and reporting of all mitigation activities relating to the project.</p>	Four weeks before Construction (1 <sup>st</sup> June 2024)
22	<p><b>Post-Construction Fatality Monitoring Program</b> – The company will contract an internationally-recognized and specialized consultancy to collaborate with a locally contracted ecological consultancy to conduct pre-construction bird surveys along the OHTL routes to identify potentially high-risk areas for priority bird species. The survey outcomes will inform the design of a Post-Construction Fatality Monitoring (PCFM) program to be developed by the international consultancy and implemented by the local consultancy. The program will take place for at least a two-year period with semi-annual reporting following a standardized template, but the actual timeframe of the PCFM program will depend on fatality results.</p>	Four months before operations (1 <sup>st</sup> March 2025)  Two months before the start of operations (1 <sup>st</sup> May 2025)
23	<p><b>Operations-phase Biodiversity Management Plan (BMP)</b> – The company will develop an operations-phase BMP, which will be informed by the pre-construction surveys, and identify measures to meet Natural Habitat NNL objectives. The operations-phase BMP will include a Habitat Restoration Program for the xeric grassland and associated priority biodiversity values. A qualified expert with international experience will be procured to develop the Habitat Restoration Program, which will, at the minimum, include (i) recommendations for restoration measures and opportunities to maintain biodiversity on-site and (ii) a clear demonstration of how NNL will be achieved, including any off-site conservation measures, notably for bats. The company will coordinate with relevant stakeholders in developing and implementing the operations-phase BMP and Habitat Restoration Program, including local experts and the Regional Inspectorate of Environment and Water (RIEW), responsible for managing the Natura 2000 Site.</p>	Four months before operations (1 <sup>st</sup> March 2025)  Two months before the start of operations (1 <sup>st</sup> May 2025)
Stakeholder Engagement		
24	<p><b>Stakeholder Engagement</b> - The company will update and implement its SEP before the start of construction activities. The revised SEP will describe the outcomes of engagement activities undertaken to finalize the ESIA and update the engagement action plan for the project's construction phase, defining its engagement program tailored for each stakeholder, clear timelines and KPIs to facilitate monitoring. The company will inform the community of the project's workers and security force's code of conduct and the availability of the project's grievance mechanism to raise complaints.</p> <p>The company will ensure that its community liaison officer/team member receives adequate training on implementing IFC PSS and gender inclusivity awareness training before the commencement of construction activities.</p>	Two weeks before Construction (15 <sup>th</sup> June 2024)