Dama PV Project, Arad, Romania - Phase 1 **Construction Environmental and Social Management Plan (CESMP)**	

Environmental and Social Management Plan
DAMA PV Project

Project Owner	Rezolv Energy	Project Company	West Power Investments SRL

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Abbreviations

A&E	Accident and emergency
AOI	Area of Influence
BMP	Biodiversity Management Plan
CC	Civil Code
C-ESMP	Construction Environmental and Social Management Plan
CHS	Community Health and Safety
CLO	Community Liaison Officer
COD	Commercial Operation Date
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EHS	Environment, Health and Safety
EIA	Environmental Impact Assessment
EPC	Engineering, Procurement and Construction
EPRP	Emergency Preparedness and Response Plan
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESP	Environmental and Social Policy
EU	European Union
FC	Financial Close
GBV	Gender-Based Violence
GIP	Good International Practice
GM	Grievance mechanism
H&S	Health and Safety
HPZ	Health Protection Zone
HR	Human Resources
HSES	Health, Safety, Environment and Social
IFC	International Finance Corporation
ILO	International Labour Organisation
IUCN	International Union for Conservation of Nature
LC	Land Code
MSDS	Material Safety Data Sheets
NSR	Noise Sensitive Receptors
NTP	Notice to Proceed
NTS	Non-Technical Summary
O&M	Operations and Maintenance
O-ESMP	Operations Environmental and Social Management Plan
OHS	Occupational Health and Safety
OHTL	Overhead Transmission Line
PPE	Personal Protective Equipment
PR	Performance Requirement
ROW	Right of Way
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SS	Substation
SwS	Switching Station
UNFCCC	United Nations Framework Convention on Climate Change

1 Introduction

1.1 Introduction

This Construction Environmental and Social Management Plan (CESMP) presents the requirements for implementation, management and monitoring of the environment and social (E&S), health and safety (H&S), labour and security requirements for the Dama PV Project, Arad, Romania during the construction phase.

The Project Company is the SPV **West Power Investments SRL**. **West Power Investments SRL** will develop the Project with support from private investment. An Engineering, Procurement and Construction (EPC) contractor will perform the design, construction and commissioning work on behalf of **West Power Investments SRL** following an open tender process. **West Power Investments SRL** will be supported by specialist technical and environmental and social specialist to oversee the implementation of the technical, financial, environmental and social (E&S requirements of the Project in line with the environmental and social (E&S) requirements of the investment institutions.

Based on the Environmental and Social (E&S) Policy criteria as implemented by the major international finance institutions and international lenders in general (including but not limited to Equator Principle EP41 signatories), the Project qualifies as 'Category A. An Environmental and Social Impact assessment (ESIA) was performed for the project starting in 2023, and a Supplementary Lenders Information Package (SLIP) was developed in early 2026 to cover all E&S aspects of the project.

1.2 Objective

The objective of this CESMP is to provide a description of all proposed activities and planned facilities and to outline the actions to be taken by the Project developer and EPC Contractor, including:

- Conform to all applicable laws, implementing regulations, financing institution obligations, permit obligations and good international industry practice (GIIP);
- Not cause undue harm or damage to natural resources, life (including human and wildlife); property, or sites, structures or objects of historical or archaeological significance;
- Be constructed safely;
- To be considerate of nearby community and to honour commitments made in community disclosure and consultation activities; and
- To set a framework for Contractors to implement on-site E&S, H&S, labour and security measures during construction.

1.3 Scope

[1] The Equator Principles is a risk management framework adopted by financial institutions, for determining, assessing and managing environmental and social risk in project finance.

This CESMP applies to the Project Company and the Contractor, sub-contractors and third-party consultants (collectively described as the Contractor). The CESMP applies to the construction phase and to activities connected with the Project construction site, upgrade of existing access roads, interconnection works, transport and delivery of materials to and from the worksites, disposal of waste and interactions with the local community. Management of operational impacts is set out in a separate management plan. Decommissioning impacts will be addressed at the relevant time.

This document is a live management instrument and may evolve as the Project Company finalises contracts for the Project's engineering, procurement and construction (EPC). The Project Company commits to undertaking a formal review and update of the CESMP prior to engagement of the main contractor, in order to incorporate the results of the ongoing Impact Assessment and ensure that all identified mitigation and monitoring measures are fully reflected.

A second update of the CESMP will be carried out following contractor appointment, once the construction methodology has been finalised, the contractor's organisational structure and key E&S positions have been defined, and the detailed construction strategy has been refined. This staged approach will ensure that the CESMP remains aligned with the final design, risk profile and management arrangements of the Project.

1.4 Project Overview and Receptors

The Project involves the development of a 1044 MW solar PV plant, on approximately 1,064,5 ha of land in Arad County, Romania and will be developed in four phases. This CESMP applies to Phase 1. Project construction phase will take approximately 2.5 years and will be carried out in three stages, with the first section put into operation after 10 months from the start of the works. Works are expected to start in 2026. The estimated period of operation of the Project is at least 25 years

The Dama PV Project is located in Western Romania, in the North-Western area of Arad County, on the territory of Grăniceri and Pilu communes, at approximately 3.6 km east of the border with Hungary and the nearest Hungarian settlement, Elek, is located at approximately 4.3 km west of the Project site.

The nearest Romanian settlements to the Project area are listed below and a short overview is provided in the table below:

- Graniceri – 250 m west;
- Pilu – 2.5 km north-west;
- Siclau – 2 km south-east;
- Socodor – 2.7 km east;

Table 1: Summary of Settlements in the Project Area (source: project Dama ESIA, ERM, 2023)

Administrative Territorial Unit (ATU)	Settlement	Urban (u) or Rural (r)	Social AoI	Located in the 2 km Environmental AoI	Residential areas distance to Project components	Relevance to the Project
Grăniceri Commune	**Grăniceri**	r	Direct	Yes	The SE edge of the village is located	The Project overlaps with the administrative area of the Commune. Proximity to the
	Șiclău	r	Direct	No	2.7 km SE from the connection substation	

Administrative Territorial Unit (ATU)	Settlement	Urban (u) or Rural (r)	Social AoI	Located in the 2 km Environmental AoI	Residential areas distance to Project components	Relevance to the Project
						Project area during construction, operation and decommissioning stages. Potential impacts associated with land acquisition for the substation and underground transmission line. Potential
Pilu Commune	**Pilu**	r	Direct	No	Over than 2.5 km from the NE part of the Project site	The Project overlaps with the administrative area of the Commune. DN79A, the main access road for fhe commune, will be used for Project-related transportation.
	Vărșand	r	Direct	No	Over 9 km from the NE part of the Project site	
Socodor Commune	**Socodor**	r	Indirect	No	4 km SE from the Project area	Potentially impacted by traffic impacts. Land users of plots SE from the PV area potentially impacted by accidental damages during construction/ operation.

With reference to the Project Dama ESIA, (2023) and SLIP (2026), the following characteristics of the site can relevant to the construction works:

- **Air quality** - Baseline air quality in the areas near the site may be affected by reoccurring traffic congestion and truck lines forming near the Vărşand Border Crossing Point, located approximately 9.4 km north of the Project boundary. The Project airshed is classed as undegraded.

- **Climate -** The average annual temperature is approximately 11ºC. The lowest amounts of precipitation are recorded in winter, when the average value is 38 mm, and summer is the rainiest period and the average amount of precipitation is 65 mm. The average amount of precipitation in the study area is 572.9 mm

- **Noise** – Baseline noise is undisturbed with no significant existing noise sources near the site.

- **Geology -** 0 to 0.4 m b.g.l – topsoil, 0.4,m to 1.2 m b.g.l. – brownish clays, 1.2m to 5.0 m b.g.l - brown-greyish silty clay, below 5,00m - alternating layers of clayey silt, clayey-sandy silt, clayey sand, silty sand and sand

- **Soil type –**

- US 1.01 - eutricambosol vertic-gleic-salsodic (EC st-gc-ss), moderately gleic, with moderate salinization between 50-100 cm, strongly sodicized between 50-100 cm (quality class III);
- US 2.01 - vertosol gleic salsodic (VS st-gc-ss), moderately gleic, with weak salinization between 50-100 cm, strongly sodicized between 50-100 cm (quality class IV);
- US 3.01 - amphigleic-salsodic vertosol (VS st-gc-ss), strongly gleic, with strong stagnogleication, with moderate salinization between 50-100 cm, moderately sodicized between 50-100 cm (quality class IV);
- US 4.01 - amphigleic-salsodic vertosol (VS st-gc-ss), strongly stagnogleic, strongly gleic, with weak salinization between 25-50 cm, moderately sodicized between 25-50 cm (quality class IV);
- US 5.01 - vertosol gleic salsodic (VS st-gc-ss), moderately glaciated, with strong salinization between 50-100 cm, strongly sodicized between 25-50 cm (quality class V);
- US 6.01 - pelosol gleic salsodic (PE st-gc-ss), strongly glaciated, with moderate salinization between 25-50 cm, strongly sodicized between 25-50 cm (quality class IV);
- US 7.01 - amphigleic-alkaline pelosol (PE st-gc-ac), with moderate stagnoglaization, moderate glaciation, with weak salinization below 100 cm, strongly sodicized between 50-100 cm (quality class IV);
- US 8.01 - vertosol gleic stagnosol (SG gc-vs), strong stagnogleic, moderately gleic, with weak salinity between 50-100 cm, strongly sodicized between 50-100 cm (quality class IV);
- US 9.01 - solonetz gleic saline (SN gc-sc), moderately glaciated, with moderate salinization between 25-50 cm, strongly sodicized, between 25-50 cm (quality class V);
- US 10.01 - solonetz gleic vertic saline (SN gc-sc), moderately glaciated, with moderate salinization between 0-25 cm, strongly sodicized between 0-25 cm (quality class V)

- **Soil quality -** class IV, which is defined as "lands with poorly fertile soils, frequently skeletal or with hard rock, at a shallow depth, with varied texture (coarse to fine), strongly affected by degradation phenomena (salination, acidification, erosion, active landslides, excess moisture, etc.), in climatic conditions less favourable for agricultural crops

- **Climatic factors / Natural Hazards** – susceptible to the following natural hazards:

  - Seismicity - intensity grade ‚IV – Largely Observed'
  - Wildfires
  - Extreme rainfall / flooding - linked with occasional short-term accumulation of rainwater on-site due to low drainage quality of the soil
  - River flooding
  - Extreme cold
  - Extreme heat

- **Biodiversity –** key biodiversity features relevant to the site are as follows:

    - The Project is located within Natura 2000 SCI / (ROSAC) and SPA protected sites Câmpia Crișului Alb și Crișului Negru (ROSPA0115) and Nădab - Socodor – Vărșad (ROSCI023). In addition, the Project overlaps a Key Biodiversity Area (KBA) that is also an Important Bird and Biodiversity Area (IBA), known as 'Câmpia Crişurilor' KBA/IBA, with the degree of overlap being ~2.5% of the IBA/KBA.
    - 10 flora species of conservation importance potentially occur in the Project AoI, in terms of the IUCN red data list and these are primarily herbs and mushrooms (fungi) that are typically associated with grassland, wetlands and cultivated land / pasture (see Appendix E for full list)
    - 12 species of birds (mainly raptors and waterbirds), 7 mammals (terrestrial and freshwater species), one species of fish, one reptile species, one amphibian species and 12 invertebrate species in terms of the IUCN red data list (refer to project Dama ESIA, ERM, November 2023, Appendix E for full list)
    - The Project qualifies as CH in terms only of a single physical habitat type, that being Pannonic salt steppes and salt marshes (code 1530*) which qualifies as CH given its regionally EN threat status and most importantly, listing as a 'priority habitat' in Annex I of the EU Habitats Directive.
    - None of the species of flora and fauna considered in the assessment were found to meet the qualifying criteria and thresholds for CH.
    - Numerous species of flora and fauna were identified as PBF for the Project, qualifying under multiple criteria including those related to priority species (i.e. threatened/protected species at global/regional/national levels and migratory species of birds and bats typically). A combined total of 137 species qualify as PBF, including):
        - 110 bird species
        - 4 amphibians
        - 1 reptile
        - 7 mammals
        - 5 invertebrates
        - 10 plants

- **Site Drainage /Water resources** - The site is crossed by multiple drainage channels with a depth of approximately 1 m with the role of preventing flooding of land surfaces. Water pooling on site is collected by the drainage channels and evacuated by the pumps owned by ANIF (land improvements national association).

    - Morilor channel - The main articifial channel at the site and is equipped with dikes on both banks and running alongside national road DN97A.
    - Buderiu channel - an artificial channel, adjacent to the western-northern boundary of the site and crossing the Project site in the central area, uniting with Morilor channel in the central area of the site
    - Poganieru channel- an artificial channel located on the right bank of the Morilor Canal, crossing the Project site north-eastern area on an east-west direction. The

canal drains the surface located in the dammed enclosure created by the dike on the left bank of the Crisului Alb river and the dike on the right bank of the Morilor Canal

Figure 1: Central area of the site

Figure 2: View of a drainage channel in the central area of the site.

Figure 3: Morilor Channel and dikes (left) and adjacent national road DN79A (right

- **Surface water quality –** the water quality sampling indicates elevated level of nitrates, phosphorous, and iron most likely due to past agricultural activities.

Fluvial Flooding – flood is likely at the site and the extent is illustrated in

- Figure 7 below.
- **Groundwater -** Groundwater was encountered in all 42 soil borings performed on-site at depths between 1.8 m to 4 m b.g.l.. In the area of the Project substation, groundwater was encountered at depths between 2.0m-2.2m b.g.l. There are no hydrogeological or sanitary protection areas within the area of the Project or in the surrounding areas included in Pilu and Grăniceri communes.

During the planning phase, the Project design was refined to minimise ecological impacts, resulting in the exclusion of plots 9, 10 and 11 from the development layout and their allocation for biodiversity enhancement purposes, as presented in the figures 8 a and b.

The project location and receptor mapping are provided in Figure 4, Figure 5 and Figure 6.

Figure 4: Overview of the location of the Project in the wider region (source: Project Dama PV ESIA, 2023)

Figure 5: Project Receptors (source: Project Dama PV ESIA, 2023)

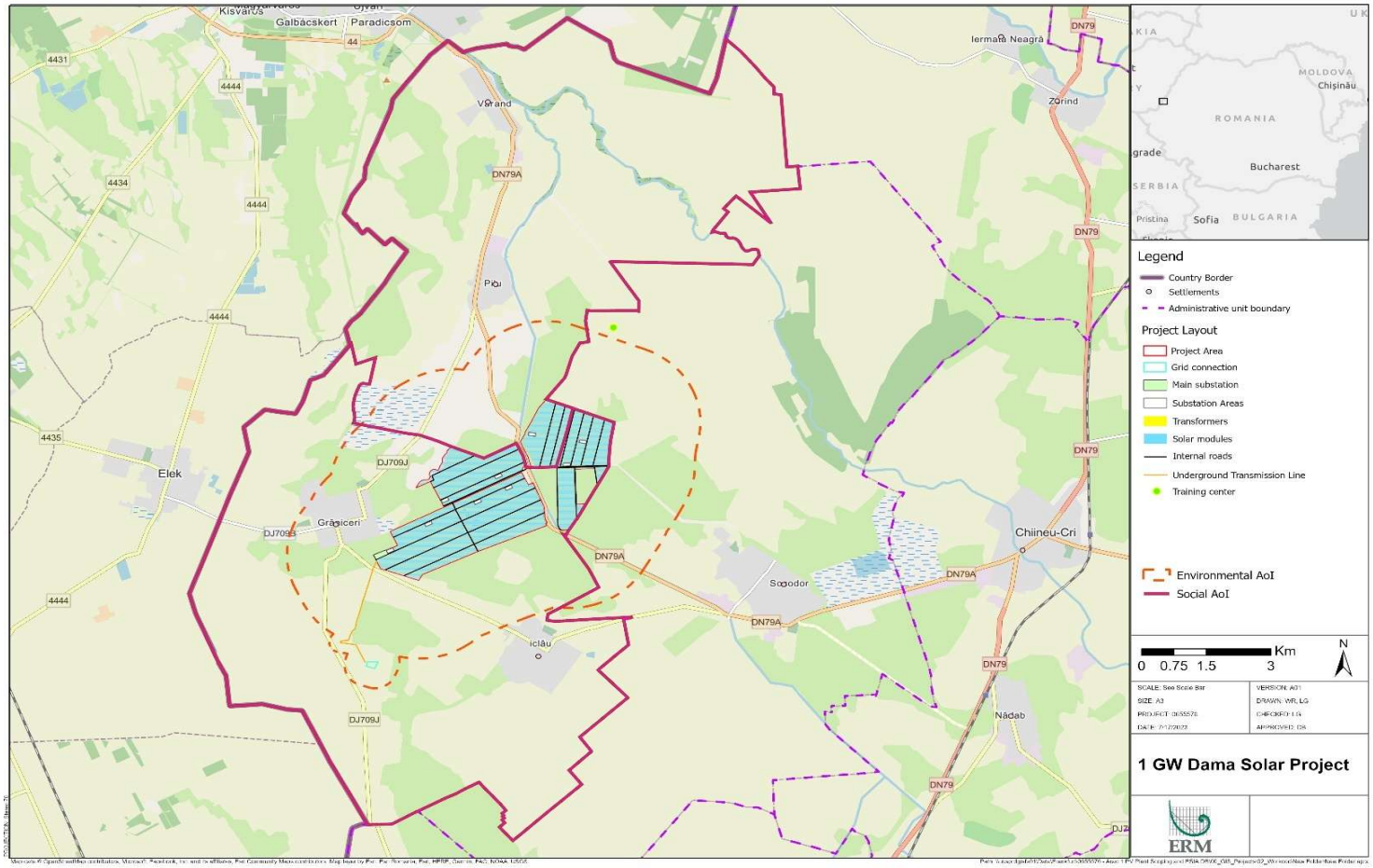


Figure 6Road network in the Project Area (source: Project Dama PV ESIA, 2023)

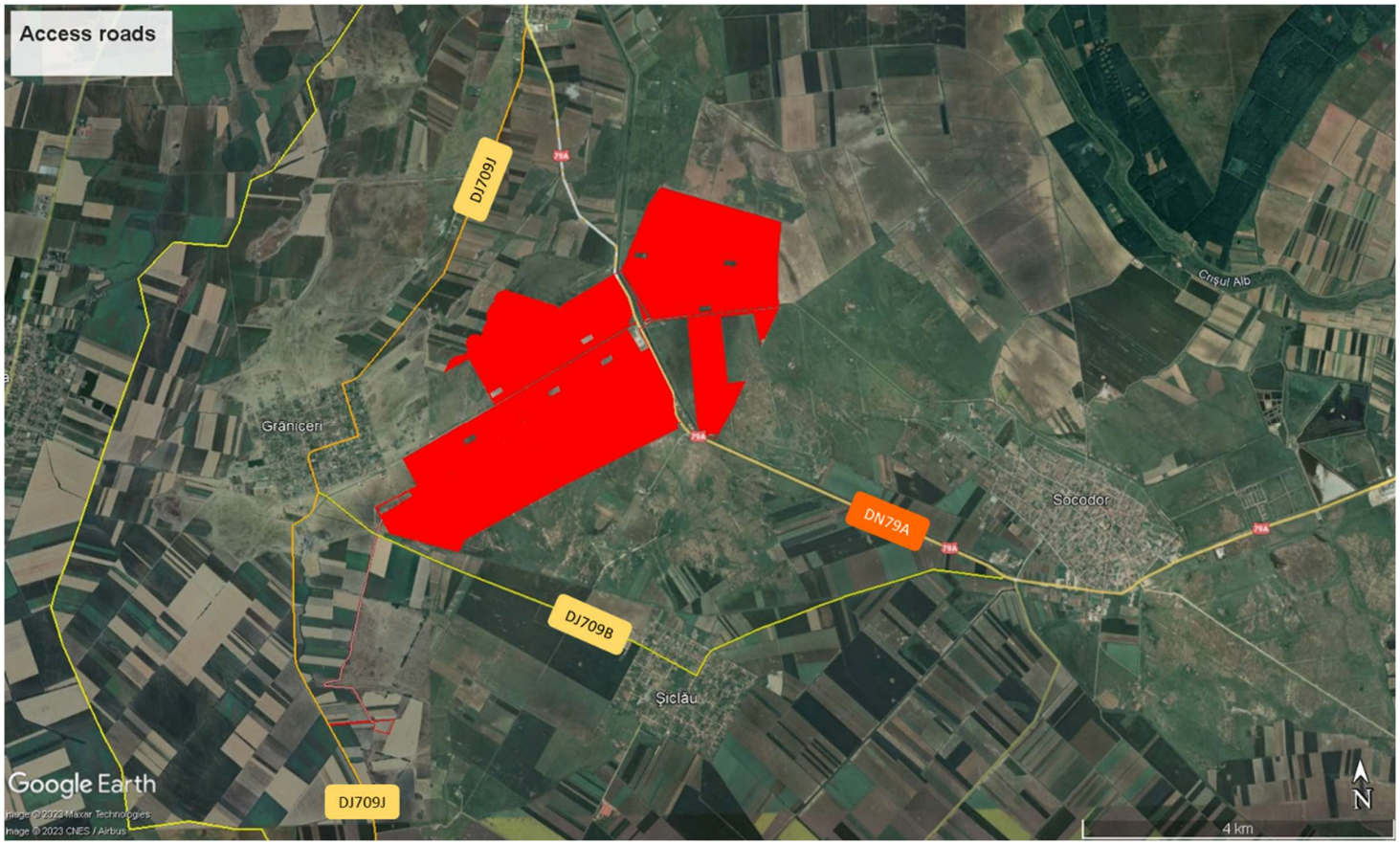
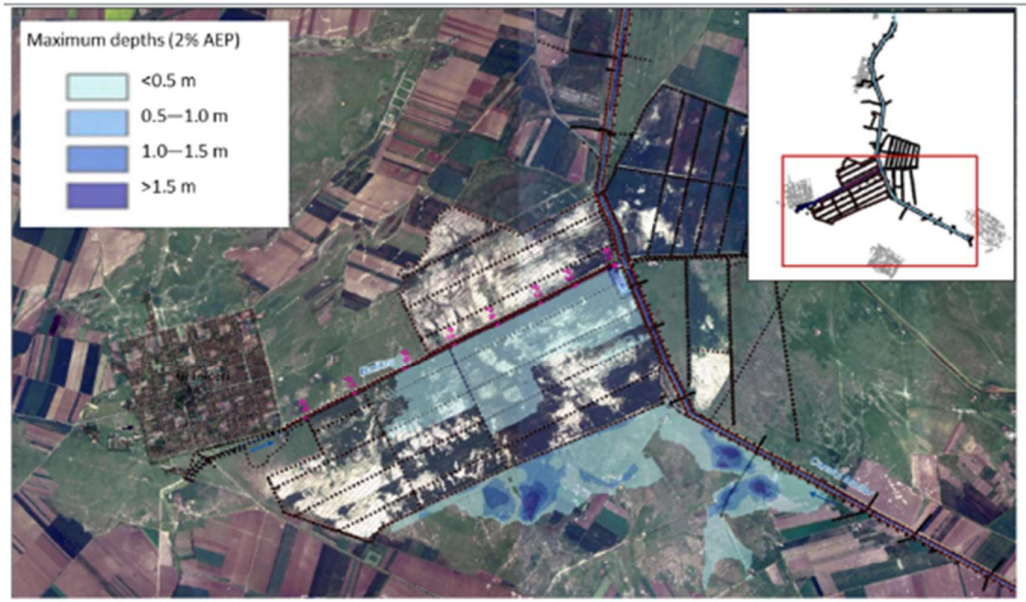
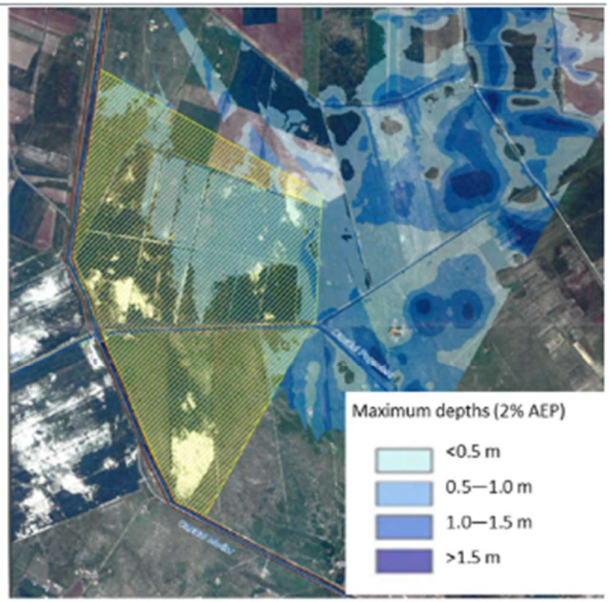


Figure 7: Fluvial flooding (2% change of occurring)

2% AEP (has a 2% chance of occurring in any given year)





- In the central area of the site, flooding occurs across less than half of the Project areas South of Morilor and Budieru channels.
- Approximately 1/3 of Project areas east of Morilor channel and north of Poganieru channel are affected by floods, in the central Project area and near the northern and eastern boundaries.
- Water depth ranges between <0.5 and 1 m. Most of the affected areas are below 0.5 m water depth. Limited areas near the eastern boundary of the Project may reach depths between 0.5 and 1 m.
- Areas outside the Project boundary (south and east) are affected by floods with water depths ranging from 0.5 to >1.5 m.

Sources: 1. *„Flood study for the site located at Grăniceri village, Grăniceri Commune, Arad County" produced by the National Hydrology and Water Management Institute (INHGA), Contract no. 34/28.09.2020.* 2. *Flood study for flood risk assessment in the event of the occurrence of floods with maximum flows with different probabilities of overflow in the area of the Arad 1 project of West Power Investmnets (Vol 1) produced by the National Hydrology and Water Management Institute (INHGA), April 2022.*

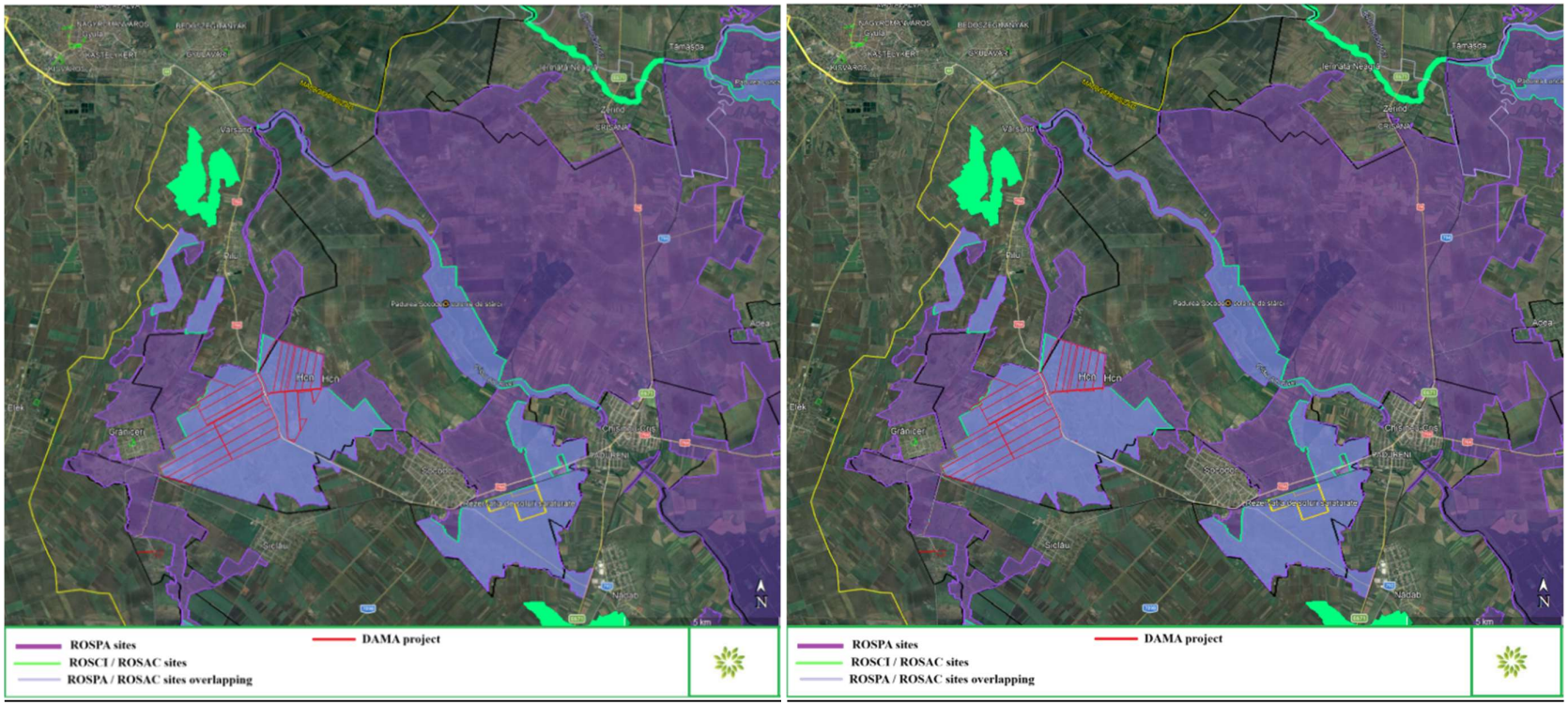


Figure 8 a Initial project location and layout and b. Adjusted layout - Exclusion of land plots 9, 10 11 from the project design

1.5 Summary of Project Components

The PV plant will have an approximate capacity of 1,044 MW, divided in 9 Solar PV Groups of around 118 MW power each. Each group will include 24 electricity-producing basic units (blocks) of approximately 5 MW.

Electrical strings will have 26 modules each and will be mounted in substructures units of three different sizes according to the number of strings: one string (26 PV modules), two strings (52 PV modules) and three strings (78 PV modules), as shown in the figure below:

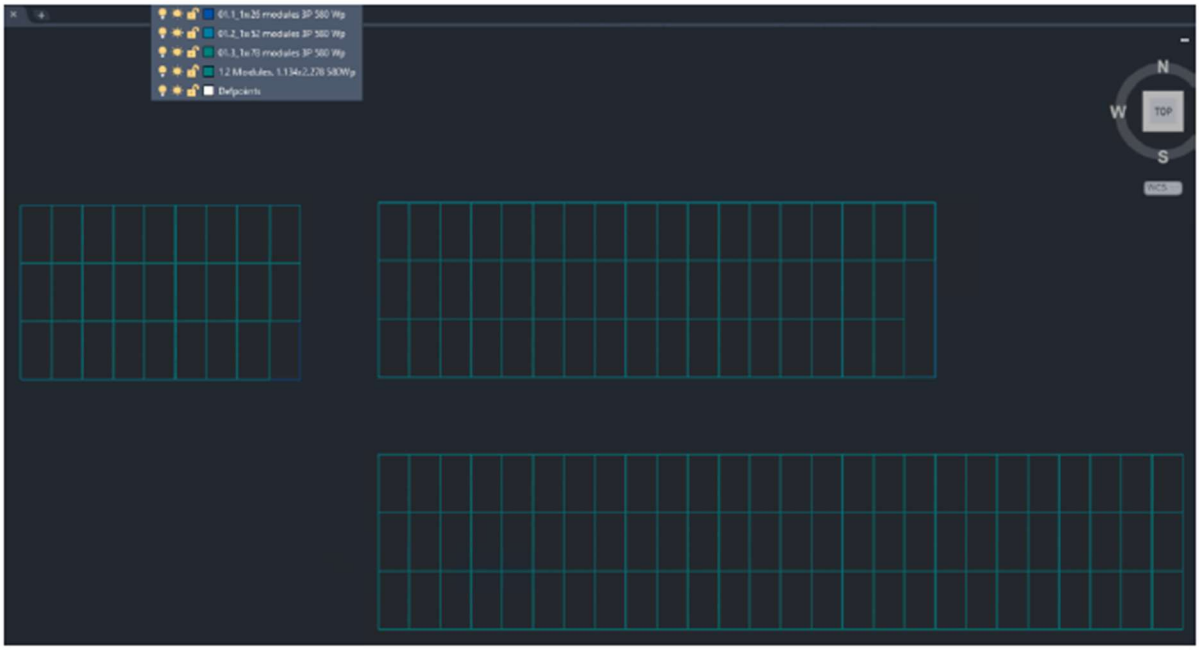


Figure 9 PV Substructure Size

The distance between rows of photovoltaic panels will be at least 2 m, and the photovoltaic panels will be installed at an average height of 1 m above ground level. A buffer zone of 7 meters will be established between the photovoltaic panels and perimeter fence.

The main components of an PV project are as follows[2]:

- Bi-facial 580 Wp PV modules (silicon-based mono- or polycrystalline PV technology) grouped into 24 units (blocks) of approximately 5MW,
- Mounting system - metallic or concrete-based fixed substructures between 1.5 m and 3.75 m above ground level.
- Inverters - Low voltage DC to AC conversion system to transfer the energy produced by PV modules into the inverters (approximately 3300 pieces) and then AC circuits, which will allow the transmission of electricity from the inverters into the LV/MV substations.

[2] Summarized from Dama project ESIA, ERM (November 2023)

- Medium voltage system -LV/33 kV Transformer substations that will raise the low voltage to medium voltage using LV/MV power transformers, with protective and switching auxiliary equipment and transfer to main HV substation via underground cable.
- High voltage system consisting of:
    - 110/400 kV Transformer/s to raise the 110 kV voltage to the 400 kV grid voltage
    - 400 kV line-transformer block cells equipped with circuit breakers, separators, voltage/current transformers, arresters, etc.;
    - transformers for supplying internal services;
    - generators for supplying internal services as backup sources; secondary circuit cabinets;
    - earthing installation;
    - lightning arrester installation;
    - lighting installation, sockets, air conditioning and heating;
    - security system

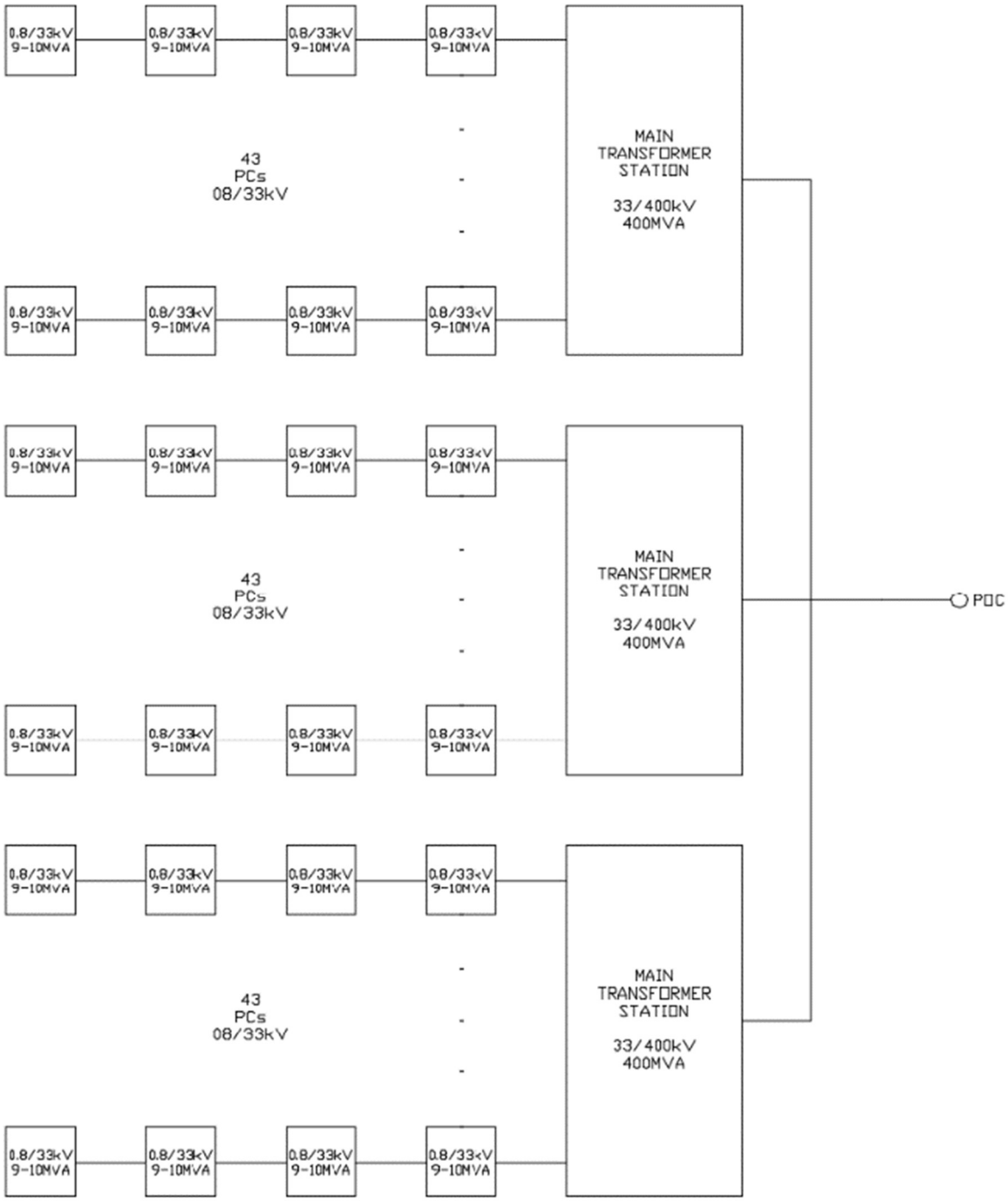


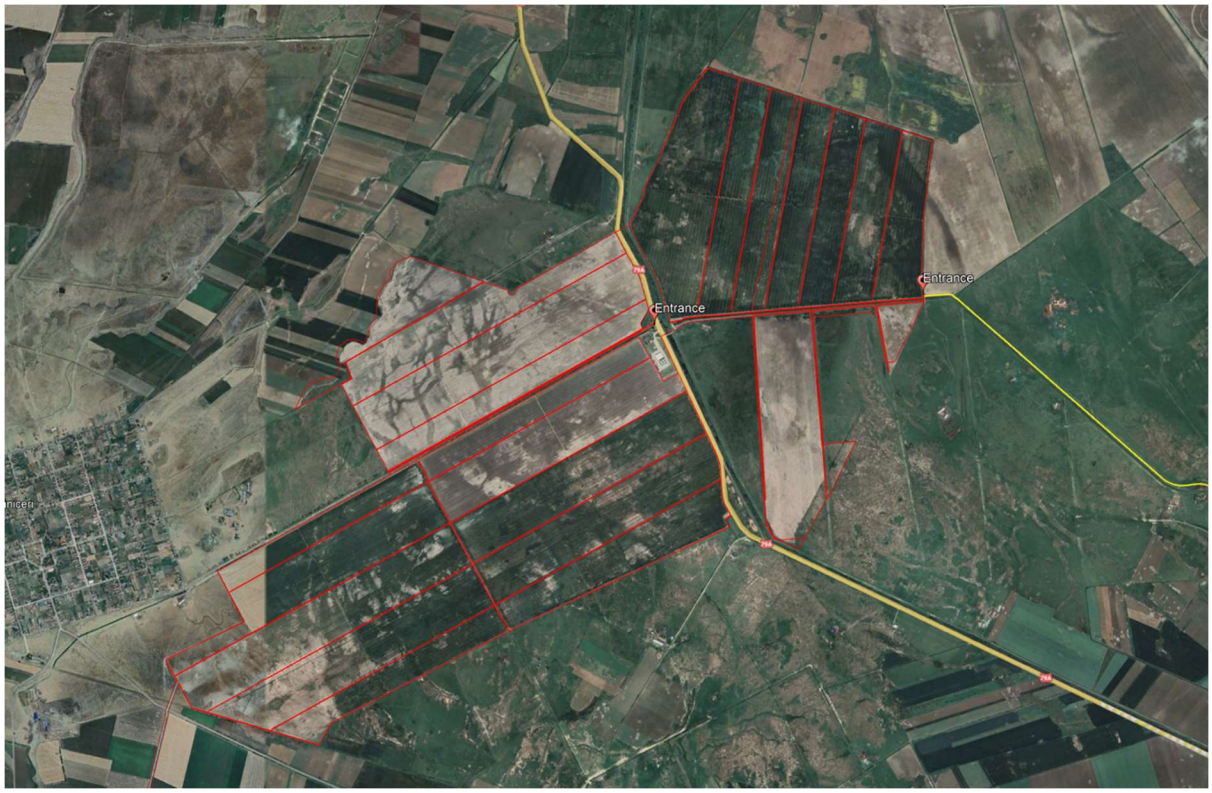
Figure 10 Project Block Diagram

- Grid connection substation and 400 KV underground cable
    - New 400kV substation and 400KV underground cable connecting to the Nadab-Bekescsaba 400 kV high voltage overhead line operated by Transelectrica S.A., the

Romanian Transmission System Operator (TSO), located approximately 2.5 km south of the Project PV plant

- Internal access roads (new and rehabilitated existing roads and bridges) approximately 4m in width.
- External access road consolidated from existing roads as follows:
    - For the access routes from Socodor village (Socodor commune) to the SE part of the PV area for communal road and six exploitation roads (DE158/1; DE 177/1; DE 502/1; DE 325/5; DE 249; DE 323/1;
    - For the access from county Road DJ 709J in Graniceri village to the substation area, for communal road DE 553/1 for a total surface of 8,961 m^2 to be temporarily used
- Fencing will be installed along specific boundaries of the site. The fence will consist of panels or mesh, fixed on pipe poles, with a foundation. Between the lower part of the fence and the ground a space of 20 cm will be left free to allow the free movement of terrestrial fauna. At the top it will be provided with 3 rows of barbed wire. The pedestrian access gates will be made of pipes with fence panels. The height of the fence will be about 2.5 m for mesh panels and about 25 cm for wire barbed. The fencing will not be electrified
- Project Administrative centre including project management office, public information desk, education & training centre, recruiting and hire office, press and marketing desk, storage & logistic desk.

Figure 11: Overview of the site layout (source: Project Dama ESIA, 2023)



Source: ERM, using client data and Google Earth Pro

During construction, Project Dama Project will have two access points. The access point for the west part of the project is from road DN79A, located at coordinates 46°32'0.22"N, 21°21'38.34"E.

The access point for the east side is located at coordinates 46°32'7.93"N, 21°23'7.08"E. The access points are indicated in the figure below.

The EPC Contractor will use the power connection of the existing Agricola Graniceri compound under approval of the Project Company.

Figure 12: Expected layout of Administrative Centre (source: Project Dama ESIA, 2023)

1.6 Project development

During construction The Project will employ approximately 500 workers during construction (all phases), with up to 50 people required to ensure operational maintenance of the PV Plant. The Phase 1 Contractor labour management plan will provide more detailed information on actual planned worker numbers for phase 1.

1.7 Accommodation, security and utilities (construction)

- **Project Accommodation** - A central temporary work accommodation camp is not planned for the Project. Specific requirements for housing workers in offsite accommodation is provided in section 3.13 below and will be further outlined in the Contractor Accommodation Management Plan.
- **Construction water** - The EPC contractor would be required to obtain water during construction (if / as needed) from a legal source, with consumption measurements and reporting in place.

- **Drinking water** – The EPC contractor will supply drinking water in bottles, refer to section 3.9 for owner requirements for water supply.

- **Sanitary wastewater** - the EPC contractor must arrange for sanitary wastewater to be collected in mobile sanitary units and collected by certified wastewater disposal companies, refer to section 3.9 for owner requirements.

- **Drainage system** - The National Agency for Land Improvements (ANIF) is operating the two drainage system pumps located near the cereal storage facility of Agricola Grăniceri. When needed, the company liaises with the local authority and ANIF for turning on the pumps; water is evacuated in Canalul Morilor. Secondary channels are under the management of the local authorities. Dama Project will contract ANIF to maintain the waterways and possibly upgrade the pumping stations.

- **Security** - The EPC must provide security provisions in accordance with the requirements set out in section 3.15.
- **Waste** - The following existing waste operators and infrastructure were identified within the area of influence (Arad County):
    - Retim SA - Domestic/municipal waste, construction waste, electrical and electronical waste, glass packaging waste, hazardous waste (packaging containing residues of or contaminated by hazardous substances, absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by hazardous substances, glass, plastic, and wood containing or contaminated with hazardous substances, batteries, and accumulators etc.), large type of wastes, oil and fats, gases in pressure containers (including halons) etc. (https://retim.ro/)

    - FCC Environment Romania – collecting, transportation and storage of wastes: domestic/municipal waste, recyclable waste and hazardous and non-hazardous industrial waste (Servicii (fcc-group.eu)).

- Grup Salubrizare Urbană SA Sucursala Arad - recyclable waste – paper/cardboard, plastic, metal (KMBT_C224-20181210161557 (primariachisineucris.ro)
- DEMECO S.R.L. – authorised for collection, transport and treatment coordination of hazardous and non-hazardous waste, including WEEE, operating nationally and regionally;
- GreenWEEE International S.A. – nationally licensed WEEE collector and recycler, operating through regional collection networks and industrial take-back services;
- Rematholding Co. S.A. – licensed collector and recycler of WEEE, metals and industrial equipment, operating at national level with regional service coverage.
- Authorised CDW treatment operators active in the county, licensed for the crushing, recovery and reuse of inert construction waste - DAG & M.N. SRL, DEMECO SRL, EUROKIPPER SRL, NELBOG SRL, PORR Construct SRL, SELEPETRI Construct SRL, SYLC Con Trans SRL (multiple authorised working points) and TATSTYL Grup SRL.

The contractor waste management plan is recommended, to the extent possible, to use these approved waste management facilities (in case not possible, it is recommended to choose facilities authorised and certified according to legal requirements) and implement waste management strategy in line with the requirements defined in 3.12.

1.8 Land for construction

The following land parcels are secured for the purposes of consturciton work. Any work outside these areas must be approved prior to commencement with the Project Company to ensure the correct permissions and authorisation are in place.

Table 2: Land Plots acquired for the works

Land registry No.	Type of contract	Type of use	Surface (ha)
301896	Concession contract 1985/05.08.2021. Yearly payment from the moment the concession is signed	permanent	3.3000
304187	Right of Use and Servitude Agreement - decision of Graniceri Local Council 11/ 30.01.2023 for E-Distributie Banat. Free of charge.	temporary	0.4800
Plot 324/15	Right of Use and Servitude Agreement - decision of Graniceri Local Council 10/	temporary	0.0156

Land registry No.	Type of contract	Type of use	Surface (ha)
	30.01.2023 for E-Distributie Banat. Free of charge.		
304093	Right of Use and Servitude Agreement no.409/24.03.2022	temporary	0.68
304094		temporary	44.6968

Table 3: Land requirements for different components

Component	Land required	Land owner	Duration	Land owners and users prior to Project land take	Potential impacts	Receptors
PV area	1,060 ha	Agricola Grăniceri Managening SRL	Permanent	▪ Arable land exclusively farmed by Agricola Grăniceri Managening SRL	▪ Dual use – additional grazing area potentially available for local sheepherders during operations/ local beekeepers/ local farmers ▪ Potential accidental damage to neighbouring arable plots if grazing will be allowed on site ▪ Layoffs due to the agribusiness closing down	▪ Local sheep farmers currently leasing pastureland around the PV area ▪ Local beekeepers ▪ Farmers of neighbouring plots ▪ Agricola Grăniceri Managening employees losing their jobs
Grid connection substation 400 kV	3.3 ha	Grăniceri Commune	Permanent	▪ Unproductive land owned by Grăniceri Commune and not used currently	▪ Accidental crop damage to neighbouring crops	▪ Farmers of neighbouring plots

Component	Land required	Land owner	Duration	Land owners and users prior to Project land take	Potential impacts	Receptors
Administrative area	Up to 4 ha	Agricola Grăniceri Managening SRL	Temporary/ Permanent	▪ Administrative area used exclusively by Agricola Grăniceri Managening SRL	▪ Layoffs due to the agribusiness closing down	▪ People interested in professional training and reconversion ▪ Beneficiaries of the Community Centre
Consolidation of access roads to grid substation	8,961 m^2	Grăniceri Commune	Temporary	▪ Technological roads owned by Grăniceri Commune and used by neighbouring arable plots	▪ Access restrictions for users of the technological road ▪ Accidental crop damage	▪ Farmers of neighbouring plots
Underground transmission line (3,450 m)	1.44 ha	Grăniceri Commune	Temporary	▪ Technological roads owned by Grăniceri Commune and used by neighbouring arable plots	▪ Access restrictions for users of the technological road ▪ Accidental crop damage to neighbouring arable plots ▪ Pasture fragmentation and lack of access to 1.75 ha of pasture during	▪ Farmers of neighbouring plots ▪ Sheepherder(s) leasing the pastureland area between the PV area and DJ709B

Component	Land required	Land owner	Duration	Land owners and users prior to Project land take	Potential impacts	Receptors
					works on the transmission line	
Consolidation of access roads from Socodor	Surface is not yet determined	Socodor Commune	Temporary	▪ Technological roads owned by Socodor commune	▪ Access restrictions for users of the technological road crossing the pastureland in Socodor	▪ Socodor sheepherders leasing the pastureland crossed by the technological road

1.9 Regulatory and institutional framework

The Project must be developed per the national and international regulatory framework defined in this section. All Contractor management plans must refer to this framework.

1.9.1 Permit requirements

The Project Company has obtained the following permits:

- Urban Zoning Plan

Construction Permits (including all other permits required by the Urban Certificates, among which environmental permits)A Permit Register was developed and is available as a standalone document (RE_DAMA_ESMP_13_Permitregister). The permit register and will be updated regularly, as needed.

For the construction and commissioning phases, the EPC Contractor is responsible for obtaining and maintaining all other necessary consents for the construction of the Project with the support of the Projet Company if required.

All necessary consents must be obtained and provided to the Project Company before work can commence.

No construction works can commence until the relevant permanent or temporary consent is granted and any community notification period has ended.

The Contractor is responsible for maintaining a "**Permit Matrix"** of consents and authorisations required for the Project. The Contractor is responsible for maintaining the permit matrix and identifying all additional permits required to execute the works.

The Contractor will be responsible for developing a central **"Conditions Matrix"** for monitoring compliance with the requirements of the permits (including those obtained by the Project Company that are relevant to the Contractor scope of work) and authorisations in the form of 'Conditions Matrix'.

Copies of all permits, consents and authorisations must be held on site and copies submitted to the Project Company for their records.

In case modification in the Project design arisethe relevant authorities, including EPA should be notified and theconstruction works shall commence once the Environmental Approval and relevant temporary consent are issued and any community notification period has ended.

1.9.2 National laws

In accordance with the ESIA, the following Laws are relevant to the Project:

Table 4: National Laws relevant to the Project (source: Project Dama ESIA, 2023)

Law	Number	Description	Relevance
Environmental			
Ordinance on Environmental Protection	195/2005	Makes a reference to the Environmental Impact Assessment (EIA) as a means for the protection of natural recourses.	EIA shall be an integral part of the technical documents; the Project execution cannot commence if the EIA procedure is not properly implemented.
Law on Environmental Impact Assessment	292/2018[3]	Defines the procedures for the identification, assessment, and reporting of the environmental impacts of certain proposed projects and associated administrative procedures, required for the decision-making process on *issuing the Environmental Consent by the Ministry of Environment*. The major provisions set out in the Law include: - Principles and strategic elements that are the basis of further environmental legislation; - Right to access information on environmental quality; - Right to information and consultation in decision-making of the public; - Establishment of liabilities regarding environmental quality rehabilitation; - Management regime for hazardous chemicals, wastes, fertilizers, and pesticides; - Protection of natural resources and biodiversity conservation; - Protection of water and aquatic ecosystems;	The Law defines the following EIA phase.

[3] Source: Romanian Legislative Portal LEGE 292 03/12/2018 - Portal Legislativ (just.ro)

Law	Number	Description	Relevance
		- Protection of the atmosphere, climate change, management of environmental noise; - Protection of soil, subsoil and terrestrial ecosystems - Protection of human settlements; - Prerogatives and responsibilities of the environmental protection authorities, central and local authorities, natural and legal persons; - Right to appeal to the administrative or judicial authorities.	
Order on EIA	269/2020	on the approval of the general guide applicable to the stages of the environmental impact assessment procedure, the guide for environmental impact assessment in a transboundary context and other specific guides for different areas and categories of projects	
Law on Waters	107/1996[4]	Stipulates Good surface waters and Groundwater chemical status - the chemical status required to meet the environmental objectives for surface waters and does not exceed environmental quality standards. Sets a requirement for any interventions aimed to improve, rehabilitate, and maintain the water status to be aligned with plans for management of river basins.	Define the need for classification of surface and ground water.

[4] Source: Romanian Legislative Portal LEGE 107 25/09/1996 - Portal Legislativ (just.ro)

Law	Number	Description	Relevance
Law on Ambient Air Quality	104/2011	Transposes EU Directive 2008/50/EC on Ambient Air Quality and Cleaner Air for Europe into national law. The law aims to protect human health and the environment as a whole by regulating measures aimed at maintaining or improving ambient air quality.	Sets out methods and criteria, established at the European level, for the assessment of air quality and provides limit values for pollutants.
Law on Nature Protection	49/2011 amending 57/2007[5]	Law on the regime of natural protected areas, the conservation of natural habitats, wild flora and fauna, amends the previous comprehensive Government Emergency Ordinance 57/2007. Establishes a national ecological network of protected areas.	Regulates that an assessment of impacts deriving from plans / measures / interventions on conservation goals and integrity of the ecological network is compulsory.
Law on Waste	92/2021[6]	Government Emergency Ordinance 92/2021 replaces Law 211/2011 on the waste regime (repealed), and ensured transposition into Romanian legislation of the new EU Waste Directive 2018/851.	Ensures a high level of protection of the environment and of the health of the population through the institution of measures: prevention and reduction of waste generation and management, reduction of the adverse effects and of the general effects determined by the use of resources.
Law on Noise Protection	121/2019[7]	Law on the assessment and management of ambient noise.	Sets obligation for developing measures to reduce noise emitted by the major sources, in particular road and rail traffic aircraft, outdoor and industrial

[5] Source: Romanian Legislative Portal OUG 57 20/06/2007 - Portal Legislativ (just.ro)
[6] Source: Romanian Legislative Portal ORD DE URGENTA 92 19/08/2021 - Portal Legislativ (just.ro)
[7] Source: Romanian Legislative Portal LEGE 121 03/07/2019 - Portal Legislativ (just.ro)

Law	Number	Description	Relevance
			equipment, mobile machinery and other sources of environmental noise pollution and annoyance.
Law on Road Traffic Safety	195/2002[8]	Government Emergency Ordinance 195/2002 on traffic on public roads, with several amendments and additions, was republished as Law 49/2006.	Regulates the rules and behavior of participants in the traffic, signalization, drivers` licensing, vehicles` public safety and maintenance etc.

1.9.3 Land Laws

The following land laws are applicable to the Project:

- Romanian Civil Code establishing the basic rules on real estate transaction and contracts, usufruct rights, tenants' rights and obligations, landowners' rights and obligations towards tenants;
- Law on Cadastre 105/2019; regulates the Cadastre of immovable property, national and cadastral surveys, geodesic and cadastral works as well as acquisition, registration, record keeping, maintenance and use of cadastral data.
- Law 350/2001 on Urban Planning and Land Development, successively amended, last time by Law 151/2019; which establishes the objectives, competences and measures for urban and spatial planning;
- Law no. 247/2005 on property and justice reform and some accompanying measures, with special references on Legal circulation of land;;
- Government Emergency Ordinance 34/2013 on the organization, management and operation of permanent grassland, and amending and supplementing Law 18/1991 on Land Reclamation.
- Law 185/2018 on Property and other Rights, for approval of Government Emergency Ordinance 31/2018 on the amendment and completion of cadastre and real estate advertising Law 7/1996.

1.9.4 Labour and Health and Safety Laws

[8] Source: Romanian Legislative Portal OUG (R) 195 12/12/2002 - Portal Legislativ (just.ro)

Regarding the *regulatory framework of health and safety at work*, the main Romanian legal acts and regulations are:

- Law 53/2003 – the Labour Code;
- Law 319/2006 on health and safety at work; The objective of the Law on Occupational Safety, Health and the Working Environment is to prevent occupational injuries and diseases at the workplace and to protect the working environment.
- Government Decision 1425/2006 including the methodological norms for enforcement and implementation of Law 319/2006, amended
- Law no. 458/2002 (republished) on drinking water quality;
- Order no. 161/2006 for the approval of the Norm regarding the classification of surface water quality in order to establish the ecological status of water bodies;
- GD no. 100/2002 for the approval of the Quality Standards to be met by the surface waters used for drinking water and of the Regulation on the methods of measurement and frequency of sampling and analysis of samples from surface waters intended for the production of drinking water (NTPA-013);
- Order no. 621/2014 on the approval of threshold values for groundwater in Romania;
- GD no. 516/2016 for the amendment of the annex no. 2 to the National Plan for the protection of groundwater against pollution and damage, approved by Government Decision no. 53/2009;
- GD no. 53/2009 for the approval of the National Plan for the protection of groundwater against pollution and damage.

1.9.5 Cultural heritage

National legislation relating to the protection of Cultural Heritage in Romania is summarised in Table 5

Table 5: National legislation in relation to the protection of Cultural Heritage in Romania

Law	Brief Description
No. 1201 / June 6, 2023, Ministry of Development, Public Works and Administration	Strengthening the role of culture and sustainable tourism in economic development, social inclusion, and social innovation and OSI 6.3
Law No 258/2006 - published in the Official Gazette No 603/2006	Governs preventive archaeological research for the discharge of archaeological load and/or archaeological supervision and stipulates it shall be carried out only by specialists certified in archaeology.
Law no. 120 of May 4, 2006 on public monuments The Romanian Parliament	Law regulates the general legal framework for the creation, placement, and administration of public monuments.
Order no. 2682 of June 13, 2003 Official Gazette:	Approval of the Methodological Norms for the classification and record of historical monuments, the List of historical monuments,

Law	Brief Description
24.06.2003 Date of introduction: 21.03.2005	the Analytical File for the record of historical monuments and the Minimum File for the record of historical monuments, with subsequent modifications and additions, with subsequent modifications and additions.
Government Decision no. 1430/2003 Historical monuments Date of publication in the Official Gazette: 18.12.2003 Date of introduction: 21.03.2005	Approves the methodological norms regarding the situations in which the Ministry of Culture and Religions, respectively the local public administration authorities, contribute to cover the costs of protection and intervention works on historical monuments, the proportion of the contribution, the procedures, as well as the conditions that must be met by the owner, other than the state, municipality, city or commune, provided in the annex that is an integral part of this decision.
Minister of Culture, 2392/06.09.2004	Outlines methodology for Archaeological standards and procedures.
Decision no. 610 of May 29, 2003 National cultural heritage Date of publication in the Official Gazette:10.06.2003 Date of introduction: 21.03.2005	Law regarding the procedure for granting credits necessary for carrying out protection works at historical monuments owned by natural or legal persons under private law.
Government Decision no. 493/2004 Category: Historical monuments Date of publication in the Official Gazette:30.04.2004 Date of introduction: 21.03.2005	Approves the Methodology regarding the monitoring of historical monuments included in the World Heritage List
LAW no. 564 of October 19, 2001	According to the law, the repair, current maintenance, enhancement, research, restoration, consolidation and conservation of historical monuments included in the World Heritage List are the responsibility of the owners, administrators or holders of other real rights, as the case may be.
Law 26/2008. Romanian Parliament	This law establishes the general framework necessary for the identification, documentation, research, protection, conservation, promotion, enhancement, transmission and revitalization of intangible cultural heritage elements, a defining characteristic of human communities, as a factor of social cohesion and economic development.
Order of the Minister of Culture and Cults no. 2043/2002 Official Gazette: 29.05.2002 Date of introduction: 21.03.2005	Law regarding the approval of the Regulation on the organization and operation of the National Commission of Historical Monuments. The Department of Historical Monuments and the Financial Budget Department of the Ministry of Culture and Religion, as well as the county departments for culture, cults and national cultural heritage and of Bucharest

Law	Brief Description
	will implement the provisions of this order. Pursuant to the provisions of art. 32 para. (6) and of art. 36 para. (2) from Law no. 422/2001 regarding the protection of historical monuments, as well as art. 11 paragraph (5) from Government Decision no. 28/2001 regarding the organization and operation of the Ministry of Culture and Religion, with subsequent amendments and additions,
Law No. 422/2001 in in the Official Gazette no. 938/2006,	Protects historical monuments and requires approval from County Directorate for Culture for archaeological investigations. As well as the methods of collection, collection, transfer, use and highlighting of the amounts resulting from its application are regulated by the present methodological norms.
Law no. 182 of October 25, 2000 the Parliament of Romania	This law establishes the legal regime of the goods belonging to the movable national cultural heritage, hereinafter referred to as the national cultural heritage, regardless of their owner, by regulating specific protection activities: record keeping, expertise, classification, research, storage, conservation, restoration and placement in value, with a view to democratic access to culture and the transmission of these values to future generations
Ordinance No 43/2000 published in the Official Gazette No 352/2005	Protects archaeological heritage and the declaration of archaeological sites in areas of national interest.
Law 150/1997	ratification of the European Convention for the Protection of Archaeological Heritage (revised), adopted in Valletta on January 16, 1992
Law 451 / 2002	for the ratification of the European Landscape Convention

1.9.5.1.1 National Legislation on Stakeholder Engagement

- Ordinance 195/2005 on environmental protection, with further amendments, and Law 292/2018 on environmental impact assessment , covers the stakeholder consultation and engagement, and stipulates that one of the main principles governing the environmental protection is " Right to information and consultation in decision-making of the public".
- A key provision of the Environmental Impact Assessment (EIA) is to enable stakeholders to participate in environmental decision-making for projects. Thus, Law 292 / 2018 on impact assessment of certain public and private projects on the environment – sets out the permitting competences as well as the list of projects subject to EIA, procedural stages and instructions, including the associated requirements for public consultation and involvement.

- Also, Law 292/2018 on environmental impact assessment of public and private projects – regulates the procedure for issuing the Environmental Agreement.
- The Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters, ratified by Law 86/2000, stipulates that the right of public participation is guaranteed by law.

1.9.6 Project Standards

The following Project standard are applicable to the construction phase works.

Ambient Air quality Standards (AAQS)

The AAQS in force in Romania are set out in Table 6. Pollutants unlikely to be emitted by the project are not considered and have been excluded from the table.

Table 6: Romanian Ambient Air Quality Standards

Pollutant	Averaging period	Value (µg/m³)	Reference
Human Health Criteria			
SO_2	1-hour mean	350	L 104/2011
	24-hour mean	125	L 104/2011
	Annual mean	60	STAS 12574-87
NO_2	1-hour mean	200	L 104/2011
	Annual mean	40	L 104/2011
PM_{10}	24-hour mean	50	L 104/2011
	Annual mean	40	L 104/2011
$PM_{2.5}$	Annual mean	25	L 104/2011
CO	8-hour maximum daily mean	10,000	L 104/2011
Benzene	Annual average	5	L 104/2011
Dust deposition	Month mean	17 g/m²/day	STAS 12574-87
Vegetation criteria			
SO_2	Annual mean	20	L 104/2011
NO_x	Annual mean	30	L 104/2011
Source: Law 104/2011, STAS 12574-87			

The International Finance Corporation (IFC) in its General Environmental, Health, and Safety (EHS) Guidelines requires to apply national legislated standards, or in their absence, the current World Health Organization's (WHO) Air Quality Guidelines. The table below lists the ambient air quality guidelines established by these organizations.

Table 7: IFC/WHO Guidelines on Ambient Air Quality

Pollutant	Averaging Period	Value (µg/m³) (WHO 2000)	Value (µg/m³) (WHO 2021)
NO_2	Annual mean	40 (1)	10
NO_2	1-hour maximum	200 (1)	200
No2	24 hour	-	25
NO_x (ecosystems only)	Annual mean	30 (2)	-

Pollutant	Averaging Period	Value (µg/m³) (WHO 2000)	Value (µg/m³) (WHO 2021)
SO_2	24-hour highest	125 (1)	40
SO_2	10-minute maximum	500 (1)	500
SO_2 (ecosystems only)	Annual mean	20 (2)	-
PM_{10}	Annual mean	20 (1)	15
PM_{10}	24-hour, 4th highest (99th percentile)	50 (1)	45
$PM_{2.5}$	Annual mean	10 (1)	5
$PM_{2.5}$	24-hour	25 (1)	15
O_3	8-hour daily maximum	100 (1)	100
O3	Peak season mean		60
VOCs (as benzene)	Annual mean	1.7 (based on 1:100,000 lifetime cancer risk) (2)	-
CO	1-hour mean	30,000 (2)	35000
CO	8-hour mean	10,000 (2)	10000
CO	24 hous	-	4000

Sources:

1: IFC (2007) General EHS Guidelines: Environmental, Air Emissions and Ambient Air Quality

2: World Health Organization (2000) Air Quality Guidelines for Europe

3: WHO air quality guidelines 2021

Noise Standards

National Permissible noise levels applicable to the communities outside of (and individuals living in protected zones within) the Project boundaries are established by the following regulations:

- STAS 10009/88: Urban Acoustics: Permitted limits of noise levels. The standard considers admissible noise limits within urban areas, differentiated by zones and areas of specific use, and categories of streets.
- Category III (collector) streets have a maximum admissible equivalent level of noise of 65 dB(A).
- Category II (connector) streets have a maximum admissible noise equivalent of 70 dB(A).
- The maximum admissible level of noise, LAeq, at the limit of industrial zones in urban areas is 65 dB(A). Dwellings can be built on streets of different technical categories, or at the limit of zones or areas of a certain use, as long as the maximum noise value is 50 dB(A), measured 2 meters away from the building façade.

Order No. 119/2014 of the Ministry of Health establishes that in protected areas the following maximum limits for noise will be assured:

- During the day, between the hours of 07:00 – 23:00, the level of continuous sound pressure weighted equivalent A (LAeq) must not exceed the value outside the home of 55 dB(A);
- During the night, between the hours of 23:00-7:00, the level of continuous sound pressure weighted equivalent A (LAeq) must not exceed the value outside the home of 45 dB(A).

1.9.7 Lender standards, international and EU provisions and guidelines

The Project is required to meet the requirements of international lending financing institutions, specifically:

- The European Bank for Reconstruction and Development (EBRD) Environmental and Social Policy 2024 (ESP 2024).

- Sector supply-chain guidance – solar energy[9]
- EBRD Environmental and Social Requirements (PRs)[10]:
    - ESR1 – Assessment and Management of Environmental and Social Risks and Impacts.
    - ESR2 – Labour and Working Conditions.
    - ESR3 – Resource Efficiency and Pollution Prevention and Control.
    - ESR4 – Health, Safety and Security.
    - ESR5 – Land Acquisition, Restrictions on Land Use and Involuntary Resettlement.
    - ESR6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources.
    - ESR 8 – Cultural heritage
    - ESR10 –Stakeholder Engagement.
- World Bank Group Environment, Health and Safety (EHS) Guidelines (General and Industry Sector):
    - General EHS Guidelines (April 2007) which cover four areas of GIIP: Environmental; Occupational health & safety (OHS); Community health & safety (CHS); Construction and decommissioning
    - EHS Guidelines for Electric Power Transmission and Distribution (April 2007)
- Equator Principles

[9] https://www.ebrd.com/content/dam/ebrd_dxp/assets/pdfs/financial-institution/sustainable-finance/environmental-and-social-risk-management/issues/Solar-sector-supply-chain-guidance.pdf

[10] EBRD ESP 2024 and Environmental and Social Requirements.

- IFC Performance Standards
    - PS1 – Assessment and Management of Environmental and Social Risks and Impact.
    - PS2 – Labour and Working Conditions.
    - PS3 – Resource Efficiency and Pollution Prevention l.
    - PS4 – Community Health, Safety and Security.
    - PS5 – Land Acquisition and Involuntary Resettlement.
    - PS6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources.
    - PS8 - Cultural Heritage.
- International conventions and agreements for the protection and conservation of the environment include:
    - Kyoto protocol on Climate Change (UNFCC)
    - United Nations Framework Convention on Biodiversity 1992
    - Basel Convention
    - International Union for Conservation of Natural Resources Red List of Threatened Species
    - Directive 2008/50/EC Ambient Air Quality Directive;
    - United Nations Framework Convention on Climate Change (New York, 1992) (Official Gazette of RM no. 61/97);
    - Convention on Biological Diversity (Official Gazette of RM no. 54/97);
    - Convention for the Protection of the European Wildlife and Natural Habitats (Bern, 1972) (Official Gazette of RM no. 49/97);
    - Water Framework Directive 2000/60/EC;
    - Directive 2009/147/EC on the conservation of wild birds and Council Directive 92/43/EEC on the conservation of natural habitats and wild flora and fauna;
    - EU Nature Restoration Law (Regulation (EU) 2024/1991) – Legally binding targets to restore 30% of degraded ecosystems by 2030
    - Directive on Environmental Quality Standards in the Water Policy 2008/105/EC amended by Directive 2013/39/EU updates priority substances.
    - Fundamental conventions and instruments of the International Labour Organisation (ILO) and United Nations' (UN)[11]

[11] https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11200:0::NO::P11200_COUNTRY_ID:103555

All other EU legislation applicable to the project and transposed at national level.

The Project will also refer to relevant Good International Practice (GIP), including, but not limited to:

- Voluntary Principles on Security and Human Rights (est. 2000); (http://www.voluntaryprinciples.org/).
- United Nations Guiding Principles for "Protect, Respect and Remedy" Human Rights Framework (2011); (https://www.business-humanrights.org/en/un-secretary-generals-special-representative-on-business-human-rights/un-protect-respect-and-remedy-framework-and-guiding-principles).
- United Nations Code of Conduct for Law Enforcement Officials; and (https://www.un.org/ruleoflaw/blog/document/code-of-conduct-for-law-enforcement-officials/).
- United Nations Basic Principles on the Use of Force and Firearms by Law Enforcement Officials (1990).
- IFC Good practice note: Use of Security Forces: Assessing and Managing Risks and Impacts (February 2017).
- Worker's Accommodation: Processes and Standards (Guidance Note by IFC and EBRD, 2009).
- Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets (IFC, 2007).
- OECD Due Diligence Guidance for Responsible Business Conduct (2018).

All Project Company and Contractor plans must refer to this framework.

1.10 Institutional arrangements

Institutional arrangements for implementation are held with the bodies listed below and described in the following sections:

- Project Sponsor – Rezolv Energy - The main activities of the Project Sponsor are the development and operation of renewable energy projects in Europe.
- Project Company – West Power Investments SRL - ensure operational compliance as per the EBRD PRs as defined Project Appraisal Document, Financing Agreement Operations Manual and Government policies as applicable (see below for further explanation).
- Engineering Procurement Construction (EPC) Contractor - TBC
- Investment - TBC

A Project Director will lead the Project Company and will include a team of specialized staff responsible for project management, financial management, procurement, environmental management, social management, monitoring and evaluation and contract management, as well as support staff such as a secretary, legal support, fiduciary support staff and a driver.

The Project Company will recruit specialized consultants for specific technical assistance to implement activities. The Project Company will liaise closely and ensure overall coordination of all Project entities to ensure necessary data and information are shared and collated for reporting to the Project Board and the Investment Agencies.

Specific arrangements for implementing this CESMP will fall to the Project Company Environmental and Social Specialist. These will include:

- Oversee the implementation of all steps presented in this ESMP.
- Ensure project activities follow the EBRD ESRs, WBG EHS Guidelines, and national policies and procedures.
- Develop Project Company E&S Management Plans
- Review and approve site-specific construction environmental and social management plans before the commencement of works.
- Establish effective grievance mechanism; liaison with other agencies, contractors, and engineering supervisors at the regional level; monitoring and evaluation; and training.
- Provide regular supervision (oversight, monitoring and identifying issues of non-compliance or adverse trends) of the effectiveness of the social and environmental mitigation measures foreseen by site-specific construction ESMPs.
- Based on the requested monitoring frequency, submit an environmental and social monitoring report for the SPV Project Company activities to the Lenders/EBRD, IFC.
- Provide advice and guidance to contractors on social and environmental issues where appropriate.
- Overseeing E&S obligations of the ESIA, framework ESMP, and Commitments registry, and Construction and Operational Environmental and Social Management Plan (CESMP & OESMP).
- Oversee procurement requirements of the Project, including compliance with the E&S requirements of this Project and ensure compliance of the suppliers/contractors with the supply chain requirements (capturing national and EBRD/IFC requirements)
- Coordinate construction Monitoring audits (third-party audits) of construction activities by Environmental, Health and Safety, Social, and Labor (EHSS) specialists as defined by the Loan agreement
- preparing quarterly compliance monitoring reports and formally communicating with the EBRD/IFC on environmental and social matters.

- overseeing stakeholder engagement activities undertaken by the Community Relations/Liaisons Manager for sub-projects
- reporting to the Project Company on the implementation of project activities and the implementation of the Grievance Mechanism

The Project Company will oversee communication requirements and implementation of the grievance mechanism related to the Project. Specific tasks may include:

- Working with the Contractor to make necessary notifications to their staff and stakeholders as per the Project SEP
- ensure that E&S issues are adequately communicated to relevant stakeholders
- provide updates to the media on any Activity
- coordinate the implementation of grievance redress, monitoring, and reporting (as defined in the Project SEP).

1.10.1 Contractor

The Contractor will be responsible for preparing the Contractor management plans (for approval by the Project Company), preparing documentation for any temporary consents and permits, and implementing their scope of works following this CESMP. General requirements include:

- Project manage, design and provide equipment (unless stated otherwise) for the required works following the design specification and this CESMP.
- Prepare the project supporting plans following this CESMP.
- Outsourcing detailed studies to consultants for any specific assessments required (e.g., biodiversity monitoring) and managing and ensuring the delivery of such outsourced tasks.
- Provide suitable PPE for all workers on site.
- Adhere to any restrictions applied to manage the safety of receptors in the community.
- Accept, protect, and stage incoming deliveries of materials and products to be used.

The Contractor shall prepare and submit to the Project Manager for approval the **Contractor's Environmental and Social Management Plan (C-ESMP),** which must provide a detailed explanation of how the Contractor shall comply with the project's safeguards requirements stated in this CESMP and as provided as part of the bidding documents. Once accepted by the Project Company, the C-ESMP will be publicly disclosed by Project Manager through the project web site and/or other means that the Employer may deem appropriate.

The Contractor shall not commence any civil works or pre-construction activities (e.g. clearance for haul roads, site access roads and work site establishment) until the Project Manager has approved the contractor C-ESMP. With the agreement of the Project Manager, a staged C-ESMP may be prepared addressing specific agreed activities (e.g. mobilization). However, activities cannot commence until they have been addressed in the C-ESMP, and civil works cannot commence until the final C-ESMP has been submitted, approved, and publicly disclosed.

The Contractor shall carry out the project following the approved C-ESMP.

2 Environmental and Social Management System

2.1 Corporate plans and procedures

The Project Sponsor will share the following Corporate plans setting out requirements for the Project as follows:

- Anti bribery and anti-corruption policy
- Equal opportunity and anti-discrimination policy
- Speak up Policy
- Code of conduct and Ethics
- Partner Code of Conduct
- Contracts and procurement policy
- Recruitment policy
- Health and Safety Policy
- Health and Safety policy for outside the workplace and site visits

2.2 Project Company Environmental and Social Management System (ESMS) and Policies

The Project Company has established an environmental and social management system (ESMS) to oversee the development, and construction activities of the Project. The Project ESMS is composed of the project policies and project-specific management plans as follows:

Plan / sub-plan name	Reference[12]
Project Environmental and Social Policy	RE_DAMA_ESMP_01_E&S_Policy
Project Health, Safety and Security Policy	RE_DAMA_ESMP_02_HS&S Policy

[12] For latest version number for each plan and sub-plan, please refer (DAMA_ESMS_Forms_ - Register of project documentation (DAMA_ESMS_Forms_F10)

Construction Environmental and Social Management Plan (CESMP)	RE_DAMA_ESMP (construction)
Environmental Management Plan (including noise, dust, hazardous materials, effluent wastewater)	RE_DAMA_ESMP_03_EMP
Waste Management Plan (WMP)	RE_DAMA_ESMP_05_WMP
Labour Management Plan (LMP)	RE_DAMA_ESMP_06_LMP
Chance Finds Procedure (CFP)	RE_DAMA_ESMP_07_CFP
Stakeholder Engagement Plan (SEP) including community grievance mechanism	RE_DAMA_ESMP_08_SEP
Occupational Health and Safety sub-plan (OHS)	RE_DAMA_ESMP_09a_OHSM
Social Management Plan (SoMP) ,	RE_DAMA_ESMP_09b_SoMP
Security Management Plan (SeMP)	RE_DAMA_ESMP_09c_SeMP
Traffic Management Plan (TMP)	RE_DAMA_ESMP_10_TMP V0
Emergency Preparedness and Response sub-plan (EPRP)	RE_DAMA_ESMP_11_EPRP
Contractor Management Plan (CoMP)	RE_DAMA_ESMP_12_Contractor_Management_Plan_v0
Permit Register	RE_DAMA_ESMP_13_Permitregister
Management of Change Procedure	Work in progress
Legislation Register	DAMA_ESMS_F01
Permits matrix / register	DAMA_ESMS_F02
Conditions matrix	DAMA_ESMS_F03
Inspection and Audit Plan	DAMA_ESMS_F04
Training matrix	DAMA_ESMS_F05
Monitoring Matrix	DAMA_ESMS_F06

Monthly E&S Reporting	DAMA_ESMS_F07
Incident reporting	DAMA_ESMS_F08
Corrective Action tracker	DAMA_ESMS_F09
Register of Project Documents	DAMA_ESMS_F010
Community Grievance Form	DAMA_ESMS_F014
Community Grievance Log	DAMA_ESMS_F015
External Consultation log	DAMA_ESMS_F016
Register of Impacts	DAMA_ESMS_F017

The ESMS is aligned with the requirements of ISO14001 environmental management and ISO 45001 Occupational Health and Safety management.

An induction training on Environmental and Social Management of the DAMA project, including training plan (including biodiversity conservation) will be delivered to EPC contractors. Also, the ESG manager will provide support to EPC contractors whenever needed during the construction phase in relation to specific environmental and social aspects.

Section 3.3. mentions the topics specific requirements for the Contractor.

2.3 Roles and responsibilities

All Project Employees, Contractors, and subcontractors working on behalf of the Project Company are individually and collectively responsible for:

- Their safety, as well as that of others and the impact their activities have on the environment;
- Understanding and working within the guidelines and requirements established by the Project Sponsors Policies;
- Supporting the environmental and social policies established by the Project Company in the day-to-day performance of their work; and
- Notifying their supervisors, including EPC HSE officers and/or Community Liaison Officer (as relevant), of any observed incidents, community issues, equipment malfunctions, unsafe or unhealthy situations, improper acts, etc.

2.3.1 Project Company roles

The Project Company will define the following roles within its corporate governance organisation:

- Community Liaison Officer
- Environmental and Social (E&S) Manager – internal and an external ESG manager will be contracted to support and oversee the project construction period
- Health, Safety, and Environment (HSE) Manager

2.3.2 Project Company responsibilities

The E&S Manager will have an advanced qualification in environmental and social sciences and be able to demonstrate experience working on construction projects to national and Lender standards outlined in section 1.5. the

The Project Company E&S Manager will have the following responsibilities:

- Overall responsibility for overseeing the environmental and social management of Project activities, as set out in this ESMP and Lenders obligations;
- Ensure sufficient resources are available to implement Project Company obligations;
- Oversee Contractor compliance with Project Company's ESMP and environmental and social policies through audits and reviews;
- Manage all external communication with the local community relating to Project activities
- Manage the community grievance mechanism; and
- Report on environmental and social performance to Lenders and other interested stakeholders.

Table 89 elaborates on the responsibilities of the wider implementation team as they relate to E&S matters. These roles may be augmented as necessary depending on the project's needs.

Table 8: ESG roles and responsibilities

Role	E&S Responsibility
Project Director (home/site based)	• Overall responsibility for ensuring the implementation of Project Company CESMP; • Secure financial and human resources required to implement the CESMP; and • Nominate personnel to assist the Site Manager and CLO as required.
Site Manager (site-based)	• Oversee and ensure the implementation of CESMP by the Contractor (including all subcontractors); • Oversee and report Contractor's E&S performance to the Construction Director and PIT; • Attend regular HSE meetings with Contractor; • Provide support to CLO to manage community issues and any grievances; • Coordinate regular audits and inspections to check that committed impact mitigation measures are being implemented; and • Compile monthly reports in accordance with requirements of this CESMP.
- ESG manager	• Oversee and verify EPC and subcontractor compliance with all E&S requirements, including the ESMPs (incl Labour Management Plan, Community Health & Safety Plan, Emergency Response, Traffic Management, Waste Management, Water Management, Pollution Prevention and Control, Chance Finds etc) • Ensure all plans stay aligned with design updates, construction sequencing and permitting conditions. • Monitor implementation of the lender Environmental and Social Action Plan (ESAP) and flag any emerging risks early to the Corporate Sustainability team. • Ensure full compliance with national environmental permits and conditions • Carry out regular site inspections, follow-up visits and spot checks (minimum twice per week). • Identify, assess and track E&S risks and opportunities across construction activities, propose practical mitigation measures in line with ESIA and ESAP and follow them through with the EPC contractor until closure. • Provide timely risk updates and early warning notes to the Project Owner. • Work with biodiversity specialists to ensure all monitoring, surveys, seasonal restrictions and BAP actions are delivered (project will appoint own Biodiversity specialist who E&S consultant will be required to work closely and liaise with).

Role	E&S Responsibility
	• Verify ecological protection measures including buffer zones, restricted areas, habitat protection and vegetation management working closely with Owner and contractor biodiversity teams. • Support implementation of the Stakeholder Engagement Plan (SEP) and maintain constructive working relations with communities, landowners and local authorities. • Work closely with the Project Community Liaison Officer (CLO) to monitor grievances, ensure timely resolution, distribute project updates and ensure stakeholder meetings are held as required. • Maintain the external engagement log and ensure transparent communication on construction impacts. • Ensure that GBVH prevention and response requirements are applied on site by verifying contractor training, awareness measures and reporting channels, while overall responsibility for GBVH remains with the Owner. • Participate in worker accommodation checks to verify compliance with project requirements and IFC/EBRD standards. • Deliver E&S inductions and targeted training to EPC and subcontractors as needed and build capacity within site teams on ESMP implementation, risk controls, grievance handling and incident management. • Support all internal and external audits, including quarterly IESC monitoring and labour audits. • Prepare corrective action plans and track closure of all findings working closely with contractor E&S teams • Maintain and update E&S registers and matrices (permits, training, monitoring, grievances, inspections) as required. • Participate in all relevant project meetings (EPC coordination, weekly progress, E&S meetings, biodiversity coordination, CLO/community meetings, and lender/IESC sessions) as required by the Owner to ensure E&S issues are identified, raised and addressed in a timely manner. •
Health and Safety Manager	• Coordinate the implementation of the specific H&S Plan • Ensure legal and client compliance (applicable H&S legislation, EPC and subcontractor compliance, site rules, PPE standards, H&S signage, and welfare provisions). • Monitor site H&S performance and conduct inspections/audits (daily walkdowns, toolbox talks, behavioural safety, corrective actions, tracking KPIs and close-out of findings). • Manage incidents and emergency preparedness (incident/near-miss reporting and investigations, root-cause analysis, liaison with authorities as needed, emergency drills and readiness—fire, medical, severe weather). • Prepare reports

Role	E&S Responsibility
Community Liaison Officer	• Manage all communication with community and local stakeholders; • Implement requirements of the Stakeholder Engagement Plan; • Maintain and implement the community grievance mechanism; • As secretary of the Project Stakeholder Committee, convene and arrange regular meetings to maintain regular communication with the broader community; • Liaise with community leaders on project activities; • Support Contractor to engage local labour and verify implementation of Labour Management Plan; • Maintain socio-economic statistics concerning the recruitment of local workers; and • Produce monthly summaries that provide details related to community activities and the worker and community grievance mechanism implementation.
Procurement team	• Coordinate with EPC contractors during procurement processes in order to ensure that Rezolv's policies and procedures are effectively implemented • Compliance, ESG, and risk controls (anti-bribery/ethical procurement, H&S and environmental requirements embedded in contracts, local content requirements where applicable, and supply-chain risk management). • Procure works, services, and materials in line with the construction programme , if the case • Monitor the procurement processes ran by EPC contractors
EPC Contractors	• The EPC contractors will allocate resources to ensure that the project Environmental, Health and Safety and Social commitments / regulatory requirements are fully and effectively implemented • The specific roles are defined in the section below
GBVH – third party (support role)	• Provide training to site staff • Supporting preparation of GBVH induction • Coordinate survivor centric referral mechanism for survivors of project related GBVH. • Receive and process project related GBVH grievances including obtaining informed consent, conducting investigation process and proposing relevant sanctions.
Cultural heritage specialist – third party (support role)	• Support the implementation of the chance finds procedure (if required) • Support with implementation of the cultural heritage management plan. • Support with the archeological discharge of the sites

2.3.3 Contractor roles and responsibilities

The general responsibilities of the Contractor are:

- Prepare detailed site-specific Contractors CESMP (to be approved by Project Company);
- Implement the requirements of the CESMP as defined in this document.
- Obtain and hold all relevant temporary permits, notification of works, and documentation required to support construction works and maintain a permit matrix to oversee the permit obligations of the Project;
- Implement the minimum requirements set out in this ESMP;
- Provide necessary training (contractor team and casual labourers) to implement CESMP requirements;
- Engage at least one full-time HSE Manager to oversee works on site and liaise with the Site Manager and CLO;
- Participate in weekly HSE meetings and prepare/input into weekly/monthly construction progress HSE reports;
- Provide weekly reports on labour statistics for all contractors and third-party contractors on site);
- Notify the Construction Director and provide reports on any HSE incidents;
- Require third-party sub-contractors to implement all requirements of the CESMP;
- Implementing a worker grievance mechanism and worker code of conduct on-site;
- Audit all third-party contractors' ESMS and labour provisions at the outset of the project;
- Support Project Company to implement the Project stakeholder engagement plan (SEP) and community grievance mechanism;
- Support Project Company as needed with communicating project activities to communities.

The Contractor Project Manager is responsible for defining and implementing this CESMP and associated procedures with obligations and requirements of the Project Company's CESMP and local laws and permits. They will:

- Put in place sufficient resources, materials, equipment, and personnel to ensure project construction activities are undertaken safely to avoid and minimise environmental and social impacts;
- Ingrain environmental and social considerations in day-to-day activities and discussions;
- Take part in CESMP reviews to ensure its adequacy and feasibility; and
- Ensure communication of all HSE incidents to the Project Company's Construction Director.

2.4 Contractor General Requirements

2.4.1 General requirements

The Contractor is responsible for environmental and social management, compliance, monitoring, mitigation, and restoration of areas affected by its activities (following Owners CESMP and supporting plans (this document).

The Contractor is responsible for developing a site environment and social management system (ESMS), health and safety management system (HSMS), and all supporting site procedures and method statements to implement the requirements of this CESMP. The Contractor is responsible

for ensuring all sub-contractors have site procedures or method statements to align with this CESMP or work under the lead Contractor ESMS / HSMS.

2.4.2 Contractor policies

All Contractors, sub-contractors and third-party service providers engaged in the Project shall comply with the Project's Policies and associated management plans, procedures and standards.

As a minimum requirement, Contractors shall adopt and implement management systems, codes of conduct and operational procedures that are consistent with, and equivalent in scope and standard to, the Project Policies.

Where Contractors maintain their own corporate policies, these shall be reviewed and, where necessary, aligned to ensure full consistency with the Project's requirements and applicable lender standards.

The Contractor shall be responsible for cascading these obligations to all sub-contractors and suppliers, and for demonstrating compliance through appropriate documentation, training, monitoring and reporting mechanisms.

The Contractor will develop the following Project policies:

- Environment and Social Policy
- Health, Safety and Security Policy

2.4.3 Contractor management plans

The Contractor will review in detail the CESMP (this document) and supporting documents. The Contractor will then prepare, implement, and regularly update a Contractor Environmental & Social Management Plan (C-ESMP).

The Contractor C-ESMP must work as a stand-alone document and establish core elements described in Section 3. It may also include thematic supporting action plans, e.g., waste management. The C-ESMP must also cover the social, labour, community health safety and security risks and impacts defined below. The C-ESMP must contain:

- Institutional/organizational arrangements measures, including the procedure for continued consultation with and participation of affected people during project implementation (this may link to the communication plan), schedule and cost.
- Actions to implement mitigation, including supporting sub-plans, thematic action plans, emergency preparedness, and the grievance redress mechanism.
- Key monitoring and reporting requirements, including key performance indicators.

Over time, the C-ESMP may be supplemented by more detailed contractor management procedures or site method statements; where these are required, they should be stipulated in the C-ESMP.

The C-ESMP must link to the Contractor organization systems or frameworks for implementing E&S management at the site. The C-ESMP may refer some planned development to the Contractor, but this must be clear.

The C-ESMP must be submitted in the draft at least 60 days before mobilisation on-site. The Contractor shall incorporate Project Company comments into the updated C-ESMP within 15 days of receipt.

The Contractor will not undertake any work outside the prior agreed work areas without obtaining permission from the Project Company.

The Contractor must prepare a **Site Plan** indicating the following:

- Key activity areas include waste management, hazardous material control, maintenance, workshops, refuelling, temporary storage, welfare facilities, concrete batching, etc.;
- Highlight the on-site plan position of all sensitive receptors (e.g., nearby residential properties);
- Permitted routes to the site and traffic management requirements;
- Identify Laydown area;
- Location of storage facilities and type of storage (fuel, materials, waste, chemicals); and
- Site vehicle access and delivery points.

2.4.4 Staffing

The Contractor will engage at least one site-based health and safety Manager and one environmental and Social (E&S) Manager to oversee the implementation of the C-ESMP.

The H&S Manager and E&S Manager must be permanently based at the worksite for the duration of the contract. Where appropriate, the Contractor (or their subcontractors) must engage additional HSE officers to provide adequate HSE supervisory coverage on all Work areas of the Project in line with national legislation.

The Contractor is responsible for identifying personnel and other resources responsible for managing HSE implementation, monitoring and reporting.

The Project Company reserves the right to reject any HSE personnel hired by the Contractor (or their sub-contractor) based on qualifications. The Contractor shall provide qualifications of all HSE personnel upon request. As part of the C-ESMP, the Contractor shall consider the environment, labour policy and OHS records when choosing Subcontractors and Suppliers (refer to section 3.4).

2.4.5 Qualifications for Contractor Health and Safety Manager

The Contractor H&S / Environment advisor (s) must have the following qualifications as a minimum:

- Practical experience in acting as a full-time environment, health & safety advisor in the construction/new build /wind energy sector;
- Excellent knowledge of health & safety regulations and
- Experience and/or familiarity with OHSAS 18001, ISO 14001 and ISO 9001.
- Minimum requirements for the performance of this role are:
- Advise workers / sub-contractors on Project-specific environment, health, safety and sustainability issues;
- Responsible for managing all health & safety aspects of sites, including office safety files;

- Actively identify areas for improvement and contribute to plans aimed at reducing the occurrence of incidents;
- Review and update construction phase plans and associated documentation;
- Ensure that site teams are proactive, up to date and comply with current health, safety and environmental legislation, best practices and Project Company standards;
- Undertake monitoring of the health, safety and sustainability processes;
- Thorough investigations of any incidents, providing reports with preventative and corrective actions;
- Develop and maintain a 'continuous improvement' ethos in the approach to health, safety and environmental issues;
- Ensure site-based management is focused on delivering a safe and healthy working environment;
- Regular communication and interaction with the Project Company ES& Specialist, Site Manager, and
- Support and assist project teams and subcontractors in health & safety matters.

2.4.6 Qualifications for Contractor Environmental and Social Manager

The Contractor H&S / Environment advisor (s) must have the following qualifications as a minimum:

- Practical experience in acting as a full-time environment in the construction/new build /wind energy sector;
- Excellent knowledge of health & safety regulations; and
- Experience and/or familiarity with ISO 14001

Minimum requirements for the performance of this role are:

- Advise workers / sub-contractors on Project-specific environment, health, safety and sustainability issues;
- Responsible for managing all health & safety aspects of sites, including office safety files;
- Actively identify areas for improvement and contribute to plans aimed at reducing the occurrence of incidents;
- Review and update construction phase plans and associated documentation;
- Ensure that site teams are proactive, up to date and comply with current health, safety and environmental legislation, best practices and Project Company standards;
- Undertake monitoring of the health, safety and sustainability processes;
- Thorough investigations of any incidents, providing reports with preventative and corrective actions;
- Develop and maintain a 'continuous improvement' ethos in the approach to health, safety and environmental issues;
- Ensure site-based management is focused on delivering a safe and healthy working environment;
- Regular communication and interaction with the Project Company E&S Specialist, and Site Manager;

- Maintain regular and structured communication with the Project's Community Liaison Officer (CLO) to ensure timely identification, registration, assessment and resolution of community grievances;
- Support and assist project teams and subcontractors in health & safety matters.

2.4.7 Employee general responsibilities

All Workers are required to:

- Co-operate with supervisors and managers on health and safety matters;
- Not interfere with anything provided to safeguard their health and safety;
- Take reasonable care of their own health and safety;
- Report all health and safety concerns to an appropriate person (as detailed in this policy statement); and
- Sign Workers Code of Conduct (refer to section **Error! Reference source not found.**).

2.4.8 Assessment of impacts and risks

Under the C-ESMP, the Contractor will undertake a **Job Hazard Analysis (JHA)** for every activity to be performed. The JHA system shall be written, and the Contractor shall make the JHA system available to all its Subcontractors and Suppliers. Specific JHA shall be discussed with all workgroups before starting any work activities at the Project Site using "setting to work briefings/toolbox talks". JHA meetings shall also be conducted any time a work crew starts a new task different from the task previously assigned to the work crew, regardless of the time of day and/or night.

2.4.9 Management of change

The Contractor will not undertake any work outside the prior agreed boundaries (as specified in section 1.8) without obtaining permission from the Project Company.

For an alternative work site to be used, the Contractor must undertake an environmental and social review of the site and activities not already assessed in the EIA /supplementary documentation. The purpose of the review will be to demonstrate that the change does not introduce previously unanticipated significant impacts. The Contractor should include, *among other things*:

1. Description of the baseline of the affected area (including updated social or biodiversity assessments if relevant);
2. The proposed work activities and potential impacts (conduct updated assessments if required);
3. Evaluation of the significance of impacts (based on the magnitude and receptor sensitivity);
4. Confirm whether the impact can be managed using existing management plans and procedures;
5. Develop new procedures if required; and
6. Submit updated E&S review to Project Company for approval.

Where a significant impact is introduced that requires detailed assessment or cannot be mitigated using existing plans and procedures, it may be necessary to obtain a revised authorisation, which should be obtained in partnership with the Project Company.

2.5 Land acquisition

The cable will be laid entirely under an existing agricultural road and public land, with no private land acquisition required. No physical displacement will occur, and impacts are limited to temporary access restrictions to pastureland and agricultural access roads construction.

A Livelihood Restoration Plan (LRP) was developed to mitigate impacts on project affected persons (PAPs). These impacts refer mostly to the access to pastures of neighbouring animal farms – sheep and cattle.

During work at the main site and along the grid connection Right of Way (ROW), some farmers may be asked to move outside the ROW for their safety. The Project will try to avoid and minimize such disturbances to the extent possible. During all works, stakeholder engagement will be used to understand the needs and concerns of communes and other stakeholders, users of the public roads and nearby community members, including disadvantaged and vulnerable groups and make accommodations to minimize disturbances to the extent possible.

3 Management of Impacts and Mitigation Requirements

3.1 Summary of Project impacts

Summary of residual impact for all aspects is provided in Table 9 and this forms the basis for the management and mitigation requirements to follow. Detailed information can be found in the Dama PV project ESIA (2023) and the SLIP package published in 2026.

Table 9: Summary of environmental impacts (source Dama ESIA, 2023)

Topic	**Potential Impact**	**Project Phase**	**Significance (Pre-mitigation)**	**Residual Significance (Post-mitigation)**
Biodiversity	Physical destruction/ disturbance of vegetation and habitat	Construction	Minor	Minor to Negligible
	Reduced habitat connectivity	Construction/Operation/Decommissioning	Negligible	Negligible
	Vehicle collisions with Fauna	Construction/Operation/Decommissioning	Negligible	Negligible
	Hunting/ poaching	Construction/ decommissioning	Minor	Negligible
	Avifauna collisions with solar panels	Operation	Minor to Moderate	Negligible
	Barrier to species movement	Operation	Negligible	None
	Dust pollution	Construction/ decommissioning	Negligible	None
	Water and soil pollution	Construction	Minor	Negligible
	Disturbance caused by noise, light and vibrations	Construction	Minor	Negligible
	Introduction/ spread of invasive alien plants	Construction/Operation/Decommissioning	Negligible	Negligible
Climate Change	Exposure to climate events (Occurs once in 5 years to 10 years)	Operation/ decommissioning	Minor to Major	Negligible to Moderate
Groundwater and Surface water	Surface water contamination	Construction	Moderate	Negligible
		Operation	Moderate	Negligible
	Groundwater contamination	Construction	Major	Negligible
		Operation	Moderate	Negligible
	Water use	Construction	Moderate	Negligible
		Operation	Negligible	Negligible
	Hydrology and erosion changes	Operation	Moderate Major	Minor

Topic	Potential Impact	Project Phase	Significance (Pre-mitigation)	Residual Significance (Post-mitigation)
Geology and Soil	Topsoil disturbance and loss (stripping, stockpiling, reinstatement) including erosion susceptibility and compaction from construction traffic, earthworks, access roads and UGTL trenching	Construction	Major-Moderate	Minor
	Topsoil loss (Soil structure alteration (local compaction/settlement risk) at permanent infrastructure areas (substation platforms, roads, equipment pads))	Operation	Major-Moderate	Minor
	Soil contamination (from accidental spills/leaks of fuels, oils, hydraulic fluids and hazardous materials/waste)	Construction	Moderate	Negligible
	Soil contamination (from minor spills during routine O&M activities and vehicle movements)	Operation	Minor	Negligible
	Soil contamination (from spills/leaks during removal of infrastructure and temporary works)	Decommissioning	Minor	Negligible
Noise and Vibration	Noise levels to the NSRs	Construction	Minor to Moderate	Negligible to Minor
Air Quality	Construction dust emissions	Construction	Minor to Moderate	Negligable
	Construction traffic emissions		Minor	Negligable
Waste Management	Inadequate waste management	Construction	Moderate	Minor
		Operation	Minor	Negligible
		Decomissioning	Minor	Negligible

Table 10: Summary of social impacts (source Dama ESIA, 2023)

Topic	Potential Impact	Project Phase	Significance (Pre-mitigation)	Residual Significance (Post-mitigation)
Livelihood	Loss of jobs	Construction	Moderate	Minor
	Accidental damage to neighbouring plots	Construction	Moderate	Minor

Topic	Potential Impact	Project Phase	Significance (Pre-mitigation)	Residual Significance (Post-mitigation)
	Access restrictions to agricultural plots	Construction	Moderate	Minor
	Dual use of Project site	Operation	Positive	Positive
Economy, employment and income	Increase in direct employment levels	Construction	Positive	Positive
	Economic benefits of indirect and induced employment and project procurement	Construction	Positive	Positive
	Increase in local council's revenue from Project authorisation taxes	Construction	Positive	Positive
	Increase in direct employment levels	Operation	Positive	Positive
	Increase in local council's revenue from Project authorisation taxes	Operations	Positive	Positive
Education training	Increased level of education and skills	Construction/ Operation and decommissioning	Positive	Positive
Infrastructure and public services	Increased demand on public services	Construction and decommissioning	Moderate	Minor
	Pressure on housing stock through the influx of non-local workers	Construction and decommissioning	Moderate	Minor
Community health and safety	Impact on air quality and noise	Construction and decommissioning	Major	Minor
	Workforce influx	Construction and decommissioning	Moderate	Minor
Labour and working conditions	Inadequate working and/or workforce accommodation conditions	Construction and decommissioning	Major	Minor
	Health and safety of supply chain workers	Construction and decommissioning	Major	Minor
	Workers' health and safety associated with incidents during construction	Construction	Major	Minor

Topic	Potential Impact	Project Phase	Significance (Pre-mitigation)	Residual Significance (Post-mitigation)
	Workers' health and safety associated with incidents during operation	Operation	Moderate	Minor
Visual	Landscape value	Construction	Minor	Minor
	Landscape value	Decomissioning	Negligable	Negligable
	Visual	Construction	Minor	Minor
	Visual	Operational	Negligable to Minor	Negligable to Minor
	Visual	Decommissioning	Negligable	Negligable
Glare	Dwelling receptors	Operation	Minor to Moderate	Negligable to minor
	Road receptors	Operation	Moderate	Negligable to minor
Traffic	Road safety	Construction	Moderate	Minor
	Road function	Construction	Moderate	Minor
	Severance	Construction	Moderate	Minor
	Road condition	Construction	Major	Minor
	Road safety, road function, severance, road condition	Operation	Minor	Negligable
	Road safety	Decommissioning	Moderate	Minor
Human Rights	Child labour		Moderate	Minor
	Collective bargaining and freedom of association		Minor	Minor
	Modern slavery / forced labour		Moderate	Minor
	Grievance mechanism and remedy		Minor	Minor
	Job security / right to work		Moderate	Minor
	Non-discrimination		Major	Minor
	Occupational health and safety		Major	Minor
	Wages (pay equity standard of living)		Moderate	Minor
	Working hours		Moderate	Minor

Topic	Potential Impact	Project Phase	Significance (Pre-mitigation)	Residual Significance (Post-mitigation)
	Freedom of expression		Moderate	Minor
	Right to life and security of person		Major	Minor
	Social insurance		Minor	Minor
	Right to land		Moderate	Minor
	Disability rights		Moderate	Minor
	Migrants rights		Major	Minor
	Women's rights gender equality		Moderate	Minor
	Human rights in the supply chain		Major	Moderate
	Right to clean environment and access to resources		Major	Minor
Ecosystem Services	Disruption of Ecosystem Services	Construction, operation and decommissioning	Moderate	Minor

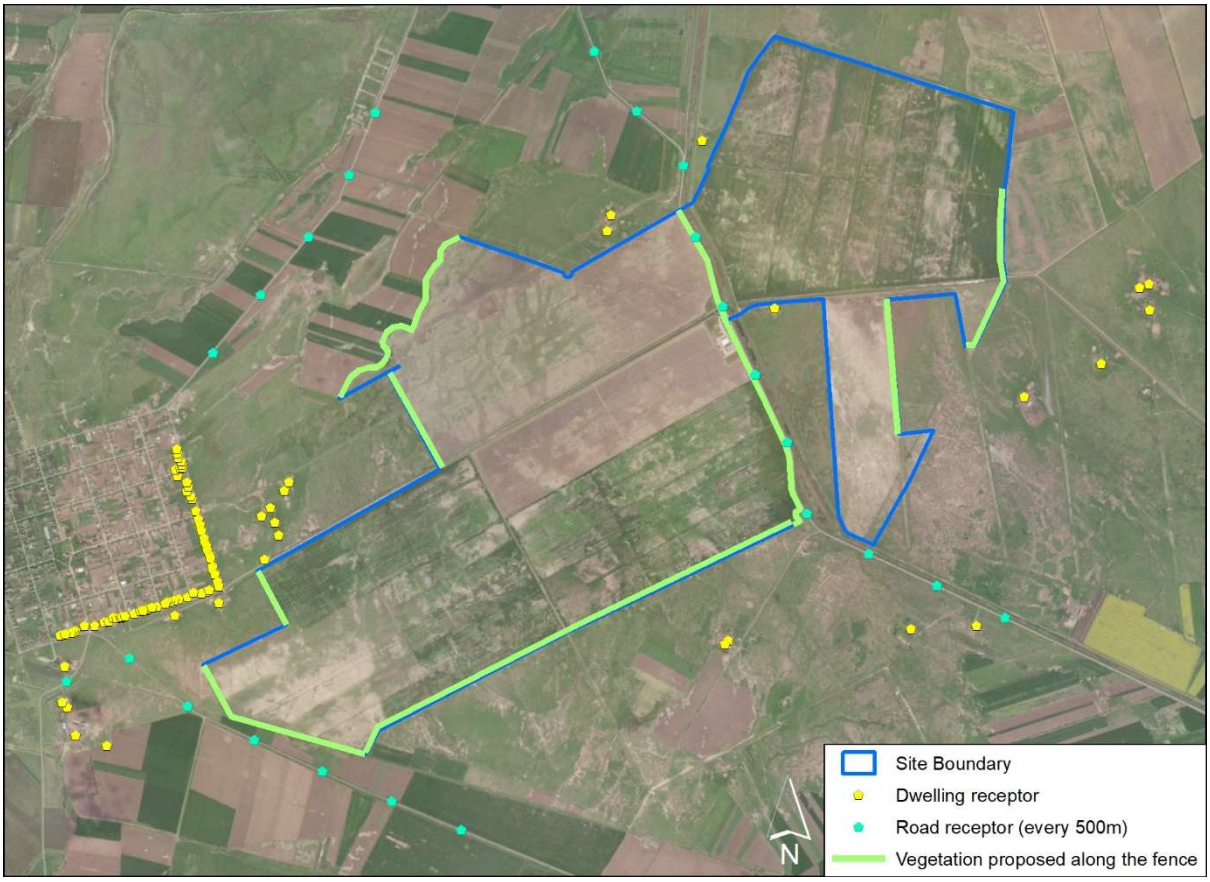
3.2 Project design requirements

The Contractor will develop detailed design drawings, "**Contractor Design Drawings",** outlining how the Project design has addressed the following E&S obligations relevant to the Project.

- PV modules will be equipped with anti-reflection coating to minimize the reflection rate
- Maximize the separation distances between panels to reduce the proportion of an observer's field of view that is affected by glare;
- For dwellings with windows facing the reflecting area adopt measures that restrict potential views of a reflecting area reduce the level of impact;
- Screen solar reflection between the PV site and the roads where a direct reflection is observed.

The proposed vegetation screening (green area) is shown in Figure 13 below.

Figure 13: Glare mitigation design requirements (vegetation screening)



3.3 Topic-specific requirements

Table 11 provides a complete list of E&S topics covered by this CESMP describing the minimum requirements around specific impacts identified in the Project ESIA.

The Contractor will review these requirements and prepare **Contractor Management Plans/Procedures** setting out how they will comply with or exceed the minimum requirement defined and describe how this will be done.

Table 11: Project-specific topics

Topic to be addressed	Requirements reference
Accommodation	Section 3.4
Subcontractors and suppliers management plan	Section 3.5
Emergency Preparedness and Response (EPR)	Section 3.6
Occupational Health and Safety (OHS)	Section 3.7
Site clearance and topsoil management Plan	Section 3.8
Environmental Pollution Prevention and Control (PPC) (covering management of construction noise, dust, hazardous materials, effluent wastewater and water use)	Section 3.9
Community Health and Safety (CHS) Plan	Section 3.10
Traffic and Transportation Plam	Section 3.11
Waste (general and hazardous) Management Plan	Section 3.12
Labour and Working Conditions and Employment Plan	Section 3.13
Cultural heritage and Chance Finds	Section 3.14
Security (site and community) Management Plan	Section 3.15

Other plans relevant to the Project that will be owned by the Project company, but must be followed by the Contractor where relevant are listed in Table 12

Table 12: Project Company Management Plans

Plan	Requirements
Stakeholder Engagement Plan	Section 3.14
Biodiversity Management	Refer to the Biodiversity Management Plan

3.4 Accommodation

The Project intends to accommodate non-local workers in existing residential units within nearby communes.

The agreed strategy is to lease existing residential units, which will be managed by the Contractor under formal rental agreements and in compliance with Project environmental and social standards, as well as applicable national legislation and international good practice (IFC / EBRD Workers' accommodation: Process and Standards (August 2009).

Before any worker accommodation facility is selected or contracted, the proposed option will be reviewed and subject to prior approval by the Environmental and Social (E&S) Manager to ensure compliance with applicable project standards and requirements.

All accommodation must meet defined minimum standards. Occupancy density will be controlled to avoid overcrowding, with a maximum of two workers per bedroom and typically no more than four to six workers per apartment, depending on size. Each worker will be provided with a separate bed and adequate storage space, and minimum space requirements per person will be respected. Sanitary facilities must be sufficient for the number of occupants, with reliable access to potable water, electricity, heating, and waste collection services. Accommodation units must comply with Romanian building and fire safety standards, including appropriate ventilation, natural lighting, secure access, and the availability of basic fire protection equipment. Kitchen facilities must be functional and hygienic, and regular cleaning and maintenance procedures will be implemented.

Workers will be required to adhere to a Code of Conduct governing behaviour within the community, including expectations related to noise, alcohol consumption, and respectful interaction with residents. The Project grievance mechanism will remain accessible to both workers and community members in case of concerns related to accommodation or conduct.

Transportation between accommodation locations and the construction site will be organized by the Contractor through dedicated shuttle services aligned with shift schedules. Travel time will be managed to ensure reasonable commuting durations, and vehicles will comply with applicable road safety and insurance requirements. Routes and schedules will be coordinated with local authorities to minimize disturbance and avoid inappropriate use of agricultural roads.

The Contractor's HSE and E&S Managers will inspect accommodation prior to occupancy and conduct periodic monitoring throughout the construction phase. Usage of the proposed accommodation will be subject to approval from ESG manager. Records of occupancy levels and inspection findings will be maintained, and any identified non-compliance will be addressed

promptly. The Project Company will retain oversight and may conduct independent verification as necessary.

3.5 Contractor and Sub-Contractor management

3.5.1 Project Company

The Project Company will require that the main Contractor and all sub-contractors engaged in the Project operate in a manner consistent with the requirements of this CESMP. The Contractor will effectively manage all sub-contractors as follows:

- Assessing the environmental and social risks and impacts associated with such contracts.
- Ascertaining that contractors engaged in the project are legitimate and reliable enterprises with knowledge and skills to perform their project tasks according to their contractual commitments.
- Incorporating all relevant aspects of the ESMP into tender documents and vendor contracts.
- Contractually requiring contractors and vendors to apply the relevant aspects of the ESMP and management tools, including appropriate and effective non-compliance remedies.
- Monitoring contractor compliance with their contractual commitments; and
- In the case of subcontracting, contractors have to have equivalent arrangements with their subcontractors.

The Contractor will develop Project E&S "schedule of requirements" for use when contracting with all third-party Tier 2 Subcontractors. The E&S schedule will set out Project requirements against the following subheadings with explicit reference to the requirement of the IFC PSs/EBRD ESRs and relevant GIIP. The topics to be elaborated in the E&S schedule are:

- General ESHS management,
- ESHS staffing,
- Requirements for assessing E&S risks,
- ESHS training,
- Hazardous materials, waste management, biodiversity management, occupational health and safety,
- emergency response, security,
- Labour welfare aligned with IFC PS2EBRD ESR 2,
- ESHS inspections and auditing,
- ESHS reporting, including labour reporting (inc. Incident reporting, community relations, local hiring, code of conduct,
- Environmental, Health, and Safety Non-Conformities and Penalties,
- Documentation and compliance records.

3.5.2 Contractor

The Contractor will develop a **Subcontractors and Suppliers Management Plan** setting out how it will audit third-party sub-contractors and suppliers prior to contracting to verify their eligibility to meet the E&S obligations as set out in this document. This shall include:

- Willingness to adhere to environmental, social, health and safety and labour policies of this CEMSP;
- Documentation to evidence practices that align with Lender requirements, including their entitlement to wages and benefits, hours of work, overtime arrangements and overtime compensation, and leave for illness, maternity, vacation or holiday, that at a minimum comply with national law. This includes respecting a collective bargaining agreement with a workers' organisation if there is such an agreement to working conditions, terms of employment (worker contracts);
- Confirm no serious EHS incidents or fatalities in the last five years; and
- Willingness to provide appropriate personal protective equipment (PPE) in conjunction with training, use and maintenance of the PPE. PPE provides additional protection to workers exposed to workplace hazards in conjunction with other facility controls and safety systems and the ability to implement OHS procedures in line with this ESMP.

3.6 Emergency Preparedness and Response

3.6.1 Contractor responsibilities

The Contractor will define (as a minimum) emergency response procedure (s) for each scenario listed below, following the generic outline in Table 13. The following are the responsibilities of the Contractor:

- Develop Contactor EPRP.
- Define all roles and responsibilities within an EPRP;
- Establish a Project Emergency Response Team (ERT);
- Ensure emergency resources are maintained at adequate levels in step with the progress of the project;
- Coordinate all employees and activities during an incident;
- Test the procedure using mock drills and (joint) exercises;
- Train employees on EPRP requirements; and
- Contact relevant emergency response agencies to assess their capacity to define EPRP requirements.

3.6.2 EPRP requirements

The following potential emergency scenarios relating to the construction phase works have been identified:

- Severe weather events (wind, rain, severe cold, ice conditions);
- Medical emergency (e.g., an accident resulting from material handling, rigging, hoisting, excavations, failure of temporary structures, chemical or hazardous material contact);
- Worker evacuation (e.g., from height, confined space, excavation);

- Explosion/fire emergency plan (bushfire);
- Hazardous material or spill release plan (e.g., from on-site materials, chemicals and solutions);
- Transportation accidents (e.g., during the delivery of normal and abnormal loads) in the local community and on-site;
- Electrical accident (e.g., working with live equipment for the construction of a substation, overhead line);
- Criminal activity (terrorism, robbery, hostage incident, bomb threat, suspicious package, workplace violence); and
- Demonstration / civil disturbance.

Table 13 sets out the general requirements for managing responses to these hazards/scenarios that must be addressed in the Contractor EPR Plan (EPRP)

Table 13: General requirements for EPRP

Requirement	Summary of requirements
Define Performance Objectives	The Contractor should set objectives for all aspects of the EPRP. Include hazard prevention/deterrence, risk mitigation, emergency response and business continuity.
Hazard identification/assessment	The Contractor should undertake a thorough hazard identification and assessment process involving a thorough review of aspects of the project where hazardous conditions could arise. The process of hazard assessment must be ongoing to accommodate the dynamic environment of the construction site progress. Once hazards are identified, the potential risks involved in each must be evaluated. The following aspects of each hazard identified must be considered in the plan: • Elements or circumstances that can go wrong • The anticipated consequences of any circumstance that may go wrong • For each potential hazard, the resources necessary for an appropriate emergency response must be assessed (e.g., evacuation, sheltering, incident stabilization.
Assess the availability and capabilities of emergency resources (internal and external)	The Contractor will provide suitable and sufficient emergency equipment and facilities on-site. An assessment will be conducted to determine the type, number and location of emergency equipment and facilities required for the project site. The required equipment may be phased in as the construction operations increase. The required equipment must, however, be available for use at the start of the construction and at the

Requirement	Summary of requirements
	beginning of each change in construction activity that requires additional emergency equipment. On-site emergency response resources such as fire extinguishers, spill containment equipment, and first aid kits must be maintained and identified. Construction equipment may be included among potential emergency resources. Workers will not be left without a vehicle at any Workfront for any length of time.
Roles and responsibilities (internal and external)	The Contractor must develop a site-based resourcing plan that identifies suitably qualified, experienced personnel and suitable equipment and materials along with contingency plans must be compiled. Personnel, especially on-site medical staff or workers trained in first aid, should be defined in the EPRP. There may be situations where outside emergency resources are so far away that an adequate response is impossible. In these situations, the Contractor must consider that these resources may have to be available on-site, especially for fire protection and advanced life support procedures. In this case, including a specific casualty evacuation plan developed in consultation with the local government authorities is essential.
Medical services plan	The Contractor will develop a medical service plan with the following minimum content: • The requirements for medical services for subcontractors; • The arrangements with outside medical services and the training of workers regarding the procedures, the use of first aid kits and escort of injured persons to specified medical clinics; • A procedure for each type of medical service, for provision of the service (who, what, when, where), and provide the name, address, and contact information for the medical facility or facilities to be utilized; • Describe the provision for medical emergency services, including but not limited to the following; • Location of first aid supplies;

Requirement	Summary of requirements
	• Identification of first aid and CPR-trained personnel; and • Location of on-site and off-site emergency medical facilities, contact information, directions, and protocols.
Liaison with outside providers	To cater for potential emergency escalation requirements the local emergency services and response providers must be engaged as part of the EPRP to ensure these services are available and able to respond suitably when required. Consideration must be given to the following reaction capabilities in finalizing the resource requirements of the EPRP: • Facility strengths or limitations available in that location; • Availability of high-reach rescue team; • Services mobilization response time; • Estimated travel time to reach the site and • Interim basic life support procedures during emergency services reaction time.
Communication (internal and external)	• A communications system that can relay accurate information quickly is critical to effective emergency response. Reliable communications equipment must be available, procedures developed, and personnel trained to use these systems correctly during emergencies. The Contractor should consider a backup system for cases where the system is rendered useless by the emergency. The type and location of emergency communication systems must be posted on the site safety announcement board. This will include, amongst others: • Location of telephones; • List of site personnel with cellular phones or two-way radios or any other equipment available; • Emergency phone numbers and the Workfront location (mile number) should be posted beside all Workfront phones and • The EPRP plan shall be posted in a conspicuous place on the project site and must identify the designated equipment and the people to operate it.
Assembly points	In conjunction with the Project Company, the Contractor shall identify and designate assembly points for all areas/ teams. This will be marked on the ROW maps and displayed in visible places such as noticeboards at the Workfront.

Requirement	Summary of requirements
	Assembly Point Wardens shall be appointed to manage and be responsible for the Workfront. Registers of staff and visitors present on site each day shall be available at the Workfront during assembly to verify that all on-site people are accounted for.

3.6.3 Emergency response team

The Contractor shall establish an Emergency Response Team (ERT) to respond to fire-fighting and other emergencies. The objective of the ERT is to prevent an incident from escalating into a major disaster by controlling an identified emergency and executing the EPRP efficiently and effectively.

The ERT team should comprise the following personnel[13] as a minimum and identify their name, location, work telephone and home/ cell telephone:

- ERT Coordinator;
- Sub-contractor (s) emergency coordinator (one for each sub-contractor);
- ERT team leads (as necessary);
- First Aiders;
- Security team;
- Project Fire Fighters; and
- Assembly Point Wardens.

3.6.3.1 External support

The Contractor should identify the names and contact details for local emergency services, including centralised services in the communes or further afield e.g. Arad

- Voluntary Emergency Situation Service (SVSU) on each commune (including doctor);
- Fire Service
- Emergency medical services;
- Police department;
- Hospital; and
- Utility company (overhead line).

The Contractor must undertake an assessment of the capacity of these resources to respond to Project emergencies and incidents so as to confirm their suitability to support without being overwhelmed. Where the capacity of the existing services is not suitable, the Contractor must identify means to supplement existing services with dedicated Project emergency resources.

[13] For each of these roles, the Contactor may wish to assign roles to sub-contractors depending on the role the sub-contractor has on site and the number of personnel.

3.6.3.2 Emergency equipment

The contractor will provide the following equipment in sufficient numbers to cover the whole site:

- Spill response kit (s)
- Fire extinguisher (s)
- Other according to national provisions specific for the project

3.6.3.3 Competence and training (emergency response)

The Contractor shall ensure that all personnel receive specific induction training on the EPRP and specific EPRP training. For personnel nominated as part of the ERT, the Contractor will provide specific training to those individuals on their roles and responsibilities under the EPRP and outline this in their training plan.

The Contractor EPRP shall describe the training and awareness requirements necessary for its effective implementation. Contractor's training activity associated with the Contractor's procedures shall be appropriately documented using a training needs assessment, training matrix/plan and records of training undertaken.

3.6.3.4 Emergency Drills

The Contractor must conduct monthly emergency drills (reflecting different scenarios) to assess the effectiveness of the EPRP and response times. The different types of drills to be considered include:

- Tabletop exercises, practising the ERT procedures without mobilisation of resources and in slow time. Evaluating performance, identifying areas for development and establishing further training needs;
- Simulated exercises for all reasonably expected scenarios, practising the combined response, mobilising resources in real-time, evaluating performance, identifying areas for development and establishing further planning needs; and
- Major exercises were conducted to demonstrate all aspects of emergency response and support for the organisation. This exercise would involve all internal and external teams and be restricted to significant risk scenarios (e.g., evacuation from height).

A schedule of emergency drills and scenarios will be developed by the Contractor and submitted to the Project Company for approval as part of the Contractor EPRP. Following each drill, a report will be prepared, identifying areas of improvement and actions to be implemented. Actions will be tracked within the Corrective Action Plan (CAP). Records of the drills and lessons learned shall be retained.

3.6.3.5 Communication

The Contractor EPRP must be communicated to all site personnel regularly in addition to the site induction training, and the EPRP must continually undergo review and revision to meet changing

conditions. The following activities should be considered in defining review and communication requirements:

- Introduction of new subcontractor and new worker activities at site;
- New supplier storage and handling requirements to ensure any hazards that the storage or delivery of their materials may create;
- Introduction of new work areas and new hazards;
- Outcomes of health and safety meetings concerning new hazards or significant changes in site conditions that require additional focus or attention; and
- Stakeholder inputs to the Emergency Response Procedure.

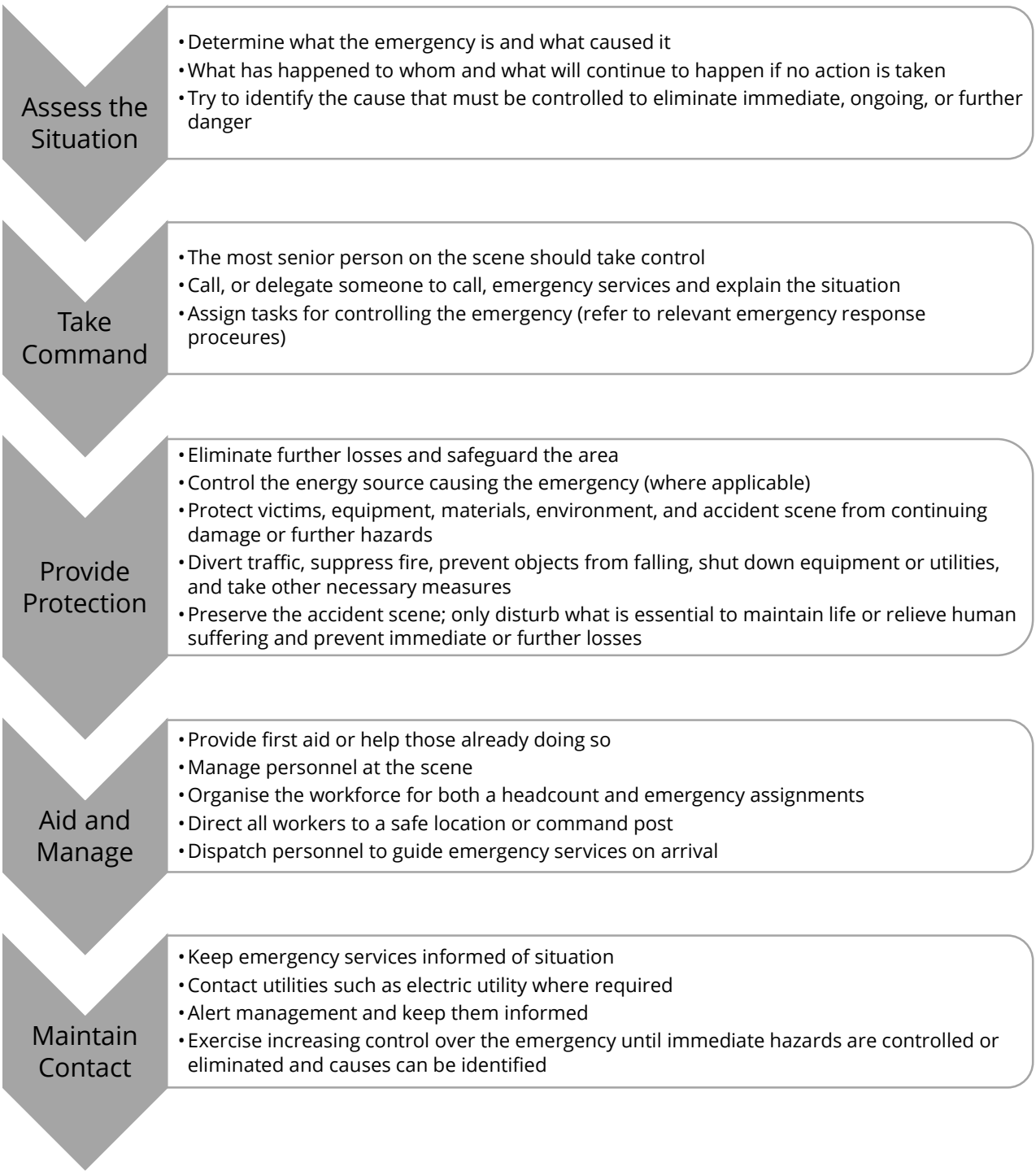
The Contractor must clearly define any on-site systems to warn employees to act.

3.6.3.6 Community interface

The Project Company's community liaison officer (CLO) will work with the Contractor to identify and disseminate information on potential emergency scenarios that may affect local communities. Specifically, the CLO will liaise with the local community on the following topics:

- Potential emergency scenarios that may impact the local community (e.g., traffic movements, blasting activities);
- Emergency contact information in the event of an emergency; and
- Local capacity for emergency response resources (firefighting, medical, paramedic etc.).

Figure 14: Emergency response procedure – generic



3.7 Occupational health and safety (OHS)

3.7.1 Project Company responsibilities

The Project Company will be responsible for the following general responsibilities:

- Ultimate responsibility for health and safety at the site;
- Communicating the requirements of H&S and security policy and the contents of this ESMP to the Contractor;
- Appoint E&S specialist to oversee E&S implementation on behalf of Project Company, Project Company and EBRD/IFC;
- Oversee the activities of the Contractor for OHS management emergency preparedness;
- Review health and safety, security and environmental programs and monitor close out of actions in the Project Corrective Action Plan (CAP);
- Review Contractor reporting regularly;
- Ensure that all contractors adhere to the EHS policy, local regulations and ESMP and Lender action plans;
- Monitor implementation of contractor ESMS and HSMS and advise Contractor (s) to drive the implementation of national and Lender standards and procedures at the site;
- Review and approve contractor procedures and method statements before work commences, including correct certifications relevant to the work activity planned;
- Collate, report and submit all EHS monthly compliance audits, monthly incident statistic reports and monthly lender reporting, any other required documented records and report findings on behalf of the Project Company;
- Conduct H&S inspections and audits on behalf of the Project Company and ensure corrective actions are monitored and documented as required by this CESMP (including worker audits);
- Confirm that all site personnel and employees are informed of site safe working procedures and practices so that they can fulfil their responsibilities;
- Oversee implementation of the Contractor H&S plan, training records, matrix, and HR policies;
- Verify contractor provisions for medical preparedness and facilities are readily available for all employees and that records are adequately maintained and the adequacy of contractor Emergency Preparedness, ensuring appropriate training mock drills and ensure contingency plans are current;
- Oversee Contractor investigation of incidents or near-miss events as necessary or required, including compilation and completion of any necessary documentation (e.g., Accident investigation or Near miss forms);
- Ensure efficient HS communication via HS Committee Meetings, attendance and sharing of information from HSE meetings;
- Provide out-of-hours emergency contact service;
- Ensure efficient HSE communication via HSE Committee Meetings, attendance and sharing information from HSE meetings; and
- Provide out-of-hours emergency contact service.

3.7.2 Contractor responsibilities

The Contractor will be responsible for the following responsibilities:

- Develop and present its own **Occupational Health and Safety Management (OHS) Plan,** which shall meet the minimum requirements of this CESMP;
- The OHS Plan will include:
    - Project safety principles and philosophy
    - H&S policies and commitments
    - Project H&S objectives
    - Project H&S challenges
    - Project H&S management system structure
    - H&S leadership, organization, competence, communication
    - H&S contractors management
    - PPE requirements and enforcement
    - Incident reporting, investigation, and monitoring of non-conformances
    - Risk profiling and emergency preparedness and response planning
    - H&S audit & review
    - H&S performance monitoring / improvement
    - Management of change
- Present their H&S Plan to the Project Company at least 60 days before site mobilisation for review and acceptance by the Project Company
- Appoint needed on-site, full-time H&S professional and additional health and safety professionals according to national legal provisions;
- Appoint appropriate sub-contractors considering their safety culture;
- Before the commencement of works at any job site, submit to the Project Company a job hazard analysis (JHA) / risk assessment (including H&S requirements) that includes consideration of all workers (including sub-contractors); this will include the scope of work, known and potential hazards, and corrective measures and controls that shall be implemented to abate these hazards;
- Provide enough resources for implementation of health and safety controls measures (H&S equipment, personal protective equipment (PPE);
- Ensure effective communication of safety information to the relevant personnel, including between contractors and phases of a project (including supplementary training where required);
- Provide enough first aid and emergency rescue services on-site and
- Define casualty evacuation procedure, hospital arrangements, and distance/time to reach the nearest advanced life support facility.

3.7.3 Activities to be performed for the Work

The key activities and risks identified in connection with the works are:

- Transportation risks, accidents involving property along the transportation route, shifting loads, collision with other vehicles, impacts due to road restrictions, fatigue (excessive driving);
- Mechanical hazards, e.g., contact with moving parts;
- Electrical hazards, e.g., short circulates, overcharge, electrostatic phenomena or falls due to shock;
- Organisational effects, e.g., time pressure, lack of suitable safety equipment, lack of skills;
- Exposure to noise or vibration; and
- Exposure to adverse weather conditions.

For each activity, the specific risks will be identified through:

- Job hazard analysis (JHA) / risk assessment;
- Review of OHS policies and objectives; and
- Legal requirement and GIIP.

The Contractor is required to put in place procedures for implementing the following control measures as a minimum:

- Engineering controls;
- Specific operating procedures (e.g. electrical switching, working at heights, chemical product handling, working in confined spaces, excavation works, earthmoving, concreting, work in an explosive atmosphere, hot work, working with scaffolding, working with cranes and load lifting, hand and power tools, working with machinery, electrical safety, noise prevention, blasting, substation building works, laying high voltage lines, material transport (unloading and storage), wind turbine assembly, WTG electrical installation, commissioning);
- Hazard risk identification and risk control (e.g., JHA);
- Permit to work system / lock out tag out system (LOTO);
- Personal protective equipment (PPE) and Employees health monitoring program;
- Periodic site inspections;
- Emergency preparedness and response (including firefighting management);
- Incident and accident reporting and investigation;
- Legal and other requirements;
- Site induction and training;
- Management of change; and
- Sub-contractor management.

Further minimum requirements for occupational health and safety management to be included in the Contractors Health and Safety Management Plan are defined in Table 14 below.

Table 14: Minimum requirements - occupational health and safety

Reference	Activity	Project Commitment	Responsibility	Timing	KPI
OHS-1	General site management.	• A specific site laydown area shall be defined on a site map. • Dedicated site roads shall be earmarked for the movement of vehicles around the site. • Hold safety briefings with the employed labour force to ensure greater attention to detail and safety, especially when performing work activities in dangerous environments, i.e., working with electrical equipment or driving inside and outside the project site	Contractor.	Prior to works commencing on site.	Site map showing laydown area Traffic management plan
OHS-2	Site Access.	• Contractor shall develop a procedure to control of access control on site and delivers the access authorisation to any Visitor or Worker.	Contractor	Prior to works commencing on site.	Site access procedure
OHS-3	Induction training and competence assessment.	• Contractor shall put in place comprehensive site safety induction training shall be mandatory. • The safety induction shall include a competence assessment; • The safety induction will be updated to reflect changing nature of work on site on a regular basis; and • A simplified induction is allowable for visitors or site staff who will not enter the working area or who will be accompanied at all times. The language of all training must reflect the workers on site.	Contractor	Prior to works commencing on site.	Site induction
OHS-4	Personal protective equipment (PPE).	• Provide workers with protective personnel equipment (PPE), appropriate to the specific activities, to prevent occupational health issue and reduce the number of accidents at work.	Contractor	Prior to works commencing on site.	PPE procedure

Reference	Activity	Project Commitment	Responsibility	Timing	KPI
		• Minimum mandatory PPE equipment must include safety shoes, hi-vis vest, hard hat and safety glasses; • A physical limit clearly identified with signs will show the limit of the area where wearing standard PPE is mandatory; • Colour coded hard hats should be employed to identify key personnel (e.g., first aid workers); and • In construction work areas, in addition to standard PPE, workers shall wear safety equipment as defined in the job Hazard analysis performed prior start of work.			
OHS-5	Safety signage.	• A system of safety signage will be employed at each Workfront and communicated to all workers; and • Areas of work activity e.g., Lifting /excavations must be marked off and appropriately signed.	Contractor	Prior to works commencing on site.	HSE inspections (safety signage)
OHS-6	First aid.	• At each Workfront there shall be at least one person trained in Lifesaving / First Aid who could attend to primary care of an accident victim; • The Workfront will be equipped with a first aid kit. • All workers are required to notify line managers of any allergens; and • The first aid kit shall undergo a monthly revision, and products shall be replaced as soon as they have been used. • Provide regular training on first aid and safety responses in order to limit accidents' impact on workers' health	Contractor	Prior to works commencing on site.	HSE inspections (emergency provisions)

Reference	Activity	Project Commitment	Responsibility	Timing	KPI
OHS-7	Permits to work.	• Work permit, hot work permit, work at height permit and rigging permit systems shall be deployed in the H&S Management plan. A specific plan shall be developed for the commissioning period or for working with live equipment.	Contractor	Prior to works commencing on site.	All works covered by relevant PTW
OHS-8	Machinery and tools.	• All machines, tools, auxiliary accessories, equipment and devices to be used on site shall have their manuals, technical standards and specifications; • A copy of this technical information, comprising operation, use, maintenance and upkeep instructions and procedures, shall be kept by the Contractor; and • Machines and tools can only be used by authorised workers, on basis to their training and/or experience.	Contractor	Prior to works commencing on site'	Pre-works tools inspection Tools inspections records Colour code on site followed.
OHS-9	Electrical hazards.	• Whenever identified, overhead power lines that could affect the safety of the works shall be subject to barriers and warnings in accordance with standard safety requirements.	Contractor	Prior to works commencing on site	HSE inspections (overhead line safety)
OHS-10	Material handling.	• Prior to handling any chemical product, the operator must always consult the manufacturer's Safety Data Sheet and adhere to all the instructions therein; • Sufficient flat ground will be available for storing materials to be used; and • Materials, tools, hoisting equipment etc., shall be stored and protected from the effects of inclement weather.	Contractor	Prior to works commencing on site.	MSDS for all products on site

Reference	Activity	Project Commitment	Responsibility	Timing	KPI
OHS-11	Lone working.	• Contractor shall ensure the practice of employees working in the construction area or at remote locations on their own is permitted subject to the specific safety mitigation provisions which shall be defined in the Contractors Health and Safety Management Plan.	Contractor	Prior to works commencing on site.	Weekly HSE inspections (lone working)
OHS-12	Road traffic accidents.	• Contractor shall develop and Traffic Management Plan.	Contractor	Prior to works commencing on site.	
OHS-13	Worker welfare.	• Contractors / subcontractors carrying out work on site shall install at least a single building for their own use, equipped with bathrooms, changing rooms and premises for eating; • Contractor shall provide drinking water to its staff via running water taps or containers, in sufficient quantity, and in hygienic conditions; • Contractor will supply sufficient drinking water in proportion to the number of workers. It is prohibited to provide water for drinking through barrels, containers, buckets or other open containers; and • Contractor will provide toilets equipped with running water that must be connected to a controlled means of sewage control.	Contractor	Prior to works commencing on site.	HSE inspection (Welfare provisions on site i.e. water, shade, toilets) -
OHS-14	Coordinating wind farm activities.	• Contractor will put in place procedure for coordinating activities of all sub-contractors on site.	Contractor	Prior to works commencing on site.	

3.8 Site clearance, topsoil management and rehabilitation

The Contractor will prepare a procedure for vegetation clearance and topsoil management prior to works commencing. Specific requirements of the Plan as identified in the ESIA are summarised in Table 15 below. Further information on the biodiversity aspects can be found in the Project Biodiversity Management Plan.

Table 15: Minimum requirements - Vegetation Clearance and Soil management.

Reference	Activity	Project commitment	Responsibility	Timing	KPI
VC-1	Site clearance	• Develop a Topsoil Management and Site Reinstatement Plan including clear guidelines for construction activities to prevent unnecessary disturbance to topsoil • Land clearance should be sequential and where ground and earthworks are undertaken the smallest possible area for working will be exposed	Contractor	60 days before Site mobilization	Plan (reviewed and accepted by the Project Company)
VC-2	Topsoil management	• Stripping of topsoil will not be conducted earlier than required (maintain vegetation cover for as long as possible) in order to prevent the erosion (wind and water) of organic matter, clay and silt. • Use proper machinery and equipment with low ground pressure to minimize compaction and disturbance to the soil structure. • Store topsoil in designated areas and use it for site restoration after construction is completed	Contractor	Construction	Clearance method statement Map of topsoil storage area
VC-3	Stockpile management	• Coordinate stockpile management in the ROW	Contractor	Construction	Stockpile management map

Reference	Activity	Project commitment	Responsibility	Timing	KPI
		• Ensure that materials stockpiles are placed in a safe and secure area within the Site or along the ROW. • Stockpiles stored longer than six weeks should be vegetated to reduce soil loss from wind or storm water runoff; • Stockpiles will be located as far away from receptors as possible.			
VC-4	Fauna management during clearance	• Employ an ecological officer to be present on-site during excavation to assure compliance with construction phase mitigation measures and conduct daily searches of Work fronts and animal rescue from open trenches. • Consult with protected areas management authority to ensure activities within designated protected areas (Natura 2000 sites) are permitted by the relevant protected areas management authority	Contractor	Construction	Stockpile management map
VC-5	Rehabilitation	• Develop a re-vegetation and restoration plan • Ensure 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	Contractor	Construction	Re-vegetation and restoration plan Monitor of disturbed areas (at least monthly)

Reference	Activity	Project commitment	Responsibility	Timing	KPI
		• Apply soil amendments or organic matter to enhance soil fertility and promote vegetation establishment			
VC-6	Soil Contamination	• Establish vegetative cover, such as grass or leguminous cover crops, to protect the soil from wind and water erosion. • Maintain the existing topsoil by sowing it with grass. • Contract a licensed contractor to collect, transport and treat domestic, construction and hazardous wastes from Project sites. • Prohibit landfilling any types of solid waste to the soil, or burning of waste. • 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 (see section 3.9 below). • Restrict execution of maintenance works to specifically-designated platforms/locations provided with strict control of accidental spills. • Provide spill kits at all work locations. • Develop and implement procedures for responding to emergencies / accidental spills of	Contractor	Construction	Monitor of disturbed areas (at least monthly) Waste Management Licences for all relevant waste contractors. Weekly HSE inspections Hazardous materials inventory (storage suitability). Spill equipment located next to all hazmat storage areas.

Reference	Activity	Project commitment	Responsibility	Timing	KPI
		hazardous materials, fuel and handling, and waste management. • In case of accidental spillage, the contaminated soil should be immediately collected and stored as hazardous waste.			

3.9 Environmental Pollution Prevention and Control and Water Resource Use

The Contractor will prepare plans and procedures for implementing the requirements outlined in Table 16, including a specific "**Hazardous Materials Management Plan"**

Table 16: Minimum requirements – pollution prevention and control

Reference	Activity	Project commitment	Responsibility	Timing	KPI
EPPC-1	Hazardous material management	• Hazardous materials must be stored on-site (laydown area and at the Workfront) in a secure storage unit applicable to the material with the appropriate ventilation, labelling, segregation, bunding, emergency response equipment, and PPE. • All material safety data sheets will be retained on-site and, where appropriate, risk assessments performed. • Checking our material for the hazardous material store will be coordinated and controlled by a nominated person trained in the handling and safety requirements of hazardous materials. • The correct PPE must be provided for all workers working with hazardous materials.	Contractor	Construction	Hazardous Materials Log MSDS (for all materials) Hazardous materials storage plan (laydown and Workfront)

Reference	Activity	Project commitment	Responsibility	Timing	KPI
		• All hazardous materials mut be removed from the site at the end of the works.			
EPPC-2	Removal of materials and works may generate dust	The Contractor must define a **Dust Control Procedure** including measures to: • All transported bulk materials must be covered with tarpaulins to prevent fugitive dust emissions; • Any air quality related grievances received from neighbours must be reported to the HSE Officer or to the CLO, through the established Community Grievance Mechanism; • Grievance mechanism to be implemented for operation and decommissioning phase. • Access road is to be wetted, especially during the dry season, and when construction activities are in progress, and especially in those areas in close proximity to residential homesteads (< 200 m). • In the case of pneumatic drilling during excavation, dust shall be suppressed by ongoing water spraying and/or installing dust screen enclosures at the site. • Prohibit open burning construction/waste material at the site • Prohibit the idling of construction vehicles while unloading materials at the site. • Conduct water spraying to suppress dust and minimize discomfort to nearby residents and occupants in the compound. • Keep a stockpile of aggregate and sand materials covered with well-fixed plastic sheeting, tarps or other geotextiles to avoid	Contractor	Construction	Dust control procedure Inspection records Grievance Log

Reference	Activity	Project commitment	Responsibility	Timing	KPI
		suspension or dispersal of fine soil particles during dry and windy days. • Equip concrete mixing equipment with dust shrouds. • Periodically clean up debris.			
EPPC-3	Noise and vibration generating activity may impact nearby noise resistive receptors.	The Contractor must define a **Noise Control Procedure** including measures to: • Ensure noise during construction will be limited to restricted times agreed to in the permit • Ensure engine covers of generators, air compressors and other powered mechanical equipment shall be closed, and equipment placed as far away from residential areas as possible • Deliver prefabricated tower sections to the desired size to minimize cutting activities onsite. • Restrict general hours of working to avoid sensitive periods (e.g., night-time & evenings between 7 pm and 7 am) if there are sensitive receptors • Position plant items as far as possible from sensitive receptors • Use quietest work methods and plant items where practicable • Monitor noise grievances through the Project grievance mechanism (refer to section 3.16)	Contractor	Construction	Noise control procedure Inspection records Grievance Log
EPPC-4	Water resource use	• Develop a site **Water Resource Management Plan.** • The Contractor will ensure the water supply options do not impact on competing water users and biodiversity.	Contractor	Pre-construction / construction	Water Resource Management plan.

Reference	Activity	Project commitment	Responsibility	Timing	KPI
		• The Contractor is responsible for delivering water to site (work and potable) via any means other than groundwater abstraction. • Should groundwater abstraction be required, prior approval should be obtained from the Employer.			
EPPC-5	Visual impact	• 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; • Minimize night lighting while guaranteeing the minimum safety level; • Use of materials that will minimize light reflection should be used for all Project components; and • Existing vegetation should be retained to the greatest extent possible. Vegetation should be retained along roads, and other Project infrastructure	Contractor	Pre-construction / construction	Community Grievance Log Site Inspections

3.10 Community Health and Safety

The Contractor will integrate into all method statements and risk assessments actions for implementing the requirements outlined in Table 17

Table 17: Minimum requirements - community health and safety

Reference	Activity	Project commitment	Responsibility	Timing	KPI
CHS-01	The Activity around the site and cable works may pose an H&S risk to persons using the facility and passers-by.	• Develop OHS Management Plan • Plan activities to minimise or avoid impacts on communities. • Minimize interaction between road users and construction workers.	Contractor	Pre-construction / construction	OHS Management Plan
CHS-02	Workers may pose a GBVH risk to community members	• As part of the induction training, conduct awareness training for all workers on gender awareness, sexual harassment and gender-based violence among contractors, project workers, and students (define and implement a worker's code of conduct) • Require all worker to sign a GBVH code of conduct • Include GBVH related disciplinary actions in worker contracts and HR policies to mitigate the risks of Contactors working close to vulnerable persons.	Contractor	Pre-construction / construction	Induction training All workers inducted before commencing work. All workers sign GBVH Code of Conduct
CHS-03	Delivery of materials and equipment to the site leads to increased community health and	• Obtain all national permits relevant to traffic and transportation before the start of works and ensure proper coordination with the national road agency	Contractor	Pre-construction / construction	Traffic Safety and Management Procedure (see

Reference	Activity	Project commitment	Responsibility	Timing	KPI
	safety risk from increased traffic volumes and other congestion and nuisances.	• Develop a Project specific Traffic Management Plan. The TSMP (including a site map) will be reviewed and approved by the Project Company. The TMP must make provision for the following actions: • Comply with all statutory vehicle limits (width, height, loading, gross weight) following National Road Traffic Regulations and any other statutory requirement on vehicle maintenance. • Identify specific routes for delivery vehicles to approach and leave the Workfront. • Arrange a PV and OHTL site layout to ensure there are measures and controls for the safe movement of vehicles to protect workers and the public, on public roads (e.g., pre-agreed delivery times (staged), demarcated route for the public road to the Workfront at different points along the OHTL, avoiding sensitive receptors (refer to the BMP), covering loads, managing noise and dust, and conducting pre-construction biodiversity surveys) – this must be accompanied by a site map illustrating the traffic protocols.			section 3.11 below) HSE inspections (traffic) Grievance log (traffic related grievances) Delivery route map SE Log (evidence of engagement of traffic matters with the local community) Driver induction records

Reference	Activity	Project commitment	Responsibility	Timing	KPI
		• Ensure there is an adequate area for delivery vehicles to wait if they can't be offloaded immediately off the public road to minimise congestion issues. • Define signposting, warning signs, and barriers as needed at each access point from the public road. • Consider the need to place restrictions on delivery movements or working hours to recognise constraints of the local traffic patterns. • Consider the need for active traffic management by trained and visible staff at the site, if required, for a safe and convenient passage for the public. • Ensure any project-related vehicles regularly attending the site demonstrate and measures and controls for maintenance equipment and vehicles (daily, weekly, annually • Conduct consultations with neighbouring communities about the project and the schedule of works in coordination with the Project Company CLO (see section 3.16). • Induct all Contractor drivers to sign on alcohol and drug use, mobile phone use,			

Reference	Activity	Project commitment	Responsibility	Timing	KPI
		speed limits and expected behaviours, e.g., relating to interactions with the community when using the public road to each Workfront. • Coordinate transportation with other projects in the area to avoid congestion.			
CHS-04	Material and equipment laydown and stockpiles	• Ensure that materials stockpiles are placed in a safe and secure area within a central laydown area or at the Workfront.	Contractor	Pre-construction / construction	Stockpile management map HSE inspections (stockpiles)
CHS-05	Communicable diseases	• Prepare Community Health and Safety Plan outlining measures to be undertaken to avoid the spread of communicable diseases.	Contractor	Pre-construction / construction	Community Health and Safety Plan
CHS -06	Glare	• Consult with relevant aviation authorities regarding glare • Follow air traffic safety regulations • PV modules will be equipped with anti-reflection coating to minimize the reflection rate • Plant mature vegetation screening as described in section 3.2 above so that screening is effective from installation of panels.	Contractor	Pre-construction / construction	Mature screening as per requirements set out in the section 3.2 Figure 8 of this CESMP). Procurement specification Vegetation screening

Reference	Activity	Project commitment	Responsibility	Timing	KPI
CHS - 07	Labour influx	• Enhancement of local employment through sourcing employees from the direct Social Aoi and limiting the numbers of non-local workers (see section 3.13). • Enforcement of Workers' Code of Conduct containing a set of rules on behavioral standards and cultural awareness requirements for all employees (including security personnel) (see section 3.13) • Collaboration with local health and safety services to sustainably manage the pressures put on security and medical units during accidents, as well as during unacceptable social behavior (see section 3.4).			Local employment statistics (disaggregated by gender and location) Signed worker code of conduct (all workers) SE Log (evidence of engagement with local services)
CHS - 08	Landscape Value	• 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	Contractor	Pre-construction / Construction	Site inspections Corrective Action Plan Non-conformance register.

Reference	Activity	Project commitment	Responsibility	Timing	KPI
		• Within the environmental management system, prepare a restoration management plan including replanting indigenous species, and landscaping and rehabilitating construction yards			

3.11 Traffic management

The Contractor will develop a **Traffic and transportation management Plan** and integrate into all plans, procedures, method statements and risk assessments actions for implementing the requirements outlined in Table 18.

Table 18: Minimum requirements - traffic management

Reference	Activity	Project commitment	Responsibility	Timing	KPI
T-1	Route Assessment	• Complete a road transport route study for large and abnormal load delivery • Obtain relevant permits for making any required changes to roads / roadside structures • Refer to LRP for any land requirements • Plan truck routes for delivery trucks 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	Contractor	Pre-construction	Completed route transport study Transportation permits Route action report Delivery map Transportation schedule. SE Log (evidence of communication with local communities)

Reference	Activity	Project commitment	Responsibility	Timing	KPI
		addition to avoiding periods of peak traffic volumes. • Implement travel planning measures to minimize congestion. • Notify project Company of key transportation movements (refer to SEP for detail on approach)			
T-2	Driver Training and Behaviour	• All drivers shall be trained in accordance with national laws. • All drivers must adhere to mandatory rest periods • All drivers must demonstrate driver fitness • All drivers must submit to random drugs and alcohol tests if requested. • All heavy traffic vehicles must have in-vehicle monitoring systems to monitor vehicle speed and location (Project vehicles and contractors). • No unauthorised passengers shall be carried; • Perform a JHA for delivery of loads to site; • All vehicles will adhere to "rules of the road"; • A speed limit of 30 km/h on unpaved surfaces, especially the access road to the site, to be enforced and the national speed limits on public roads should not be exceeded • Avoid driving through settlements and close to residential areas, except where t is an "approved project route"	Contractor	Developed during project planning, implemented during construction. Communicated to all employees during Project induction.	Maintain copy of driver licenses and specialist licenses for all project related drivers (including sub-contractors). Copy of induction training signed off by Owner Induction training records. Signed driver code of conduct for all delivery drivers and project drivers.

Reference	Activity	Project commitment	Responsibility	Timing	KPI
		•			
T-3	Vehicle Standards and Maintenance	• Comply with national and local transit regulations; Ensure that: • All vehicle tires are cleaned before going off site. • All vehicles shall be regularly maintained so that their noise and exhaust emissions do not cause nuisance to workers or local people. • All vehicles shall be modern and comply with the applicable national emission standards for CO, NOx, SO_2 and PM10 and PM2.5. • All vehicles will use low sulfur fuels	Contractor	Prior to vehicle being used on site	Copy of vehicle maintenance log for all on site vehicles Daily and weekly vehicle inspections (vehicle condition)
T-4	Routing of construction traffic	• Routing of construction traffic to avoid nuisance to nearby sensitive receptors. • Prepare route plans with the following addressed: • Avoid nighttime driving where possible. • Always cover delivery vehicles'; load. • Comply with all statutory vehicle limits (width, height, loading, gross weight) in accordance National Road Traffic Regulations and any other statutory requirement. • Where safe and feasible, schedule deliveries to minimize travel impacts for other road users based upon local conditions and the	Contractor	Prior to the first delivery.	Stakeholder Log Project Company approved construction traffic route plans Photographic evidence of sign posted routes when applicable Copies of authorisation with relevant authorities

Reference	Activity	Project commitment	Responsibility	Timing	KPI
		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. (construction, operations, decommissioning). • 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). • Display approved route map in all vehicles. • Coordinate heavy duty shipments with other projects in the area			
T-5	Access to construction areas	• Use existing roads and the ROW where available, to avoid the need to open up new tracks to the ROW. • ROW entrance points will be demarcated and posted on the Route maps. No access to ROW except via designated access and egress points. • Access routes to be used by construction traffic will be properly signposted to prevent vehicles from leaving the designated routes • Any access routes will be selected to avoid ecologically sensitive areas (refer to BMP), and to minimise erosion.	Contractor	Developed during project planning, implemented during construction.	Approved construction traffic route plans. Incident reports where applicable. Site access signage . Route map (reviewed and approved against biodiversity sensitivities)

Reference	Activity	Project commitment	Responsibility	Timing	KPI
T-6	Road Maintenance and Condition	• 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 • Keep paved public roads free from mud and dust and to ensure that no vehicle or other items of equipment leaving the construction base deposit soil, debris or rock on public roads; and • Implement measures to ensure that the transport of mud and dust from the site onto public highways and roads is limited. • Repair road damage resulting from construction traffic during the 3-year construction period. • Restore signs, street lights, and other street furniture removed for or damaged by the movement of Project-related trucks. • Upon completion of the construction and decommissioning phases, work with local road authorities to identify damage to and restore county, communal, and agricultural roads used for Project-related heavy truck traffic. Coordinate with national road authorities (the Romanian National Road Infrastructure Company, or CNAIR) to coordinate and contribute to repair and maintenance of national roads damaged by construction (construction, decommissioning).	Contractor	Developed during project planning, implemented during construction.	Visual inspection of works vehicles on monthly basis throughout construction period. Road maintenance schedule. Weekly (or even daily) inspection of roads (in particular during high volume vehicle delivery periods) Post construction road inspection report Road repair action plan (as per inspection report above). Sign off by local authorities regarding road condition.

Reference	Activity	Project commitment	Responsibility	Timing	KPI
		• Upon completion of construction, in coordination with local road authorities and stakeholders, establish a schedule to be implemented by the Proponent and other stakeholders for maintenance of roads within the Project area during operations (construction)			
T-7	Parking facilities	• Ensure that part of the Construction Site is set aside for the parking of emergency service vehicles; and • Provide dedicated parking areas on the construction site for the private vehicles of construction personnel	Contractor	Construction.	Visual inspection of parking facilities on construction site.

3.12 Waste management

The Contractor will develop a waste management plan for implementing the requirements outlined in Table 19

Table 19: Minimum requirements - waste management

Reference	Activity	Project commitment	Responsibility	Timing	KPI
W-1	Waste management planning	• The Contractor must develop a Construction Waste Management Plan (CWMP) (this must include management of Temporary Waste Storage Areas at tower locations/laydown areas and end disposal options. • Only legally authorised waste carriers to transport and disposal of general construction waste and hazardous waste.	Contractor	60 days prior to the start of construction	Construction Waste Management Plan (WMP) License for waste carriers /holders

Reference	Activity	Project commitment	Responsibility	Timing	KPI
		• Engage waste holders through formal contract/procurement process.			Contracts with waste carriers/holders
W-2	Understand waste types and risks associated with their management and plan accordingly.	• Develop and maintain a waste inventory to document and track domestic solid waste generated, segregated, reused and consignments. • Completed waste record reports are required to show the chain of custody of the waste generated on site, its transportation and treatment/disposal. • Materials or chemicals not internationally acceptable as defined by IFC PS3 are prohibited.	Contractor	60 days prior to construction `	Site waste management plan including waste inventory Forms for waste records.
W-3	Workfront waste management	• Clearly label waste containers place them in designated waste storage locations. • Labels will be waterproof, securely attached at written in Romanian. • Workfront waste will be regularly collected / removed from site and taken to a central waste storage / disposal area. • Mandatory training program for employees to increase their awareness of waste management protocols including proper handling and storage of waste, recycling waste, reusing plastics, wood & other reusable non-hazardous materials.	Contractor	Construction	Waste storage area Inspection records (any non-compliance recorded in the Project CAP) Training Records (induction) with all workers received training.
W-4	Store, handle, transport and dispose of hazardous	• Provide a dedicated temporary hazardous waste storage area at each Work area (with sufficient capacity for anticipated	Contractor	Construction	Temporary hazardous waste storage area

Reference	Activity	Project commitment	Responsibility	Timing	KPI
	wastes in line with national regulations and good international industry practice (GIIP).	types/volumes of waste) to enable the following: • Segregate hazardous from non-hazardous waste. • Develop and maintain a hazardous waste inventory to document and track sanitary waste generated and segregated. • Sanitary wastewater tanks to be properly maintained and inspected to ensure tanks do not overflow. • Use licensed waste management operators for the collection, transportation and disposal of wastes generated at the site(s). • Use waste containers that are compatible with hazardous waste types and in line with national regulations and good practice. • Containers to be sealed and kept in good condition and labelled. • Prevent mixture of incompatible wastes that could result in chemical reactions; • Provide information on characteristics of each hazardous waste type (using Material Safety Data Sheets (MSDSs). • Transport all hazardous waste for disposal in national approved hazardous waste landfill / facility. • Provide all workers with personal protective equipment (PPE) suitable for handling each waste type, in line with waste characteristics; • No export of hazardous waste across country boundaries; and			Inspection records (any non-compliance recorded in the Project CAP) (against list outlined in project commitments) Training Records (induction) with all workers received training

Reference	Activity	Project commitment	Responsibility	Timing	KPI
		• No burning of hazardous waste. • Engage a licensed waste/wastewater contractor for the periodic removal of septic tanks. • In common with the IFC EHS Guidelines, effort will be made in training construction personnel to minimise water consumption for hand washing or showering and to ensure an understanding of water resource and wastewater issues.			
W-5	handling of concrete washout	• Concrete washout will only be undertaken in designated and signed areas to prevent leaks or spread of wastewater. • The concrete washout area will be constructed and maintained 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. • The removal of any sludge residues as solid hazardous waste will be undertaken by a licensed waste/wastewater contractor and handled as a hazardous waste.	Contractor	Construction	Concrete washout inspection
W-6	Handling and disposal of medical waste	• Any generated medical waste will be stored in appropriate medical waste containers. • All medical waste will only be handled by trained personnel.	Contractor	Construction	Medical waste receptacles Evidence of licenses for

Reference	Activity	Project commitment	Responsibility	Timing	KPI
		• Removal of any medical waste from the site for appropriate treatment, disposal/incineration will only be conducted by a licensed contractor.			carrying/handling medical waste Waste transfers notes (medical waste)

3.13 Labour and Working Conditions (including Employment) Management

The Contractor must put in place provisions to ensure the requirements outlined in Table 20 are met and outline this in a **"Worker Management and Recruitment Management Plan".**

Table 20: Minimum requirements - labour and working conditions

Reference	Activity	Requirement	Responsibility	Timing	KPI
L-1	Labour Management	• Develop Worker Management and Recruitment Management Plan	Contractor	60 days before Site mobilization	Worker Management and Recruitment Management Plan
L-2	Human resource management	• Ensure adequate workforce management in line with EBRD requirements and the law of the Romania (including labour conditions, social security, minimum wage, working hours, no child/forced labour etc.).	Contractor	60 days before Site mobilization	Human Resources (HR) policies[14] aligned with PR2 and national labour regulations.
L-3	Working terms and conditions	• Comply with the Labour Code of Romania • Workers must all be contracted; no casual or day labour will be used. • Workers must be provided with a copy of their contract, which includes employer name, salary, working conditions, payment schedule, overtime provisions, leave	Contractor	60 days before Site mobilization	Human Resources (HR) policies aligned with PR2 and national labour regulations. Worker contracts (all workers)

[14]Human resources policies are the formal rules and guidelines that Contractors should have / put in place to hire, train, assess, and reward the members of their workforce. These policies should prevent any form of discrimination in the workplace and ensure that all employees are treated fairly and equally. These policies help employers and employees understand their rights and responsibilities and set clear expectations about how to behave within the organisation. HR policies should be in written form – they may be documented in company handbooks, collective agreements, and may include dedicated policies on specific issues like non-discrimination.

Reference	Activity	Requirement	Responsibility	Timing	KPI
		provisions, disciplinary procedures and termination of the contract, at a minimum. • Migrant workers must be contracted under the same conditions as national workers. • Workers will be allowed to participate in collective bargaining and/or labour unions. Project Contractors will negotiate in good faith with such collectives if required.			Union associations (as preferred by workers)
L-4	Worker accommodation	• Assess the housing stock and develop a workforce housing plan that will ensure that availability of housing for the general population is not adversely affected. This may include providing a mix of workforce accommodation facilities, management housing complexes, and use of existing housing stock. • Ensure that any proposed worker accommodation is submitted for review and approved by the E&S Manager prior to selection or use. • If workforce housing is constructed, this should be designed and developed within a longer-term plan of the infrastructure becoming part of the overall housing stock.	Contractor	60 days before Site mobilization	Workforce Housing Plan Worker Accommodation Plan (temporary worker housing) Long-term housing management plan

Reference	Activity	Requirement	Responsibility	Timing	KPI
		• Consider providing favourable financing options for local residents to develop and/or improve hostels/ accommodation facilities			
L-5	Worker conduct	• Prepare a Worker Code of Conduct and require workers (and security personnel) to sign it during their site induction (this must include GBVH expectations)	Contractor	60 days before Site mobilization COC signed within two weeks of the appointment of each contractor and sub-contractor on-site	Worker Code of Conduct Signed Code of Conduct (for each worker)
L-6	Employment (local)	• Develop "Recruitment Management Plan" to promote employment of local workers defined as "Social AoI and the wider area of Arad County and the West Region". • Target workforce from the close and medium vicinity of the projects in West, South-East and East Romania • Prioritize hiring from those passing through the" project training centre" to be developed by Rezolv/ Renew Acad • Embed commitments to transparent recruitment process, based on merit and free of discrimination. This is to be reflected in:	Contractor	60 days before Site mobilization	Recruitment Management Plan Recruitment database (local workers) Job profiles (distributed in the local community) with emphasis on encouraging women applicants. Construction Labor statistics are disaggregated by gender, origin (within Romania), and skill level. Evidence of engagement with the local community on

Reference	Activity	Requirement	Responsibility	Timing	KPI
		• 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. • Description of the Worker's Code of Conduct, highlighting labour conditions with an aim to reduce the risk of gender-based violence and harassment. • Details of worker's grievance mechanism that will be disclosed during the recruitment process and the employment period. • Documentation that will outline labour rights, such as the working hours, compensations for overtime, and any additional employee benefits. The documentation will also highlight the workers' right to self-organization and collective agreements. • Use inclusive vocabulary in job descriptions in order to encourage women and other vulnerable groups to apply.			local recruitment plan, selection criteria (SE Log) Signed worker code of conducts Worker's grievance mechanism disclosed around site. Worker handbook (setting out worker rights) available to all workers. Evidence of collaboration with local organisations / unemployment agencies for local hiring (SE Log). Evidence of communication with training providers (SE Log) Number of apprenticeship schemes offered. Number of Scholarships to high school children to continue education.

Reference	Activity	Requirement	Responsibility	Timing	KPI
		• Collaborate with relevant local organizations to develop the process by which employment positions will be advertised by these institutions, as well how candidates will be identified: • Collaborate with the county-level unemployment agencies to facilitate reaching out to women and members of other vulnerable groups (particularly Arad County Agency for Employment, Local Employment Agency Chisinau-Cris); • Engage with training institutions to provide training programs and skills upgrading; • Offer apprenticeship and partner with local contractors to provide apprenticeship programs; • Offer scholarships to encourage high school graduation and encourage interest in the industry (particularly with the Technological High School Chisineu-Cris); • Frequently and in advance, communicate (local radio, Facebook, local online media, or other media)			Evidence of efforts for promoting jobs in the local community (SE Log) e.g. radio, advertisements etc.

Reference	Activity	Requirement	Responsibility	Timing	KPI
		within Arad County, Chisneu-Cris and specifically, within the Social AoI, the Project schedule, the type and jobs to be offered at the Project, education and skill requirements/ qualification criteria, and information on how to apply for jobs to increase local interest;			
L-7	Labor conditions	• Hire an experienced independent third party to undertake quarterly labour audits on all sub-contractors following protocol defined in Contractor LMP (as approved by the Lenders)	Contractor	Within one month of the appointment of each contractor and sub-contractor on-site and quarterly thereafter	Labor audit report.
L-8	Worker grievances	• Establish a worker grievance mechanism will be implemented and disclosed to all workers. Means of anonymously raising a grievance (such as a grievance box) will be provided on-site.	Contractor	60 days before Site mobilization	Worker Grievance mechanism disclosed around site.
L-9	Worker training	• Confirm training and re/up skilling programmes available for the local workforce. This is to include: • Identification of entry-level jobs that do not require prior experience and	Contractor	Construction phase	#nol of local persons hired on the Project # of people progress to operation phase # of female workers hired

Reference	Activity	Requirement	Responsibility	Timing	KPI
		education, and provide on-the-job training; • Develop career plans and skill upgrading for hired employees to help them advance and reach more skilled and senior positions and to enable progress from construction to O&M jobs; • Monitor gender breakdown of training and employment as part of annual monitoring to measure gender balance; • Ensure equality in remuneration for workers of the same skill level, regardless of gender, age, sexual orientation, religion, or nationality; • Follow established policies and internal best practices to promote harassment free workplace; health, safety, and security; and multi-cultural and individual considerations; • Clearly and frequently, communicate labour rights			No grievances related to equality/discrimination etc.

3.14 Cultural heritage

Cultural heritage requirements are outlined in Table 21 and include management of known and chance finds.

Table 21: Minimum requirements - cultural heritage

Reference	Activity	Requirement	Responsibility	Timing	KPI
CH-1	Known Cultural heritage	• Develop Cultural Heritage Management Plan (CHMP) • Implement preventive archaeological research (rescue excavations) in all perimeters identified by the authorised archaeological diagnostic as requiring such measures, prior to the commencement of construction works. These investigations will be carried out by accredited archaeological specialists, in accordance with Romanian archaeological standards and procedures, and will form the basis for obtaining the Certificate of Archaeological Discharge. Archaeological materials recovered during preventive investigations will be documented, conserved, and transferred to the Arad Museum Complex in line with national requirements. • Specific design measures, such as screening bunds or noise reduction	Contractor	Pre-construction	CHMP Site layout map (showing avoidance of CH features) Culture heritage field survey report Updated CHMP (and survey work) following field survey report. Archaeological discharge for identified sites SE log (showing meetings with Arad County Directorate of Culture and Ministry of Culture)

Reference	Activity	Requirement	Responsibility	Timing	KPI
		measures, to address indirect impacts as defined in the ESIA; • Outlines for micro siting to avoid cultural heritage or creating archaeological exclusion zones to protect sensitive resources as defined in the ESIA. • Regular engagement with the Arad County Directorate of Culture and Ministry of Culture as needed to agree site-specific mitigation measures; • Conduct Field survey and assessment for potentially impacted resources. In the absence of more detailed information on Cultural Heritage resources identified in the baseline, additional field survey will be required under the CHMP to determine the full extents and significance of Project impacts to be undertaken by an appropriately qualified Cultural Heritage specialist. • Update CHMP will need to be updated to reflect the findings of this additional survey. • Implement archaeological discharge procedures will be undertaken in			

Reference	Activity	Requirement	Responsibility	Timing	KPI
		accordance with permits issued by the competent cultural heritage authorities.			
CH-2	Access (to CH features) management	• Prepare Memorandum of Understanding (MOU) for access management with local communities regarding access and activities). • Access arrangements will be made to the satisfaction of identified stakeholders through a Memorandum of Understanding agreed to by authorities and identified stakeholders, which will allow unrestricted access to Cultural Heritage resources.	Contractor	Prior to start of construction	Access management MOU
CH-3	Unknown cultural heritage	• Develop a chance finds procedure • Chance finds procedure to be communicated to all workers at the site induction.	Contractor Overseen by Project Company	60 days before Site mobilization or any site clearance works (whichever is earlier) for the duration of foundation work)	Documented 'Chance Finds Procedure' Evidence of training, e.g. (induction / Toolbox talk)

3.15 Security

Security requirements are outlined in Table 22 and include management of known and chance finds.

Table 22: Security requirements

Reference	Activity	Requirement	Responsibility	Timing	KPI
S-1	Security risk assessment	• Perform a **Security Risk Assessment (SRA)** to confirm potential risks and to define actions to minimise the risk	Contractor	Pre-construction	SRA reviewed and accepted by the Project Company.
S-2	management	• prepare a site **Security Management Plan (SMP)**	Contractor	Pre-construction	SMP reviewed and accepted by the Project Company.
S-3	Security approach	• Engage private security personnel / or private security contractors to implement security at site two weeks prior to mobilisation on site. • Perform background checks on all security personnel prior to engagement on the project.	Contractor	Pre-mobilization of security personnel	All personnel have security background checks (evidence to be retained on site)
S-4	Security training	• No armed security. • Perform training in use of force and Human rights principles for all security personnel. • Training and enforcement of Workers' Code of Conduct containing a set of rules on behavioural standards and cultural	Contractor	Pre-construction	Training attendance sheets and content All security personnel received training (100%)

Reference	Activity	Requirement	Responsibility	Timing	KPI
		awareness requirements for all employees • Training on gender awareness • Train in community grievance mechanism • Train in emergency response requirements			prior to start of works. Signed Code of Conduct
S-5	Security interface with Local Community	• Inform the affected communities that they may use the community grievance mechanism to express concerns about security personnel. It will investigate any allegations of unlawful or abusive acts of security personnel and take the necessary action to prevent recurrence.	Project Company	Pre0constuction (ongoing through construction) alongside disclosure of the grievance mechanism.	SE Log (and minutes of relevant meetings) Grievance Log

3.16 Land Acquisition and Livelihoods

Land acquisition and livelihood restoration are outlined in Table 23 and include management of known and chance finds.

Table 23: Livelihood and land acquisition

Reference	Activity	Requirement	Responsibility	Timing	KPI
LV-1	Land Acquisition	• Develop a Land Acquisition Plan (LAP) • **Include Contingency compensation framework**: If avoidance cannot be fully achieved, compensation will be calculated using a herd-per-day formula based on the following assumptions: o DAH-1 (~45 cattle) at €2.50 per head per day; and o DAH-2 (~1,100 sheep) at €0.55 per head per day; o €100 per day for additional labour. • For example, if access is restricted for seven days for sheep and three days for cattle, the estimated compensation would be €4,235 for sheep, €338 for cattle, and €1,000 for labour, totalling €5,573. Herd size and feed cost to be verified before any payment through direct engagement with affected households, supported by local authority confirmation and market price checks. Documentation will include signed statements and photographic evidence prior to payment. • **Subsidy protection:** The project acknowledges the importance of agricultural subsidies under APIA	Project Company	Pre-construction	LAP SE log (with evidence of disclosure to PAPs' / PAHs All compensation payments made as per LAP. Evidence of monitoring for crop damage.

Reference	Activity	Requirement	Responsibility	Timing	KPI
		schemes. To prevent any loss of payments due to temporary soil disturbance, the developer will notify APIA in advance of works, confirm compliance requirements before construction, and reimburse any verified subsidy losses or penalties in full. • **Pastureland rehabilitation:** Any disturbed pastureland will be restored to its original condition or better immediately after construction, including reseeding, soil stabilization, and removal of construction debris. Restoration will be verified by the Town Hall and affected households before sign-off. • **Agricultural road restoration**: the agricultural road DE 553/1 will be restored to its pre-construction condition, respecting farmers' request to avoid graveling to prevent cattle injuries. Restoration will include grading and cleaning, with improvements where feasible. • **Engagement and grievance management:** The project will maintain continuous engagement with affected households and local authorities throughout implementation. A grievance mechanism will remain operational, providing accessible channels for complaints and ensuring resolution within 30 days.			Number of subsidy penalties triggered by project activities % of verified subsidy losses reimbursed within 30 days % of disturbed pasture area reinstated within agreed timeframe Road graded and cleaned post-construction Grievance mechanism (including procedure for accidental damage)

Reference	Activity	Requirement	Responsibility	Timing	KPI
		• **Completion:** Livelihood restoration will be considered complete when grazing and agricultural access routes are fully restored, no outstanding subsidy issues remain, and affected households confirm satisfaction with restoration measures. Verification of these criteria will be undertaken by the Lenders' Technical Advisor (LTA) as part of the Detailed Review and Lender Monitoring process, in accordance with the monitoring and evaluation framework described in Chapter 11. The developer will cooperate fully with the LTA to provide access and documentation required for this independent verification.			
LV-2	Accidental damage	• Develop an **Accidental Damage Compensation Procedure** to guide compensations during the Construction and Operation of the Project	Project Company	Pre – construction	Accidental Damage Compensation Procedure

3.17 Stakeholder engagement and grievance management

3.17.1 Stakeholder engagement

The **Project Stakeholder Engagement Plan** is the principal document governing how Project-related information will be managed and communicated to stakeholders. The Project Company will be responsible for all external communications to the community. The Project Company will nominate a Community Liaison Officer (CLO) through which the Contractor will manage interactions with the broader community.

The Contractor will nominate a counterpart community liaison officer. The Contractor CLO is responsible for adhering to and supporting the Project Company CLO to implement the requirements of the SEP. The Contractor CLO is responsible for providing the Project Company CLO with a detailed schedule and sufficient notice of Project activities that are likely to impact local communities to allow for transparent and effective communication regarding the Project.

Following the SEP, the Project Company CLO will maintain a record of all consultation and correspondence (verbal or written) with stakeholders in a community consultation log and grievance log managed by the Project Company CLO. The Contractor must pass on all community grievances received directly to the Project Company CLO for logging and review. The Contractor CLO must work with the Project Company CLO to resolve grievances following the Project Company grievance mechanism as set out in the SEP.

Outside any temporary site offices, the Contractor will erect an E&S notice board in a prominent position visible to all personnel and place a sealed mailbox where the community may post their grievances. The Contractor and Project Company shall display pertinent E&S performance information on the notice board alongside information relating to worker and community grievance mechanisms.

The Contractor will notify the Project Company CLO with sufficient notice to inform communities of the pending work scope as listed above, as well as the duration of tasks and location of activities in particular movement of abnormal loads. Communication will be in Uzbek, with key messages in other local languages as appropriate. In addition, the CLO will participate in safety briefings in local schools (this will be in Uzbek and other languages where appropriate). Further information is provided in the SEP.

3.17.2 Community notifications

The Project Company CLO, with support from the Contractor CLO, will disseminate information relating to project emergency incidents and vehicle movements in a manner agreed with local communities. In addition, the Project Company CLO may participate in safety briefings. The Contractor will notify the Project Company CLO with sufficient notice to inform communities of key works scope that may impact the local community. Communication will be in Uzbek, with key messaged communicated in local dialects as stated in the SEP. Topics for communication with the local communities are:

- Commencement of works;
- Start of the concrete batching process;

- Start of delivery of abnormal loads; and
- Delivery routes and timings

3.17.3 Employment notifications

It is important to engage the local communities of Grăniceri, Pilu and extend to Socodor, Chisineu-Cris, Simand, Macea ATUs in the preparation and implementation of training and education programme.

Via the mechanisms outlied in the SEP, the Project Company supported by the Contractor will:

- provide clear information on the number, type and limited timescales of employment opportunities.
- ensure information on the employment and the procurement strategies is disclosed at all settlements within the AoI.
- Continuing to engage local people in the employment opportunities and work with suppliers to enable capacity building, procurement, employment and contracting opportunities at a settlement-level, as part of maximizing the positive benefits.

As part of the SEP, a Community Grievance Mechanism will be implemented to ensure that individuals who have concerns or complaints about the Project or wish to report their potential expectations or concerns related to local economy and employment can communicate directly with the Project.

3.17.4 Project external grievance mechanism

An overarching Project grievance mechanism (GM) must be set up to comply with EBRD PR10 requirements to ensure that all comments, suggestions, and objections received from the Project stakeholders, especially from the nearby communities and facilities, are dealt with appropriately and promptly. The grievance mechanism is an important feedback mechanism that can improve Project impact and mitigate the risks.

This mechanism will be available to all Project stakeholders and other affected parties, enabling them to submit questions, comments, suggestions and/or complaints and provide feedback on all Project-related activities. The primary grievance focal point on Site to raise grievances will be the Site Manager appointed by the Contractor and the Project Company CLO, who will be responsible for the overall implementation of the GM. The contact information of both of these entities will be provided at all locations where the work is being performed and during information disclosure activities.

The Project Company CLO will keep a Project grievance log containing all grievances received by the Project (from a local third party, Site Manager, or other), monitor the resolution of the grievance, and be responsible for ensuring the grievances are closed out promptly.

Grievances can be raised during the construction phases through the following methods:

- Via mail or e-mail
- On the website (Project Company)
- Via telephone [insert number]
- Directly to the site manager *[insert number]*
- Project Company CLO *[insert number]*

- During public meetings and consultations
- Submission on site of a Grievance Registration Form (which is provided in Annex 1) via box on site.

The Project Company CLO will be responsible for reporting engagement and grievance-related data. Further details on the grievance mechanism are included in the Stakeholder Engagement Plan (dated March 2022).

4 Site EHS Communication

4.1 Meetings

The Contractor will adopt a programme of HSE meetings (daily & weekly) which will specifically include E&S issues. This scheduled will be approved by the Project Company. The purpose of the meetings will be to ensure the active participation and commitment of the Contractor to implement the CESMP and to disseminate information to key personnel, communicate E&S performance, report and discuss any incidents, review the progress of corrective actions; and assign responsibilities/actions or additional resources where required. The Contractor will keep a record of the meeting agenda signed minutes, and actions.

5 Training

5.1 Contractor training

The Project Company will undertake introduction training on EBRD and national environmental requirements, the content of ESMP, monitoring and reporting obligations, contactor obligations related to stakeholder engagement, labour management and grievance management and redress. The training will also include performance management for managing and reporting against the KPIs (as relevant). This training will be part of induction training and contractor onboarding activities.

5.2 Subcontractor competence and training

The Contractor must ensure that all subcontractor personnel performing duties under this ESMP are competent based on the appropriate education, training and/or experience and shall retain site records to prove this requirement.

The Contractor will define competence and training needs as part of project planning and work method statements and only qualified trained people will perform qualified tasks. To do this the Contractor must establish a "**Competence and Training Matrix"** and maintain a record of all training activity and evidence of all worker training on-site.

The Contractor shall always maintain an updated list of all personnel employed under the Contract, their competencies, training needs and details of the training sessions they have attended, including the attendance date. The Contractor shall provide training and attendance records to the Project Company upon request.

The Contractor shall be responsible for supervising and enforcing EHS training provided by Subcontractors and Suppliers to all personnel employed under the contract with the

Subcontractors and Suppliers. A separate register must be kept concerning the competencies of security guards (as per IFC PS4).

The Project Company EHS Manager is responsible for managing the provision of environmental training for the Project Company's project implementation team on their responsibilities under the Owners ESMS and this ESMP. The Project Company will record the training needs of the Project delivery team and maintain records of training.

A list of minimum training requirements is provided in the following sections. This list is not exhaustive, and further training requirements may be identified due to the outcomes of risk assessments or accident/incident investigations.

5.2.1 Induction training

The Contractor will design and deliver to all Workers, including Project Company personnel and subcontractor workers, mandatory Health, safety, environment, social and security induction training covering all aspects of this CESMP and the Contractor management plans. All Contractor personnel and visitors shall have completed the Project's EHS induction before having access to the Site and/or commencement of a task or any other works on the Site.

A copy of the induction training program shall be submitted to the Project Company for comment within 14 days of the Notice to Proceed. The Contractor shall provide training and attendance records to Project Company upon request. The Project Company must sign off the content of the induction training but will cover, as a minimum:

- Project HSE program & policy and implications for the working methods and responsibilities for all employees;
- Site/project-specific HSE guidelines / Rules;
- Work permit procedures;
- Emergency evacuation process and emergency contacts;
    - First–aid facilities, etc.;
    - Use of fire extinguishers and lifesaving equipment;
- Road Safety Management;
    - Workforce transportation safety;
- Personal Protective Equipment (PPE);
- Environmental & Social Awareness;
    - Environment management and housekeeping;
- Waste Management
    - Rules regarding minimisation of waste generation;
    - Waste different hazard classes;
    - Labelling of waste storage containers;
    - Waste handling (storage, loading/unloading, transportation);
- Water and sanitation;
- Occupational Health & Hygiene;
- Reporting accidents/incidents / unsafe conditions and acts / near misses;
- Chemical Handling and Spill response;
- General requirements for good working conditions, terms of employment, and the right of workers to self-organisation

- Worker code of conduct and workers grievance mechanism (including GBVH requirements) ;
- Chance finds procedure
- Community engagement and safety.

5.2.2 Specialist Training

Specialist training may include:

1. Setting to work briefing
2. Toolbox talks
3. Task-specific training (in the field)
4. Specialist H&S training / Pre-qualified training (by a qualified third party) for specific activities e.g. working at heights, working in confined spaces, working with live equipment.
5. First Aid training

   Specific environmental and social trainings . Training that may be provided via the different approaches is summarised in Table 24

Table 24: Types of training

Training Types and Audience	Types of training
Setting to work /toolbox talks - all employees)	• Emergency Preparedness and Response • Near miss and incident reporting • PPE • Hazard identification • Good Housekeeping • First aid • Waste management • Accident prevention • Manual handling • Permit to Work
Specific environmental and social trainings	• Generic training on environmental and social management plans. • Training package on specific topics such as biodiversity conservation (protected species and behaviour) and cultural heritage sites,
Task-specific training - Specific employees as identified during the Job Hazard Analysis and risk assessment	• Hand and power tools • Crane operation (including crane signal and rigging practices**)** • Lifting • Working at heights (scaffolding and ladder, fall arrest systems) and rescue training • Hazardous material handing

Training Types and Audience	Types of training
	• Driver training (appropriate to specific vehicle) • Electrical safety • Welding safety
Specialty training (erection and commissioning engineers)	• Competent OHTL Tower rescue • General industry or construction safety (OSHA), • first aid, including cardiopulmonary resuscitation and automated external defibrillation • electrical and electrical metering safety • Metering equipment practical evaluations
First Aid training	• Essential life support and resuscitation (CPR and mouth-to-mouth resuscitation) • Electrocution • Unconsciousness • Shock • Fractures • Burns • Control of bleeding, wound dressing • Choking • First aid for minor injuries • Common illnesses, seizures, eye injuries and heart attacks

6 Monitoring and Auditing

6.1 Monitoring requirements

6.1.1 Project Company

The Project Company must provide monthly reports to the Project Director on performance and compliance with the CESMP and Lender obligations. To monitor progress during actual works, the Project Company will refer to the key performance indicators (KPIs) outlined in section 3.0 to assist the compliance reporting centrally. The KPIs will help Project Company keep track of the progress. The Project Company may amend the KPI's during the Project implementation.

A compliance report will be prepared by the Project Company that sets out the project's compliance with the ESMP's requirements. The Project Company will develop a standard checklist to support this activity.

If necessary, third-party audits may also be implemented to confirm compliance. Depending on the KPI, monthly reports with relevant Project Company or Contractor information will be submitted to inform the reporting.

Any non-compliance will be followed up in a non-compliance report issued to the Project for rectification. The non-compliance report will include an outline of the non-compliance issue, action for rectification, timelines for implementation and responsibility. Non-compliance will be tracked in a project Corrective Action Plan.

The Project Company will prepare and submit reports on stakeholder engagement activities on a semi-annual basis. These reports will provide a summary of all public consultation activities (in the form of a stakeholder engagement log), grievances (grievance log) and resolutions (grievance incident form).

The Project will also disclose a summary of the implementation of the GM and grievances received in an annual report to stakeholders. The information will be anonymous; no identifying information on specific individuals will be included in the reporting.

6.1.2 Contractor

The Contractor will monitor and measure the performance of its activities regularly to assess whether the Project is complying with legal requirements, is meeting its policy commitments, achieving established objectives and targets, and meeting key performance indicators (KPIs) as set out in this CESMP. Monitoring will include:

- Relevant aspect and impact (i.e., air quality, noise, wastes);
- Authority/entity that will receive the monitoring report;
- Document source reference (where applicable);
- Commitment & Applicability, elaborate on what should be monitored, where samples should be taken and when the monitoring should be done;
- Monitoring Requirements;
- Parameters to check; and
- Frequency and duration of monitoring.

Table 25: Summary of Project KPIs

Phase	What	How	When	Why	Cost	Who
Project preparation	Fair and equitable labour practices across the sub-projects	% of worker grievances resolved on time	Monthly	Labor welfare	Within project budget	Contractor
	Occupational health and safety	% Incident investigation completed on time Lost time injury frequency rate by Contractors Person hours worked	Monthly	Public and workplace health and safety	Within project budget	Contractor
	Waste management	Total waste generated % Waste to landfill	Monthly	Timely completion of all waste disposal	Within project budget	Contractor
	Monitor community relations	Number of Community Complaints received	Monthly	Identification of community concerns before they escalate	Within project budget	Contractor
	Implement an effective grievance mechanism	% Community Complaints received by Contractors resolved within 30 days	Monthly	Identification of community concerns before they escalate	Within project budget	Contractor
Project implementation	Labour monitoring	% of worker grievances resolved on time	Annually	Labor welfare	Within project budget	Contractor
	Local Hiring	% of local hires (as defined in the CESMP)	Monthly	To assess against local hiring targets	Within project budget	Contractor
	Woker conduct	100% of workers signed worker code of conduct	Monthly	To address worker conduct (including GBVH) matters.	Within project budget	Contractor

Phase	What	How	When	Why	Cost	Who
	GBVh	Number of GBVH project-related grievance reported	Monthly	To address worker conduct (including GBVH) matters.	Within project budget	Contractor
	Monitor community relations	Number of Community Complaints received not closed out in allotted timeframe	Monthly	Identification of community concerns before they escalate	Within project budget	Contractor
	Training	100% of all employees receive site induction	Monthly	Timely completion of all training	Within project budget	Contractor
	Training	100% of all drivers on site and delivery drivers signed driver induction	Monthly	Timely completion of all training	Within project budget	Contractor
	Waste	% Waste to landfill	Monthly	Timely completion of all waste disposal	Within project budget	Contractor
	Waste	All waste handlers are licences	Monthly	Waste disposal aligned with GIP	Within project budget	Contractor

Phase	What	How	When	Why	Cost	Who
	Energy consumption	Total energy consumption	Quarterly	To identify energy savings as a result of the Project.	Within project budget	Contractor
	Emergency Dills	Number of emergency drills per month	Monthly	Ensure dills are taking place	Within project budget	Contractor
	Site induction	All workers inducted before works commence	Monthly	Ensure adequate training on general requirements of CESMP before works commence	Within project budget	Contractor
	Hazardous materials	100% materials have MSDS and risk assessment	Monthly	All risks related to materials are understood and managed on site	Within project budget	Contractor
	Welfare provision	Number of readily accessible toilets on site at a ratio of 1:25 workers (plus female toilets)	Monthly	Monitor welfare provision	Within project budget	Contractor
	Drinking water	Litres of water on site (drinking) is equivalent to 1.5 litres per person	Monthly	Monitor welfare provision	Within project budget	Contractor
	Rehabilitation of disturbed areas	Temporarily disturbed areas are returned to their original sated within 3 months of finalisation of works	Monthly	Minimize spread of invasive species and encourage timely restoration of disturbed work area.	Within project budget	Contractor
Stakeholder Engagement	Ongoing communication with the local community	Notifications to local community	Monthly	Monitor communication	Within project budget	Project Company

6.2 Audit requirements

6.2.1 Project Company

The Project Company will implement the following audit plan for the Project to supervise and measure the management system's effectiveness. The audit program will be through a combination of inspections and audits (internal and third-party):

- E&S site set up audit;
- Monthly site inspections/audits
- Site closure audit; and
- Unscheduled audits may be undertaken at any time concerning HSE and labour matters.

6.2.2 Contractor

The Contractor will evaluate the compliance status of its activities and operations against the requirements of the CESMP at an appropriate frequency, including:

- Daily inspections (for the following topics as a minimum)
    - H&S inspections
      Environmental inspections
    - Accommodation inspections
    - Security inspections
- Weekly walkovers (may include Project Company)
- Monthly audits (separately for H&S, Environmental and Labour)

The Contractor will develop a schedule of inspections and audits in the C-ESMP. And must include accommodation and labour audits for approval by the Project Company.

The findings from all inspections and audits (internal and external audits) and any corrective actions shall be reported by the Contractor via an audit report to the Project Owners within 1 week of the audit taking place. All non-compliances and actions arising from audit findings will be recorded and tracked according to the **'Corrective Action Plan'.** The Contractor and the Project Company shall agree on the methods/procedures and timeframes to close any non-compliance findings.

The Contractor CESMP will define a schedule of internal audits and inspections to ensure implementation of CESMP and continuous improvement.

6.2.3 Third-party

In addition, the Project Company will coordinate for independent third-party audits on behalf of the Financing institutions.

6.3 Review

The Project Company will work closely with the Contractor to identify ways to minimise E&S impacts. Through the implementation of the Project, the Contractor will continue to find and implement ways to reduce impacts and deliver positive outcomes through each stage of the Project. The results of site inspections, audits and incident reports will be used to drive continuous improvement.

7 Reporting and Document Control

7.1 Near miss and incident reporting

In the event of an E&S incident, the Contractor will complete an 'Incident Report' and review the cause of the incident, determine the appropriate action required, and define relevant corrective action(s). Any changes in the CESMP documentation as required by the corrective action shall be reflected by amending respective procedures or instructions. The Contractor shall ensure that these changes are communicated to all relevant staff. All near misses, non-conformances and associated corrective actions must be tracked via a 'Corrective Action Plan' to monitor the close out of all corrective actions.

The Contractor must establish a site procedure for an incident investigation that aligns with the categories set out in Table 26. Under the site procedure, incidents must include near-miss non-compliance in the environment, health & safety, security and labour. All incidents should be recorded on an incident reporting form.

Table 26: Project incident and accident reporting requirements

Incident category	Definition	Project KPI
Fatality	Death occurring on the site. Fatalities arising from natural causes may be excluded after analysis if a natural death can be demonstrated.	Zero fatalities
Dangerous occurrences / Major injury (or Reportable injury as defined under RM OSH Law)	Reportable incident under national law	Number of Recordable Incidents (RWC, MTI, and LTI) per 200 000 hours worked (to be compared against industry standards)
Lost time injury	A serious injury which results in a worker being incapacitated for more than three consecutive days	LTI rate: number of LTIs per 200 000 hours worked (200 000 hours correspond to 100 full-time workers during a year = 40 hours per week 50 weeks) to be compared against industry standards)
Incidents / near misses	Actions that can potentially cause injury, ill health, or loss in the areas of environmental, health & safety, security and labour management.	100% near-miss incidents resolved within 24 hours of observation

Incident category	Definition	Project KPI
First aid injury	Incident that causes an injury or illness which requires limited treatment available at the site	
Worker complaints	Complaints about work that are carried out in unsafe or unhealthy conditions	All complaints are resolved within 5 working days.
Property injury (community)	The incident that causes damage to property outside the project ownership (community property) that has not been agreed in advance.	100% of complaints were resolved following the grievance redress procedure
Security incident	An incident that involves security guards or other law enforcement officials. This may or may not result in an injury (which should be reported separately).	100% of complaints were resolved following the grievance redress procedure
Vehicle accidents	An incident that involves a project vehicle (e.g., during delivery of equipment or personnel) that occurs off-site.	Zero transportation incidents
Environmental incident	See **Error! Reference source not found.** below.	100% environmental incidents resolved within 5 working days (as recorded in the Corrective Action Plan)
Non-compliance	Failure to meet requirements set out in Law or project permit	Zero non-compliances
Non-conformance	Failure to meet requirements of IFC Performance Standards or GIIP	All non-conformances closed out within 48 hours.

The Contractor will record all actions from incident reporting into the CAP. The CAP should be used to monitor close out of all actions and progress should be monitored in the weekly construction progress meeting.

An Incident Report must be completed for any significant or minor environmental incident and may be completed for any near miss at the discretion of the HSE Manager.

The Contractor must notify the Project Company within 4 (four) hours of a fatality of dangerous occurrence.

All incidents must be recorded (this includes near misses even if no incident report is produced) in the weekly statistics provided in the monthly conduction progress report.

7.2 E&S and H&S reporting

7.2.1 Project Company

The Project Director (or his nominated delegate) will provide a monthly report to Lenders that will include reporting on E&S matters as collected from the Contractor.

7.2.2 EPC Contractors

The EPC Contractors shall provide a written report to the Project Company's Construction Director on a weekly and monthly basis providing as a minimum the information defined below. Each EPC contractor should compile a set of information based on data received from all its sub--contractors The EPC contractors are responsible for tracking in separate lines the performance of each sub-contractor.

- A highlight of E&S activities and events of the past month including:
- Labour indicators (disaggregated by gender and age)
- Number of workers on site (per subcontractor) (split weekly)
- Working hours and overtime (total)
- Maximum standard hours worked.
- Maximum overtime worked.
- Maximum hours worked in any one week.
- Number of subcontractors on site
- Information on accommodation locations for all subcontractors
- Environmental, Health, Safety and Social Status Report
- Permits and Authorisations
- E&S documentation development
- E&S personnel (changes/additions)
- E&S communication (site)
- E&S audits completed
- E&S training completed
- NCR, observation and corrective action plan status
- Worker grievances
- Monitoring results (noise, AQ, etc.)
- Inspection results
- E&S data and analysis
- E&S indicators (chance, finds, water supply, effluent discharges, waste, fuel use, drills, inductions, grievances etc))
- Details of quantities of waste generated and sent for recycling/disposal;
- Details of environmental inspections/audits;
- Number of drills performed.
- Accommodation location for all workers

- Worker grievances
- Local hiring
- Number of personnel inducted (and signed code of conduct)

The following forms (or equivalent) may be used for this purpose.

FORM A – HSE and Social Statistics

Project name:								
Form A – E&S Statistics								
Weeks	1	2	3	4	5	6	7	X
Fatality	0							
Dangerous occurrences / Major injury (or Reportable injury as defined under OSH Law)	0							
Lost Time injury	0							
Cumulative person-hours lost	0							
First Aid injury[15]	0							
H&S Incidents[16]	0							
Property incident	0							
Security incident	0							
Environmental incident	0							
Social Incident	0							
Near miss (H&S, E, Security)	0							
Non-compliance (legal)	0							
Non-conformance (ESMF/ESMP)	0							
GBV/SEA/SH								
COVID-19 cases								
Total working hours (cumulative)								
Total working hours (this week)								

[15] First aid is immediate treatment given to the injured person until the proper medical is reached

[16] Any unplanned or unintended event or circumstance which could have resulted or did result in harm to a patient

FORM B – Environmental and Social Data (construction)

Project name:								
Form B – E&S Statistics								
Weeks	1	2	3	4	5	6	7	X
Emissions to aid (dust) exceedances								
Noise exceedances [17]								
Municipal water consumption (m3)								
Drinking water (m3)								
Total wastewater discharges are collected by tanker for offsite treatment and disposal or discharged directly to the sewer.								
Total discharge to surface waters/ground								
Hazardous solid waste (volume and type)								
Type X								
Hazardous liquid waste (volume and type)								
Type X								
Non-hazardous waste (volume and type)								
Type X								
Recycled (solid) (volume and type)								
Type X								
Recycled (liquid) (volume and type)								
Type X								
Emergency response drills/training completed.								
Toolbox talks completed								
Induction completed								
Key equipment fuel use (quantities according to fuel type)								
Transport vehicles fuel use (quantities according to fuel type)								
Refrigerants (quantities according to each refrigerant type)	0							
Electricity consumed	0							

[17] Noise monitoring should be performed as per the locations defined in the C-ESMP.

Project name:								
Form B – E&S Statistics								
Weeks	1	2	3	4	5	6	7	X
Community Grievances								

FORM C – Labour Statistics

Project name:						
Form C– labour category						
Position type	Local*		Romania		International	
	M	F	M	F	M	F
Low-skilled worker days/hrs						
Semi-skilled worker days/hrs						
Skilled worker days/hrs						
Managerial position						
Total						

*Local is defined as within 25km of the proposed works (or as defined by the sub-project screening)

FORM D – Labour Numbers

Project name:								
Form D – Labour numbers								
Weeks	1	2	3	4	5	6	7	X
TOTAL EMPLOYEES (no. of employees on site)								
[insert contractor name]								
Total working hours (permanent)								
Total overtime hours worked.								
Total working hours (male)								
Total working hours (female)								
Part-time/casual labourer								
[insert contractor name]								
Total working hours (permanent)								
Total working hours (male)								
Total working hours (female)								
Part-time labourer								
[insert contractor name]								

FORM E - Worker Grievances

Project name:								
Form E – Worker Grievances (all contractors)								
Weeks	1	2	3	4	5	6	7	X
Number of Employee Grievances **submitted**	0							
Number of Employee Grievances **resolved**	0							
Number of Disciplinary procedures/actions	0							
Staff turnover: Hire / Leavers	0							

7.3 Stakeholder reporting

The Project Company will provide an annual report to stakeholders summarising key information about the Project and its performance. In addition, the Project Company will provide periodic updates and notifications via communication methods identified in the SEP for essential E&S information.

8 Document management

Control of E&S and labour-related documentation will be following the document management procedure in the ESMS. Up-to-date records will be maintained and retained for at least three (3) years or as stipulated under Uzbek law.

A comprehensive photographic archive of the Project will be maintained before and during construction. The Contractor will maintain a complete and up-to-date E&S file of all relevant sources of information. The information in the E&S file will be available to the Project Company at any time and handed over to the Project Company upon completion of the construction works. The E&S file will include, *among other things*:

- The current version of the Project Company CESMP (including Policies and thematic sub-plans) Contractor CESMP and all related procedures;
- Organogram and definition of roles and responsibilities;
- The latest version of the Project schedule;
- Site layout plans and constraints map;
- Any land-related documentation;
- Copy of the EIA/ESIA and supporting documentation
- Copy of the SEP;
- Legal Register – detailing all relevant regulations, international guidelines, and codes of practice;
- Permits Register - detailing all environmental permits and consents and licences (including waste disposal licences);
- Job Hazard Analysis sheets;
- Training Matrix;
- Environmental training records (e.g., induction training records, toolbox talk records);
- Worker's grievance log;

- Incident reports;
- Corrective Action Plan;
- Records for environmental monitoring (daily and monthly inspection forms);
- Minutes of HSE meetings;
- Current calibration certificates for all the equipment that requires calibration by an external third party;
- Copies of MSDS;
- Labour-related information (sub-contractor contracts, training records etc.);
- Site closure and rehabilitation work program; and
- Design plans for closing out the construction works.
- In addition, the Project Company will maintain the following records on-site:
- Copy of Project Company's ESMS, policies, CESMP, and specific action plans;
- Copy of the EIA and supporting documentation (Social and Biodiversity baseline studies);
- Copy of the SEP;
- Copy of RAP;
- Stakeholder consultation log;
- Community grievance log;
- Records for environmental audits and monitoring (inspection forms) and audits;
- Corrective Action Plan;
- Project Company Training records;
- Correspondence concerning environmental matters/permits, including internal and external, and
- Record of required KPIs and related statistics.

9 Management Review

Project Company will work with the Project Company and Contractor to identify ways of optimizing the facility's design to minimise project HSESS impacts, risks and hazards. Through the implementation of the Project, the Contractor must continue to find and implement ways to reduce impacts and deliver positive outcomes through each stage of the Project. The results of site inspections, audits and incident reports must be used to drive continuous improvement by the Contractor and updates to these plans.