DUNAREA EAST WIND FARM

Environmental and Social Management Plan (ESMP)

Midmar Callatis S.R.L.

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Applicable contract(s) governing the provision of this Report:

Objective:

Objective of the report is to provide the ESMP of the Dunarea East Wind Farm.

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ACRONYMS

Acronym	Meaning
ATS	Action Tracking System
C-ESMP	Contractor Environmental and Social Management Plan
CLO	Community Liaison Officer
CMP	Contractor Management Plan
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EPC	Engineering, Procurement and Construction (Contractor)
ESHS	Environmental, Social, Health and Safety
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMR	Environmental and Social Monitoring Report
ESMS	Environmental and Social Management System
EU	European Union
GD	Government Decision
GE	General Electric
GEO / OUG	Government Emergency Ordinance
H&S	Health and Safety
HR	Human Resources
HSE	Health, Safety and Environment
IESC	International Environmental and Social Consultant
IFC	International Finance Corporation

Acronym	Meaning
ILO	International Labour Organization
ISO	International Organization for Standardization
ISO 14001	International Standard for Environmental Management Systems
ISO 45001	International Standard for Occupational Health and Safety Management Systems
KPIs / KPI	Key Performance Indicators
kV	Kilovolt
MW	Megawatt
NCR	Non-Conformity Report
OECD	Organisation for Economic Co-operation and Development
OHS	Occupational Health and Safety
OM / MO	Ministerial Order
PPE	Personal Protective Equipment
PRs	Performance Requirements
PSs	Performance Standards
PUZ	Zonal Urban Plan (Plan Urbanistic Zonal)
PV	Photovoltaic
ROW	Right of Way
SA	Societate pe Acțiuni (Joint Stock Company)
SEA	Strategic Environmental Assessment
SEN	National Energy System
SEP	Stakeholder Engagement Plan
TOR	Terms of Reference
UN	United Nations
UNFCCC	United Nations Framework Convention on Climate Change
WB	World Bank

1 INTRODUCTION

1.1 Purpose

The Dunarea Wind Farm Project is one of Romania's largest onshore renewable energy initiatives. Originally conceived as a single integrated project with a total capacity of 600 MW, it is located in Constanța County, southeast Romania. The Project is jointly implemented by Consenswind and Midmar Callatis, with support from Rezolv Energy (hereafter "Project Sponsor/Owner"), a UK-based project sponsor.

Initially referred to as the "Adamdel" project, it was later renamed Dunarea Wind Farm and subsequently divided into two technically and geographically distinct components:

- Dunarea East Wind Farm, located in Deleni Commune (Project Company: Midmar Callatis, hereafter "the Project Company"), and
- Dunarea West Wind Farm, located in Adamclisi Commune (Company: Consenswind).

While the two sub-projects share a common connection point to Romania's National Energy System (SEN), they were developed as standalone projects from the outset, in line with national permitting requirements based on territorial-administrative boundaries. This document focuses exclusively on Dunarea East Wind Farm (hereafter "the Project"), which is at a ready-to-build stage. In this regard, the Project Company is Midmar Callatis S.A., while Rezolv Energy, acts as the Project Owner/Sponsor.

Environmental and Social Impact Assessment (ESIA) has been prepared for the Project, in line with the environmental and social policies of international lenders, including adherence to the IFC Performance Standards (2012) and EBRD Performance Requirements (2019). The international ESIA process was initiated in 2023 by ERM and subsequently resumed and completed in 2025 by DNV Italy S.r.l (hereafter "DNV" or "International Environmental and Social Consultant - IESC"), focusing specifically on Dunarea East Wind Farm.

This report defines the Environmental and Social Management Plan (ESMP) for managing the environmental and social aspects of the Project.

The purpose of this ESMP is to:

- Provide an overview of the environmental and social policies, regulations and standards applicable to the Project to all project staff, including contractors;
- Document and direct the Project Owner's personnel and guide the Engineering, Procurement and Construction (EPC) Contractor for the Project on how Project Environmental, Social and Health & Safety (ESHS) risks are managed during the construction stage of the Project to conform with applicable policies, regulations and standards and ensure the Project commitments are attained. This includes:
    - (i) establishing measures to be applied,
    - (ii) communicating requirements to project staff, including contractors, and
    - (iii) oversight of requirements implementation, as detailed further in this ESMP;
- Clarify ESHS compliance assurance roles and responsibilities during the construction stage of the Project;
- Ensure that adequate processes are in place to appropriately monitor construction activities against Project ESHS policies, regulations and standards;

- Ensure reporting systems are developed and implemented to communicate ESHS compliance performance to Project Owner's leadership and further to all project staff, including contractors; and
- Facilitate continual improvement and ESHS compliance assurance.

This ESMP details the ESHS management processes associated with the construction and commissioning stages of the Project. This ESMP and associated management plans will be revised to accommodate any new mitigation required and reflect lessons learned from the ESHS monitoring.

The ESMP will be subsequently updated and revised as appropriate for the operational stage of the Project to reflect the different ESHS risks at that stage and any lessons-learned to date – referred to as the Operation-ESMP. The Operation-ESMP, along with supporting operational management plans, will be drafted during the end of the construction stage and disclosed not later than two months before the start of commercial operations. While primarily focused on construction and commissioning, this ESMP also incorporates selected mitigation and management measures relevant to the transition into operations, to ensure continuity and alignment with future operational requirements.

This ESMP provides an overview of the processes to identify, avoid, mitigate, and manage Project ESHS risks during construction. The ESMP is the central document of the Project ESHS management system and is supported by a series of subordinated ESHS management plans and procedures implemented at Company and Contractor levels:

- Project Owner Level ESHS Management Plans – see Figure 2-1 in section 2 for an overview of the various management plans. These plans lay out the processes implemented by Midmar Callatis SA to ensure Project policies, standards and commitments are attained during the construction stage of the Project and guide the EPC Contractor on the requirements and management plans to be implemented for the Project as part of their ESHS management system.
- Contractor Level ESHS Management Plans referred to in this ESMP as Contractor Management Plans (CMP) – see section 2.5 for an overview of the ESHS management plans to be put in place by the EPC Contractor to ensure implementation of the Project policies, standards and commitments during own Project construction activities.

1.2 Project ESHS Risk Management Approach

The management of the Project's ESHS risks will follow a structured hierarchy of documents:

1. Project ESMP and Project Owner–Level Management Plans: these documents define the overarching requirements, performance objectives and policies for the Project.
2. Contractor Level ESHS Management Plans (developed by the EPC): the EPC Contractor must prepare a complete set of Contractor Level ESHS Management Plans based on and consistent with the Project ESMP and the Project Owner–Level Management Plans. These plans, together with all associated method statements, must be submitted to the Project Owner for approval.
3. Subcontractor ESHS Plans: the EPC must ensure that all subcontractors and service providers develop and implement ESHS procedures consistent with the approved Contractor Level ESHS Management Plans.

Implementation responsibilities can be summarized as follows:

- EPC Contractor: develops the Contractor Level ESHS Management Plans and method statements, implements and enforces these plans across all EPC activities and across all subcontractors, and conducts periodic internal monitoring of implementation and reports findings to the Project Owner.
- Project Owner: reviews and approves the Contractor Level ESHS Management Plans and conducts its own independent monitoring of EPC performance and reports findings to Lenders.
- Lenders / Independent Advisors: carry out independent audits of the Project's ESHS performance in accordance with lender requirements.

This cascade ensures that the Project ESMP and Owner-Level requirements are systematically translated into actionable Contractor procedures, and that ESHS performance is monitored at multiple levels throughout the Project lifecycle.

1.3 Project Description

The Dunărea East Wind Farm is located in the extra-urban area of Deleni Commune, within Constanța County, southeastern Romania (Figure 1-1). The project area lies entirely outside built-up zones, encompassing predominantly agricultural land, pastures, and farm roads, as defined in Urban Planning Certificate No. 50/02.03.2022.

The wind farm will consist of 45 wind turbines, each with a nominal capacity of 6 to 7 MW (depending on the choice of the supplier), for a total installed capacity of up to 315 MW. Permanent infrastructure includes internal access roads, a 33 kV/400 kV substation, underground and overhead electrical lines, and connections to the National Energy System (SEN).

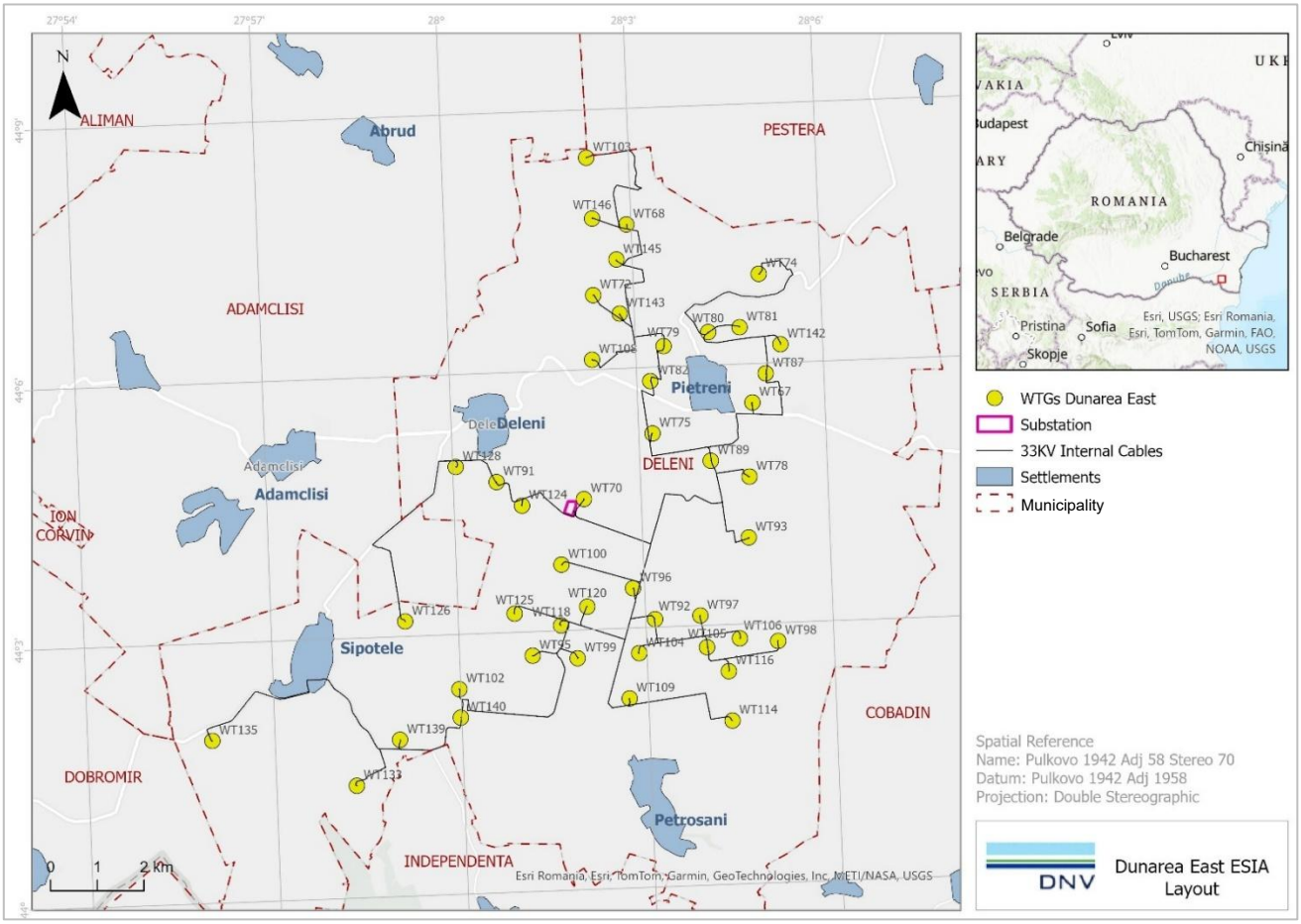

Figure 1-1 Project Layout

At the time of this assessment, the specific turbine model has not been finalized; however, four (4) potential models are under consideration:

four (4) potential turbine models are under consideration:

- Vestas V162 EnVentus with a hub height of 125 m and a rotor diameter of 162 m;
- Goldwind GW165-6.0MW with a 121 m hub height and a rotor diameter of 165 m;
- Nordex N163-7.0MW with a max hub height of 124.5 m and a rotor diameter of 163 m;
- GE Vernova GE164-6.0MW with a maximum hub height of 128 m in some locations and 112 m for other locations where 128m exceeds the aviation threshold and a rotor diameter of 164 m.

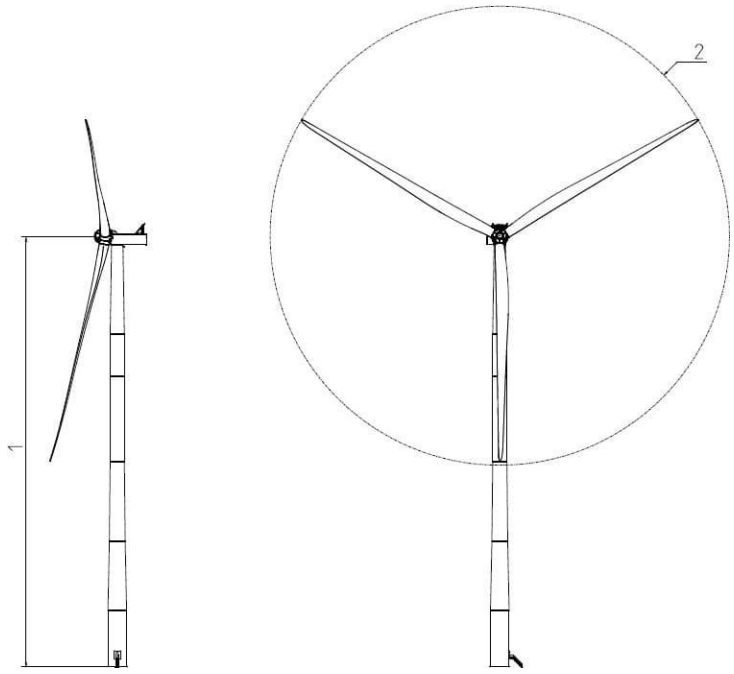

Figure 1-2 Dimensions of the proposed wind turbine

1. *Hub height – 121 - 128 m*
2. *Diameter – 162 - 165 m*

2 DUNAREA EAST WIND FARM ESHS MANAGEMENT SYSTEM

2.1 Project Owner's Management System Concept

The Project ESHS Management System described in this section refers to the project-specific framework for managing ESHS risks and commitments during construction and commissioning. It does not replace or replicate the corporate ESMS of the Project Owner but outlines the project-level processes, tools, and responsibilities through which ESHS requirements are implemented.

The Project ESHS Management System is based on a four-step iterative process aligned with the Plan-Do-Check-Act model, as represented in Figure 2-1 overleaf. The concept reflects an adaptive management loop that accommodates changes that occur as the Project moves through the various implementation stages.

All of the main activities corresponding to the above four components of the Project ESHS management system are described in the following sections of this ESMP (to facilitate reader orientation, the respective stage of [PLAN], [DO], [CHECK], [ACT] is indicated at the subsection headings).

The Plan-Do-Check-Act model was transposed in the Project's ESHS Management System following a staged approach, organized in three levels (from A to C), as represented in Figure 2-1.

This process is initiated with the identification of the applicable requirements, regulations and standards and the definition of the principles and leadership commitments stated in the Midmar Callatis SA Code of Conduct & Business Ethics and ESHS Policies. Subsequently, the Project's ESHS risks and impacts were identified and assessed based on the ESIA performed for the Project. The ESIA identified the embedded ESHS controls and defined the mitigation measures required to address the residual ESHS impacts and ensure that the Project requirements, regulations and standards are met. Addressing the ESHS risks and impacts represents a Project commitment, specifically a commitment by the Project Owner to ensure that these measures will be implemented during the Project execution – either by the Project Owner themselves or via the EPC or other parties.

The ESHS mitigation measures that resulted from the ESIA process were transposed into a Commitments Register, serving as a tool which informs this ESMP and the subordinated ESHS management planning and processes to be implemented at the various levels of the Project organization.

This ESMP is a critical component of the Project ESHS risk management system, providing an overview of the processes and tools to manage Project ESHS risks within the frame of the Plan-Do-Check-Act model. The ESMP also sets the requirements for the management planning (operational controls, performance review and evaluation) to be established and maintained by the Project Owner and the EPC Contractors.

The relationship between the ESMP, Project requirements, regulations, standards (see section 2.2), and the management plans at various levels of the Project ESHS Management System is illustrated overleaf. Table 2-1 provides an overview of the Project ESHS management planning structure, listing the policies, forms, project-specific plans, and other documentation anticipated for the Project. At this stage, the documents are planned and will be developed during the design, construction, and commissioning phases.

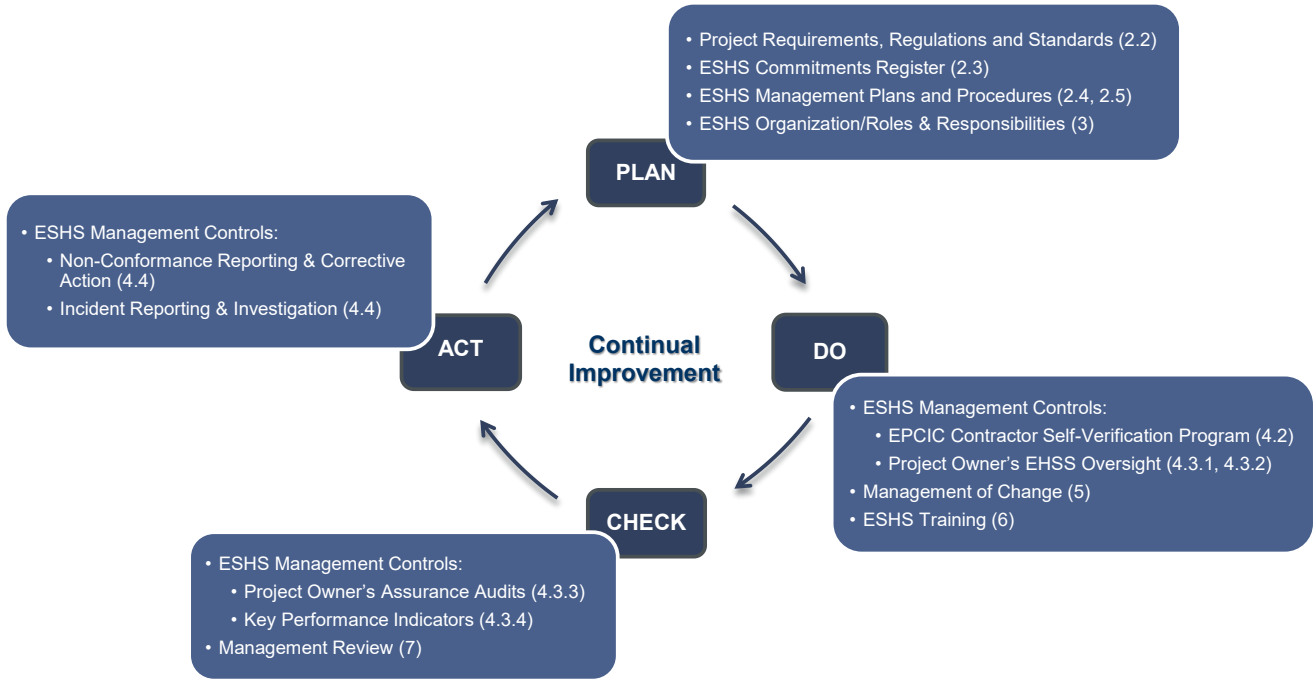

Figure 2-1 Project ESHS Management System Process

Table 2-1 Project ESHS Management Planning Structure

Project Policies	ESMS Management Program and Forms	Project Specific Plan	Project Documentation
• Environment and Social Policy • Health, Safety and Security Policy • Labour Commitment Policy • Local Content Policy • Code of conduct - workers • Code of conduct - security • Accommodation Management Policy	• Legislation register • Permit matrix • Conditions matrix • Inspection and audit plan • Training matrix • Monitoring matrix • Monthly E&S reporting (construction) • Incident reporting form • Corrective Action Plan (template)	• Construction ESMP • Corporate Social Responsibility Plan • Pollution Prevention and Control Plan (including noise, dust, hazardous materials, effluent wastewater) • Biodiversity Management and Monitoring Plan • Biodiversity Action Plan • Habitat Restoration Plan • Invasive Species Management Plan • Waste Management Plan	• TOR for E&S roles • Project Schedule • Owner E&S Schedule of obligations for Contractors

Project Policies	ESMS Management Program and Forms	Project Specific Plan	Project Documentation
	• Register of project documentation • Contractor evaluation form • Register of land needs • Monthly E&S reporting operation • Community grievance form • Community grievance log • External consultation Log • Register of impacts and mitigation	• Labour Management Plan • Chance finds procedure • Stakeholder Engagement Plan • Occupational Health and Safety Plan • Community Health and Safety Plan • Traffic Management Plan • Emergency Preparedness and Response Plan • Contractor Management Plan • Livelihood Restoration Plan • Security Management Plan	

2.2 Project Requirements, Regulations and Standards [PLAN]

Midmar Callatis SA and its EPC Contractors are required to meet a number of key ESHS requirements, regulations and standards as outlined below. This ESMP is intended to support the transposition of these standards into Project implementation.

2.2.1 Project Owner's Code of Conduct and Policies

Midmar Callatis SA will develop a set of overarching ESHS company policies, as listed below, and has committed to implementing these on the Project to guide and ensure conformance to the Project Requirements, Regulations and Standards. These apply to all activities related to the Project, including the construction works program and all staff working on the Project:

- Project Environment and Social Policy
- Project Health, Safety and Security Policy
- Project Labour Commitment Policy
- Project Local Content Policy
- Project Code of conduct - workers
- Project Code of conduct - security
- Worker Accommodation Policy

These policies establish the framework for the Project's environmental, social, health and safety management processes as further developed and defined within this ESMP.

Other relevant Project Owner (Corporate) Policies

- Anti-bribery and corruption policy
- Code of conduct and ethics
- Contracts and Procurement Policy
- Cyber Security Policy
- Equal Opportunity and Discrimination Policy
- Health and Safety Policy for Outside the workplace and Site Visits
- Corporate Health and Safety Policy
- Personal data and Processing Policy
- Speak up Policy
- Supplier Code of Conduct

2.2.2 National Legislation and Permitting

Appendix A summarises key environmental legislation documents applicable to the Project.

The Project Owner and its EPC Contractor will comply with all national laws, regulations and codes of practice requirements and fulfil all applicable regulatory requirements.

To ensure this, the Project Owner will maintain a Legal Register and Permit and Conditions Register throughout the project life cycle to consolidate all applicable environmental and social compliance obligations for the Project.

The EPC Contractor will set up a process for tracking and implementing any relevant regulatory changes and requirements updates for their activity.

The Permit Register constitutes an integral part of the EPC Contract. The up-to-date version of the register (updated as changes occur) is available at all times for both the Project Owner and the EPC Contractor though the document sharing and communication platform established for the Project.

2.2.3 EU and International Legislation

2.2.3.1 International Conventions and Protocols

International conventions ratified by Romania and relevant to the Project. include the following:

- The Kyoto Protocol on Climate Change (UNFCC): Romania became a signatory to the UNFCC in 1998 with a full ascension in 2002.
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal (12/22/1995)
- Convention on Biodiversity of United Nations (Romania became part in 1994)
- International Union for Conservation of Natural Resources Red List of Threatened Species

Additional details on the above-indicated international conventions and protocols are provided in Appendix A.

2.2.3.2 International Environmental and Social Policies and Standards

- IFC Performance Standards (2012);
- EBRD Environmental and Social Policy and Performance Requirements (2020)
- OECD Common Approaches
- UN Voluntary Principles on Security and Human Rights;
- International Labor Organization (ILO) Conventions;
- Applicable requirements listed in IFC's/WB General Environmental, Health, and Safety (EHS) Guidelines, relevant IFC industry specific EHS Guidelines including but not limited to:
    - IFC/WB Environmental, Health, and Safety General Guidelines (2007);
    - IFC/WB Environmental, Health, and Safety Guidelines for Wind Energy (2015);
    - IFC/WB Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution (2007);
    - IFC/EBRD Guidelines for workers accommodations (2009);
    - IFC Good Practice Note on Non-Discrimination and Equal Opportunity;
    - IFC Good Practice Note – Managing Retrenchment;
    - IFC Handbook – ESMS Implementation;
    - IFC Stakeholder Engagement- Good Practice Handbook for Companies Doing Business in Emerging Countries;
    - IFC Good Practice Note – Addressing Grievances from Project-Affected Communities;
    - IFC Good Practice Manual – Doing Better Business Through Effective Public Consultation and Disclosure;
    - IFC Handbook for Labour and Working Conditions - Measure & Improve Your Labour Standards Performance;
    - IFC Guide to Health Impact Assessment (2009);
    - WB Guidance Note on Managing the Risks of Adverse Impacts on Communities from Temporary Project Induced Labor Influx (2006);
    - IFC Good Practice Handbook to Cumulative Impact Assessment and Management: Guidance for the Private Sector in Emerging Markets (2013);
    - IFC/WB Environmental, Health, and Safety Guidelines for Construction Materials Extraction (2007);
    - IFC/WB Environmental, Health, and Safety Guidelines for Water and Sanitation (2007);
    - IFC Good Practice Note Managing Contractors' Environmental and Social Performance (2017).

The applicable version of these documents, including relevant appendices and supplements, is the latest revision published at the time of writing this document.

2.3 ESHS Commitments Register

Upon completion of the ESIA process, the mitigation measures addressing the project's potential impacts as defined in the ESIA package were transferred into an ESHS Commitments Register (the Commitments Register) (Appendix B).

The ESHS Commitments Register consolidates the applicable ESHS mitigation measures defined in the ESIA package as actionable measures, management and monitoring activities for implementation during Project execution stages.

The ESHS Commitments Register was developed in an easily understandable format, allowing it to be used as a tool by the Project ESHS staff during Project execution. For ease of use and implementation, the Commitments Register is organized to provide for each commitment indication on:

- the Project stage (i.e. construction and operation) the respective commitment applies to,
- responsibility for implementation (i.e. Project Owner or EPC or both),
- Project location/site the respective commitment applies to, and
- the Project Owner's and EPC management plan ensuring implementation of the commitment.

In turn, the Commitments Register informs the Project Owner and the EPC Contractors' Management Plans, which detail the resources and processes to be implemented to ensure the implementation of the commitments.

A printout of the Commitments Register represents an integral part of this ESMP and is provided in Appendix B of this document. The ESHS Commitments Register includes, in the case of each item, indication of the management plan(s) ensuring the implementation of the respective commitment.

2.4 Project Owner–level ESHS management plans [PLAN]

The Project Owner is overall responsible for implementing the Project ESHS mitigation measures. To ensure this, several topic-specific ESHS Management Sub-Plans will be produced to facilitate the implementation of Project commitments, requirements, regulations and standards.

The Project Owner-level Construction Phase Management Plans are the following (note that at this stage, the documents are planned and will be developed before construction):

- Construction ESMP
- Corporate social responsibility Plan
- Subcontractor Management CMP
- Pollution Prevention and Control Plan (including noise, dust, hazardous materials, effluent wastewater)
- Topsoil Management and Site Reinstatement CMP
- Biodiversity Management and Monitoring Plan
- Biodiversity Action Plan
- Invasive Species Management Plan

- Waste Management Plan
- Labour Management Plan
- Chance finds procedure
- Stakeholder Engagement Plan
- Occupational Health and Safety Plan
- Community Health and Safety Plan
- Traffic Management Plan
- Emergency Preparedness and Response Plan
- Contractor Management Plan
- Livelihoods Restoration Plan
- Habitat Restoration Plan
- Security Management Plan

Supporting forms and templates developed as part of the project ESMS for implementation of the ESMP and supporting management plan requirements are as follows:

- Legislation register
- Permit matrix
- Conditions matrix
- Inspection and audit plan
- Training matrix
- Monitoring matrix
- Monthly E&S reporting
- Incident reporting form
- Corrective Action Plan (template)
- Register of project documentation
- Contractor evaluation form
- Register of land needs
- Monthly E&S reporting operation
- Community grievance form
- Community grievance Log
- External consultation Log

The Project ESHS Management Sub-Plans detail the management and implementation processes required to achieve commitments, requirements, regulations and standards. The main roles of the Project ESHS Management Plans are to:

- Define the processes in place to ensure that the Project Owner as an organization implements the Project commitments, requirements, regulations, and standards under their direct responsibility.
- Define the compliance and assurance processes, ensuring that the work planned and performed is conducted according to the Project ESHS commitments, requirements, regulations and standards.
- Ensure that the Project Owner implements ESHS oversight of the EPC Contractors to measure the effectiveness of their self-verification processes with ESHS commitments, requirements, regulations and standards.
- Define and communicate to the EPC Contractors the requirements regarding the specific management procedures they must implement during Project execution.

The Project Management Sub-Plans will be structured to include but not be limited to the topics in the following table.

Table 2-2 Project Owner-level Construction ESHS Management Plans

Project ESHS Management Plan	Aspects covered

Pollution Prevention and Control Plan	• General pollution prevention and protection measures
	• Pollution prevention and protection measures at hazardous materials storages, such as bunding storage areas, tank overfilling prevention measures, etc.
	• Spill prevention containment measures around sensitive equipment, installation of appropriate spill clean-up equipment and development of response procedures
	• Measures at source to prevent pollutants from entering the pathway
	• Actions to be followed in case pollutants enter the pathway
	• Management of spill-contaminated soil
	• Wastewater discharge and management
	• Construction dust mitigation and air quality monitoring
	• Noise management,
	  ○ Noise abatement/mitigation measures
	  ○ Noise monitoring
	• Hazardous materials storage and handling
	• Maintenance of construction machinery and vehicles to minimize emissions, leaks, and excessive noise generation, including routine inspections and compliance with required performance standards.
	• Implementation of soil protection and erosion control measures.

Biodiversity Management Plan	• Plan for implementing mitigation measures identified in the ESIA related to the Project's impact on biodiversity. • Mitigation strategy (how the mitigation hierarchy has been followed) • Requirements for pre-construction check surveys

Project ESHS Management Plan	Aspects covered
	• Management and monitoring measures during the construction phase of the project • Roles and responsibilities • Measures to avoid the introduction and/or spreading of invasive alien species

Waste Management Plan	• Non-hazardous and hazardous waste management, including:
	  ○ Waste hierarchy implementation (i.e. reduction at source, reuse, recycling, energy recovery, responsible disposal);
	  ○ Identification and classification of wastes;
	  ○ Waste register;
	  ○ Waste handling (i.e. collection, segregation and containers, storage, treatment, transport and documentation, disposal);
	  ○ Waste duty of care process (waste transfer, waste consignment provisions);
	  ○ Monitoring and reporting.

Labour Management Plan	• Training and skill development activities; • Employee grievance mechanism; • Camp and worker accommodation management aspects • Measures for fair treatment, non-discrimination, and equal opportunity in employment. • Requirements related to the provision of safe and healthy working conditions and the health of workers • Management of potential communicable diseases associated with the construction workforce. • Behavioural code of conduct for workers when outside of work and interaction with the local community • Contractor employment practices conformance, reporting and monitoring • Management measures related to child labour, forced labour, and third-party workers.
Chance finds procedure	• Chance finds procedure • Chance finds training, management and response • Interface and coordination with relevant authorities
Stakeholder Engagement Plan (including external grievance mechanism)	• Stakeholder identification and mapping • Stakeholder analysis • Previous engagement activities • Stakeholder engagement plan and record-keeping • Grievance mechanism • Monitoring and evaluation

Project ESHS Management Plan	Aspects covered
	• Internal and external reporting • Roles and responsibilities
Occupational Health and Safety Management Plan	• Safety principles and philosophy • H&S policies and commitments • Project H&S objectives • H&S management system structure • H&S leadership, organization, competence, communication • Contractors H&S management • PPE requirements and enforcement • Non-conformances and incident reporting, investigation and lessons learned • H&S audit & review • H&S performance monitoring/ improvement • H&S records and documents control

Community Health, Safety and Security Management Plan	• Security arrangements roles and responsibilities
	• Site access (project personnel identification, visitors identification, vehicles identification etc.)
	• Security-related communication arrangements
	• Interface with host government agencies and public security forces
	• Provisions to ensure compliance with regulations and good industry practice regarding:
	  ○ Security personnel selection and employment
	  ○ Security personnel rules of conduct,
	  ○ Security personnel training, equipment
	  ○ Monitoring of compliance and investigation process of non-compliance acts
	• Security training program including:
	  ○ Code of Conduct modules specific to security personnel
	  ○ Voluntary Principles on Security and Human Rights
	• Grievance mechanism
	• Operational noise management measures to minimise disturbance to nearby communities, including turbine noise monitoring, use of noise-reduction operational controls, and procedures for addressing community noise complaints.

Traffic Management Plan	General management plan defining common control measures, standards and procedures for construction traffic management aimed at guiding contractors on applicable construction traffic planning and management requirements.

Project ESHS Management Plan	Aspects covered
	• Site access and haulage routes (for general and over-dimensioned vehicles) • Road traffic management including on-site and off-site/public roads speed limits, vehicle inspection requirements, operating rules and procedures • Dust, air emissions, noise abatement requirements and measures • Access roads management • Road-related accidents prevention • Local traffic signage • Timing of deliveries • Road's closure • Road's cleaning • Abnormal load road safety and management requirements • Communication in advance of heavy and abnormal load construction traffic through communities • Training of drivers and equipment operators • Community awareness program on traffic-related risks, in line with SEP provisions • Monitoring system • Internal monitoring and reporting • Contractor traffic and transportation management planning requirements • Operational requirements to ensure that construction vehicles are used efficiently and safely, including avoidance of unnecessary idling, adherence to speed limits, and minimization of noise and emissions during movements.
Emergency Preparedness and Response Plan	Provision of a consistent and systematic approach to ensure effective control and management of emergencies that may be encountered during project development on project sites. • roles and responsibilities, chain-of-command and communication framework • decisional workflow in case of emergency • different emergency tiers response teams: • notification procedure • potential emergency scenarios and their management • media and public relations during emergency • training and drills requirements • emergency contact details
Contractor Management Plan	• Subcontractor pre-qualification criteria • Subcontractor onboarding requirements

Project ESHS Management Plan	Aspects covered
	• Define the approach to managing the E&S performance of contractors, subcontractors, and other third parties during the various phases of the project. • Program for audit of E&S performance of EPC contractors and subcontractors, specifying the frequency of audit (at least monthly during the construction phase), reporting and roles and responsibilities
Livelihoods Restoration Framework	• Livelihood restoration principles and activities • Eligibility and entitlements • Planning and implementation • Monitoring and evaluation • Accidental damages compensation process for future unforeseen impacts.

2.5 Contractor-level ESHS Management Plans [PLAN]

EPC Contractor is responsible for the implementation of the ESHS mitigation associated with the execution of the Project construction activities.

To ensure this, the EPC Contractor is required to define and implement their own ESHS compliance monitoring and assurance processes for the Project. These will be outlined in EPC Environmental and Social Management Plan (EPC-ESHS PLAN) and topic-specific Contractor Management Plans (CMP).

For the purpose of this ESMP, the term “Construction Management Plans (CMPs)” is used as a generic term to refer to the set of management plans, procedures and method statements developed and implemented by the EPC Contractor to address specific ESHS impacts associated with construction activities, in line with this ESMP and the Project Owner-level ESHS Management Plans.

The EPC Contractor shall ensure that all requirements set out in the Project-level ESHS Management Plans, relevant to EPC and subcontractor activities, are appropriately transposed and detailed within the EPC-ESHS Plan and associated CMPs.

The CMPs shall be compliant with the ESIA documentation package, the Commitments Register, the Project Requirements Regulations and Standards referred to in section 2.2 of this ESMP including national and EU regulations, EBRD ESRs and IFC PSs.

The Project Owner will review and approve the EPC-ESHS PLAN and the CMPs in line with the Project documents approval process. No construction work is allowed to be performed by the EPC or its subcontractors until the EPC-ESHS Plan and CMPs are pre-approved by the Project Owner, in line with the Project’s formal documents approval process.

2.5.1 EPC Contractor ESHS Plan (EPC-ESHS Plan)

The EPC-ESHS Plan is the operational control document defining EPC Contractor’s self-verification and assurance processes to ensure the Project ESHS commitments are implemented at site level.

The EPC-ESHS Plan will detail the roles and responsibilities, the self-verification and assurance processes put in place at the EPC organization level to ensure the requirements of this Project ESMP and the ESHS Commitments are met. This will

include all aspects related to staffing, roles and responsibilities, resources, self-verification and assurance processes, communication, and management of non-conformances.

The EPC-ESHS Plan will be structured to provide, as minimum, the information in the following table.

Table 2-3 EPC-ESHS Plan content

EPC-HSE Plan Suggested Sections	EPC-ESHS Plan Required Content
Introduction	• Purpose & objective • Reference to EPC ESHS Policies and Procedures • Applicable ESHS Requirements, Regulations and Standards
Project ESHS Management	• EPC Project ESHS management concept • EPC ESHS Project management documents (EPC-ESHS Plan, CMPs, Subcontractor Method Statements, ESHS requirements etc.)
Project Organization	• Overall EPC ESHS Project Organization • EPC ESHS Staffing, Roles and Responsibilities
ESHS Management Controls	• EPC ESHS Self-verification (daily/weekly etc., oversight inspections of own and subcontractor activities, joint inspections with Project Owner, monitoring etc.) • EPC ESHS Assurance (internal and external audits, management review etc.) • Action Tracking System (system for recording and monitoring of ESHS corrective actions/measures until closure) • Non-conformity Notification, Recording and Corrective Action (ESHS NCR system) • ESHS Incident Reporting and Investigation • ESHS Monitoring Program • ESHS Reporting (daily, weekly, monthly, KPI reporting etc.) • ESHS Documentation Management (ESHS records management)
Subcontractors Management	• Roles & responsibilities • Subcontractor ESHS management planning/method statement requirements • Subcontractor requirements for ESHS self-monitoring and reporting to EPC
Communication Arrangements	• Internal Project communication arrangements (EPC – Project Owner communication) • External communication (communication with authorities, external Project stakeholders, etc.) • Emergency communication arrangements
ESHS Training Program	• Types of ESHS training • Training planning, delivery and tracking
Change Management[1]	• ESHS Change Management Process (interfaces with overall Project Change Management process)

[1] A process for requesting, determining feasibility, planning, implementing, and evaluating Project changes.

EPC-HSE Plan Suggested Sections	EPC-ESHS Plan Required Content
	• ESHS assessment of Project/Design changes.

The structure provided in the table above is a suggestion only. While the EPC may alter the structure of the HSE Plan as needed to align with its management system requirements, the above-indicated content is to be included as a minimum and in a user-friendly and fit-for-purpose format.

2.5.2 EPC Contractor Human Resources Policy

The EPC Contractor will also provide overarching human resources (HR) policies demonstrating compliance with legal and other requirements stipulated in this ESMP (e.g. IFC PS2). The policy will include detailed information on workforce induction, information on rights, child and forced labour, equal opportunity, migrant workers, promotion of local employment opportunities, labour unions, worker accommodation requirements, provision for retrenchment plans, security personnel, influx management etc. The EPC Contractor will ensure that core labour requirements align with legislation and other requirements and are cascaded down to contracting chains to all subcontractors and suppliers of core materials. The EPC Contractor must be able to evidence this transfer of responsibilities down the contracting chain. Each sub-contractor must demonstrate an HR Policy aligned with the EPC HR Policy.

2.5.3 EPC Contractor Construction Management Plans (CMP)

To ensure consistency and clarity across Project documentation, a standardised nomenclature has been adopted for ESHSS management plans. Project-level documents are defined as “Management Plans”, while EPC Contractor deliverables are referred to as “Construction Management Plans (CMPs)”, covering the same subject areas at implementation level.

The CMPs required to be put in place by the EPC Contractor will generally mirror the topics addressed in the Management Plans set at Project owner level. However, the CMPs are required to present further site-specific implementation details, i.e., how the EPC Contractor and its subcontractors will implement the requirements outlined in the corresponding Project-level Management Plans and in the EPC Contract.

To allow flexibility to the EPC Contractor in defining procedures in line with its own management system, the mitigation measures addressing the specific ESHS impacts may be implemented through Management Plans, Procedures and Method Statements (collectively referred to herein as CMPs), as deemed appropriate by the EPC Contractor. Notwithstanding this flexibility, the EPC Contractor shall ensure that CMPs addressing, as a minimum, the below-indicated specific topics are developed and implemented throughout the Project execution:

- Pollution Prevention and Control CMP (including, among others, air, noise, water supply and wastewater, hazardous materials management, etc.)
- Biodiversity Management and Monitoring CMP
- Topsoil Management and Site Reinstatement CMP
- Waste CMP
- Chance Finds Procedure (pertaining to earthworks operations).
- Labour CMP (including employment, working conditions and worker accommodation aspects)

- Traffic CMP
- Occupational Health and Safety CMP and associated procedures
- Emergency Preparedness and Response CMP
- Contractor Management CMP (for management of EPC second and third-tier subcontractors and subcontractor management of their subcontractors)

Certain Project-level Management Plans, such as the Stakeholder Engagement Plan and Livelihood Restoration Plan, are implemented at Project Owner level and are not required to be replicated as standalone CMPs. However, the EPC Contractor shall comply with and support the implementation of the relevant requirements, as applicable.

In defining the mitigation and management measures to be included in the above CMPs, the EPC Contractor shall use as key reference documents, the present ESMP, provisions of the Project ESIA and the Commitments Register provided in Appendix B to this ESMP.

Project stakeholder engagement activities and community relationships will be managed by the Project Owner in line with the Project Stakeholder Engagement Plan. While contractors are not required to perform Project-related stakeholder engagement, the Project Owner will work with the contractors to ensure that their CSR-related activities will align with those the Project Owner envisaged, as applicable.

The EPC Contractor CMPs will be informed by the Project (Company)-level ESHS Management Plans (refer to Section 2.4 above) and shall be generally structured to provide the following information:

- Objectives of the management plan/purpose and scope,
- Reference documents (indication of other Project-level documents and EPC CMPs of relevance for the management plan; reference to relevant applicable standards);
- Identification of Project activities/operations associated with the impacts addressed by the respective CMP and triggering the implementation of all or part of the respective CMP requirements;
- Description of management practices employed to implement impact mitigation and ensure accomplishment of related commitments;
- Roles and responsibilities;
- Subcontractors' requirements (including those addressing ESHS aspects in the subcontractor method statements);
- CMP requirements implementation monitoring and reporting;
- Staff training needs.

Prior to construction, the Project Developer will ensure that all ESHS management plans are fully aligned with applicable permit conditions and contractual requirements. The ESMP will be updated as necessary to reflect any additional or revised plans identified during detailed design or EPC Contractor mobilisation.

The above list represents the minimum set of CMPs expected from the EPC Contractor. Additional plans, procedures or method statements may be developed by the EPC Contractor as required by its construction methodology, risk profile, or contractual obligations, provided that all ESMP commitments are fully addressed.

2.6 Operational ESHS Management Framework

This section provides a framework for the ESHS Management planning to be put in place for the operational stage of the Project. The ESHS Management during operation will ensure that the mitigation measures to be implemented at the operational stage as defined in the Project ESIA and all ESHS commitments applicable at the operational stage are met.

It is envisaged that for the management of the ESHS aspects associated with the operation stage, a similar approach to the management processes detailed in this ESMP will be considered for the ESHS management and performance monitoring.

It is currently envisaged that the operations-stage ESHS Management Framework will comprise the following topic-specific ESHS management aspects:

- Pollution Prevention Management Plan (including, among others, noise, spill prevention, contaminated land and hazardous materials management)
- Site Reinstatement Monitoring Plan
- Occupational H&S Management Plan
- Emergency Preparedness and Response Plan.
- Stakeholder Engagement Plan;
- Community Investment Plan.
- Livelihood Restoration plan (if ongoing obligations are applicable)

These operations-stage management plans will be based on the construction management plans, modified based on lessons learned and anticipating the activities of the operations phase. It is expected that the operation stage ESHS management planning documents will be more concise and targeted specifically at the operation of the Project.

The structure of the operational stage management plans will generally follow the requirements applicable for the construction management plans as specified in this ESMP, adapted to meet operation stage risks and issues as needed.

The above-indicated framework is indicative at this stage and will be refined at the stage of the operational readiness planning. The ESMP will therefore be updated in response to this, prior Project enters operation.

3 ESHS PROJECT ORGANISATION

3.1 ESHS management project organization

The Project Owner’s ESHS management organization chart will be defined before construction.

3.2 Project Owner’s ESHS Roles and Responsibilities [PLAN]

The Project Owner is ultimately responsible for ensuring that all Project activities comply with the Project ESHS policies, regulations and standards. The Project Owner will therefore establish an appropriate organizational structure, responsibilities, practices and will ensure the resources necessary for the ESHS management during the Project execution. Indicated staff may sit within Project Owner or may be part of the Owner’s Engineer organization.

Specific main responsibilities of key Project Owners staff are summarized in Table 3-1 below. The staff job descriptions detailing individual responsibilities will be aligned with the requirements summarized herein.

Table 3-1 Key Project Owner staff and associated responsibilities

Role	Responsibility
Project Director	• Overall accountability for the Project including delivery in line with applicable national and international standards. • Ensures allocation of sufficient resources for the ESMP and supporting sub-plan implementation including for ESHS organization, permitting, training, equipment and qualified personnel. • Ultimate responsibility for ensuring implementation of required corrective actions including in response to identified ESHS non-compliances or incidents. • Ensures periodical review of the ESMP effectiveness in line with the provisions of this plan.

ESG Manager/ Project Social Manager	• Appropriately qualified professional familiar with ESHS aspects associated with internationally financed projects implementation.
	• Performing duties both at corporate level and partially on site.
	• Performing duties both at corporate level and supporting on site CLO.
	• Provide functional support to the field staff to implement the social requirements of this ESMP and of the Project Owner's management system;
	• Coordinate the implementation of the Stakeholder Engagement Plan;
	• Provide timely information to communities on all Project works through regular meetings with stakeholders and ensure that long term relationships are not negatively impacted.
	• Provide information on potential issues with local communities and stakeholders and contribute to implementing specific measures to prevent and mitigate risks.
	• Identify key stakeholders, requiring engagement in the frame of Project stakeholder engagement processes/activities and update regularly the stakeholder mapping in response to stakeholders' activities and their relationship with the Project.
	• Monitor local developments with potential to impact Project activities, and report to the Project Manager.
	• Ensure that stakeholder engagement activities are documented and evidence (e.g. Minutes of Meetings) are kept on file.
	• Perform regular review and monitoring of SEP implementation.
	• Coordinate and manage implementation of the Project Grievance Mechanism.
	  ○ Ensure Project Grievance Committee Meetings are formally documented and recorded;
	  ○ Coordinate preparation of responses to complainants and agree content with other members of the Project Grievance Committee;
	  ○ Responsible for ensuring responses to complainants are provided in line with the Grievance Mechanism provisions
	  ○ Report to Project Management Team on grievance management.
	• Take active role in the in the identification of community needs and assist in the decision process regarding Project Owner's community investment program.
	• Responsible for the successful implementation of Project Owner's community investment program.

Role	Responsibility
	• Oversee Project external communications; • Responsible for the Project information disclosure, mass media coverage/press releases.
EHS Manager	• Oversee implementation of the Employer's Construction Management Plan (including supporting sub-plans) • Oversee implementation of Contractor ESHS Management plans and supporting documentation for use on-site • Liaise on a day to day basis with the Contractor ESHS Manager. • Daily site walkarounds • Ensure that all Contractors adhere to the ESHS policies • Monitor implementation of Contractor OHS procedure and advise Contractor (s) to drive the implementation of national and Lender standards and procedures at the site • Review and approve Contractor ESHS procedures (as requested in this document) before work commences. • Review and comment on method statements (Any "strong" comments will be subject to discussion and clarification with the EPC Contractor) • Collate, report and submit all ESHS monthly incident statistic reports as reported by Contractor • Conduct weekly inspections and monthly audits on behalf of the Employer and to ensure corrective actions are monitored and documented as required by this ESHS CMP (including worker audits an audit of CF procedures) • Confirm that all site personnel and employees are informed of site safe working procedures and practices so that they can fulfil their responsibilities. • Verify Contractor provisions for medical preparedness and facilities are readily available for all employees and that records are adequately maintained • Verify adequacy of contractor Emergency Preparedness, including appropriate training and test run scenarios and to ensure contingency plans are current. • Liaise with Site Manager to provide regular updates regarding ESHS matters • Oversee incidents investigation or near-miss events as necessary or required. Including compilation and completion of any required documentation

Role	Responsibility
	• Analyse root causes to determine safety measures to prevent future incidents and influence the implementation of corrective actions • Ensure efficient ESHS communication via ESHS Committee Meetings, attendance and sharing information from HSE meetings • Provide out of hours emergency contact service • Oversee implementation of management of known sites of cultural heritage importance.
H&S Supervisor	• Perform oversight inspections of the EPC Contractors' and subcontractors' activities to ensure they align with Project, health and safety management requirements and with the CMPs/method statements provisions pertaining to health, safety and environment. • Provide feedback on inspections findings to the EHS Manager. • Provide HSE advice and training/deliver toolbox talks to field teams. • Report on HSE compliance and corrective actions implementation to the EHS EHS Manager. • Record HSE incidents and follow up on closure by EPC. • Participate in internal and external HSE audits. • Report to the ESHS Manager on daily basis and in agreed format on all health, safety and environmental matters and activities performed.
E&S Supervisor	• Support EHS and Social Manager to oversee delivery of deliver on site EHS activities in compliance with project requirements.
Community Liaison Officer	• Acts as local liaison between the Project and the community/local stakeholders and maintains positive relationship with them. • Provide timely information to local community members on all Project works through regular meetings with stakeholders and ensure that long term relationships are not negatively impacted. • Provide information to Project management on potential issues with local communities and stakeholders and contribute to implementing specific measures to prevent and mitigate associated risks • Take active role in identification of community needs and assist in the decision process regarding the Project's community investment program. Contribute to the successful implementation of the Project's community investment program. • Identify key stakeholders, requiring engagement in the frame of the Project stakeholder engagement processes/activities and support with updating regularly the stakeholder mapping in response to stakeholders' activities and their relationship with the Project. • Monitor local community developments with potential to impact Project activities, and report to the Communications & Community Relations Manager. • Support with the Grievance Mechanism implementation at field level. Assist local community members in filing their grievances as needed. • Report on all activities performed to the Communications & Community Relations Manager on daily basis and agreed format.

3.3 EPC Contractor ESHS Roles and Responsibilities [PLAN]

It is EPC Contractor`s responsibility to ensure that ESHS compliance is achieved according to the requirements and processes defined in this ESMP. In attaining this objective, the EPC Contractor establishes and maintains through its own ESHS Management System a documented process to identify risks and impacts, implements adequate management measures to mitigate these in line with the Project Requirements, Regulations and Standards specified in section 2.2 of this ESMP. EPC Contractor ESHS monitoring of its own activities and its subcontractors ESHS performance is referred to as 'self-verification' and forms the first level of ESHS compliance monitoring under this ESMP.

The EPC Contractor is responsible for:

- Self-verification of its own compliance by maintaining a system to manage ESHS aspects and impacts in line with Project Owner's and its own management system requirements;
- Ensuring that all ESHS Non-conformances and incidents are reported and dealt with effectively and that lessons are learned;
- Ensuring their organizations have adequate resources and expertise for ESHS compliance monitoring and control to meet the ESMP requirements;
- Keeping the Project Owner fully informed of any ESHS issues;
- Recording and reporting monitoring observations, required actions and raising non-conformance reports where appropriate;
- Instructing own and subcontractors' staff in their responsibilities with respect to compliance assurance and incident reporting and response;
- Ensure facilitation of any grievances they may receive into the Project Grievance Mechanism
- Cooperating with the Project Owner in relation to ESHS compliance assurance activities;
- Participating in joint inspections, performance reviews and audits as required by the Project Owner;
- Providing Project Owner with access to monitoring records (including all relevant documentation and databases) as required;
- Ensuring adequate expertise, planning and resources are in place to appropriately identify ESHS risks sufficiently in advance of construction, in order to ensure compliance;
- Identifying ESHS risks as part of its planning processes and through implementation of appropriate mitigation measures and communicating these to its workforce;
- Reporting to the Project Owner on ESHS performance, including KPIs on weekly and monthly basis in a commonly agreed format;
- Maintaining updated registers that capture the range of compliance monitoring and assurance information necessary to demonstrate that Project ESHS standards are being met during construction works execution and reporting on this to the Project Owner.

To ensure implementation of the above, the EPC Contractor is required to structure their organization to include sufficient and adequately qualified ESHS staff. The EPC Contractor is responsible for determining the required number of ESHS personnel to ensure that Project ESHS policies, regulations and standards are met throughout works execution.

Furthermore, the EPC Contractor is responsible to ensure that their subcontractors implement throughout their Project activities the requirements set forth in this ESMP and subordinated plans. For this purpose, the EPC Contactor is required to put in place adequate, documented processes for supervision and monitoring of subcontractor responsibilities.

EPC Contractor's ESHS team is to include appropriately qualified personnel covering following roles (individual positions may combine multiple roles as appropriate):

- 1 x ESHS Manager(s) (responsibilities including Environmental, Health and Safety, and Cultural Heritage aspects) (must be EPC employee)
- 1 X Human resource officer (part time)
- 1 x Social officer (must be EPC employee) (part time / shared role)
- 2 x Senior HSE supervisor (must be EPC employee)
- HSE Supervisors (may be EPC or subcontractor employee)2
    - Minimum of one HSE officer to 50 persons on site (per subcontractor) (day and nighttime as needed)
- to ensure permanent presence of one HSE Supervisor on each construction work site and each shift.

In case, during project execution, the monitoring of EPC Contractor's ESHS performance as performed by the Project Owner indicates insufficient ESHS oversight, compliance assurance resources or practices by the EPC or subcontractors, the Project Owner is entitled to enforce required corrective actions on the EPC Contractor. This may include requiring the EPC Contractor to allocate additional ESHS staff and resources.

4 ESHS MANAGEMENT CONTROLS

4.1 General Approach

ESHS Controls in place during the Project construction stage are based on an ESHS compliance assurance (monitoring and reporting) process to ensure that ESHS Project policies, regulations and standards are met.

Project Owner's management controls are focused on the following:

i. implementation of the Project's ESHS Management System described in this ESMP,

ii. implementation by the EPC Contractor of the Project Policies, Regulations and Standards,

iii. oversight of EPC Contractor's activities, and

iv. compliance assurance to verify that the works are performed according to the Project Policies, Regulations and Standards and in line with ESHS management system.

This ESHS compliance assurance process (including the full range of environmental, occupational health and safety, labour and working conditions, socio-economic, community safety and cultural heritage aspects) is implemented at two levels:

2 Subcontractors will have their own on-site E&S staff. Subcontractors with more than ~~20~~ workers shall deploy a dedicated HSE Officer and an additional HSE Officer for each additional 50 workers deployed onsite.

- First level: EPC Contractor's Self-Verification program (inspections, monitoring, reporting) to demonstrate compliance with ESHS policies, regulations and standards, and to provide evidence that EPC meets their obligations. Includes oversight of subcontractors.
- Second level: Project Owner's Oversight and Assurance activities, including subcontractor management.

Oversight is performed by the Project Owner's ESHS staff to ensure that Project Owner's own and EPC Contractor's activities (including their ESHS self-verification) are aligned with the Project standards and the provisions of this ESMP. This includes review of EPC ESHS reports, documentation, monitoring data, procedures & plans, undertaking formal site inspections and attending meetings with EPC Contractors to drive performance and address issues.

Assurance activities are performed by personnel (or specialized service providers) not directly involved in the works being checked, to provide an additional layer of assurance beyond self-verification and oversight and measure the compliance of Project activities. Assurance process comprises targeted audits and formal reviews. Assurance activities are typically detailed and focused on defined risk areas or guided by feedback from the results of the self-verification and oversight activities.

In addition to the above, independent audits of compliance with Project Requirements, Regulations and Standards and including both Project Owner's and EPC Contractor's performance are performed periodically, typically on annual basis.

The controls put in place to manage, monitor, measure and report compliance with Project ESHS policies, regulations and standards during the Project construction stage are outlined in this ESMP section.

4.1.1 Management of Unplanned Events

The Project implements measures to reduce the likelihood of unplanned events and to manage their consequences if they occur. This includes health and safety, vehicle and traffic risks, waste, hazardous substance releases, fire, natural hazards, and turbine-related risks.

The Project follows the relevant ESHS Management Plans (e.g., Occupational Health & Safety Plan, Emergency Preparedness Response Plan, Waste Management Plan, Pollution Prevention and Control Plan) to ensure that:

- Risks are identified in advance and preventive measures are applied.
- Responsibilities are clearly assigned for monitoring, reporting, and responding to incidents.
- Emergency response procedures are in place to control and mitigate any consequences.
- Contractors and staff are trained on safety and emergency procedures.
- Monitoring, inspections, and adaptive measures are applied as needed.

4.1.2 Management of Cumulative Impacts

The Project assesses potential cumulative impacts in combination with other existing and planned developments. While the Project's contribution is expected to be minor, measures are applied to manage cumulative effects, including:

- Coordination with other developers, local authorities, and stakeholders to minimize combined impacts on sensitive receptors.
- Monitoring of key environmental and social aspects to identify any unexpected cumulative effects.
- Adaptive management to respond to any trends that indicate increasing impacts.

- Alignment with regional programs or initiatives that support the sustainable management of shared resources or ecosystems.

4.2 EPC Contractor Self-verification Program [DO]

EPC Contractor is required to operate an Environmental and Social Management System (ESMS) in alignment with the principles of ISO14001 and ISO45001, which requires self-verification of compliance in accordance with the plan-do-check-review cycle (ESMS accreditation to ISO14001 and ISO45001, although recommended, is not a requirement).

As part of its construction works planning, EPC Contractor is required to prepare and implement an EPC ESHS Plan and topic-specific Contractor Management Plans (refer to sections 2.5.1 and 2.5.2). These EPC Contractor ESHS management planning documents will detail how the EPC Contractor complies with the specific Project ESHS (including environmental, occupational health and safety, labour and working conditions, socio-economic, community safety and cultural heritage aspects) policies, regulations and standards through a self-verification program including:

- Performing ESHS inspections and audits of own (EPC) and subcontractors' activities;
- Performing ESHS monitoring;
- Implementation of a non-conformance and incident notification and response procedure;
- Implementation of an EPC Contractor ESHS Action Tracking System.

4.2.1 EPC Subcontractor Management [DO]

The EPC Contractor must coordinate, supervise and monitor all its Subcontractors and ensure that safe practices are implemented, and work is conducted safely and in strict compliance with the Project Company ESMP. The EPC Contractor must prepare a Subcontractor Management Plan defining its approach to managing the ESHS performance of their contractor, subcontractors, and other third parties during the various phases of the project. The contractor management approach will be consistent with the general principles described within IFC Good Practice. Managing Contractors' Environmental and Social Performance and will include a program for audit of E&S performance of EPC contractors and subcontractors, specifying frequency of audit (at least monthly during construction phase), reporting and roles and responsibilities. The EPC must verify the sufficient subcontractor's environmental and social safety management system. Personnel from subcontractors will be treated the same way as those from the EPC Contractor.

The EPC Contractor's management team will be responsible for ensuring sub-contractor performance, including:

Adequately informing sub-contractors of the requirements of the Project ESMP (this document) and the Contractor C-ESMP and ensuring they can adhere to the requirements.

- Making sub-contractors fully aware of all the E&S and occupational health and safety (OHS) and labour rights requirements that must be adhered to through back-to-back provision contract documentation.
- Identifying the procedures for monitoring and reporting sub-contractor performance and integrating this into overall site reporting requirements.

The EPC-ESHS Management Plan must include organization charts for the roles set out above. The EPC Contractor must be able to evidence to the Owner of the subcontractor's ESHS qualification, which must be based on demonstrated capability in ESHS management. Risks and hazards associated with the subcontractor's work must be identified and addressed in the EPC Contractor ESMS.

4.2.2 EPC Contractor Inspections and Audits

To provide assurance that the provisions of the topic-specific management plans/method statements are implemented effectively, EPC Contractors are required to implement a program of documented inspections and audits at Project sites and the associated facilities addressing own activities and those performed by subcontractors.

This includes undertaking walk-around inspections during construction works execution to visually monitor that mitigation measures are implemented, undertaking joint inspections with the Project Owner, and engagement with project-affected parties, stakeholders and regulators. These activities will also include, in addition to the ESHS matters, inspection of subcontractors' workforce management aspects (including labour and working conditions and workers accommodation) against Project Requirements, Regulations and Standards with quarterly frequency.

EPC Contractor's internal audits will be performed in line the EPC Contractor`s management system procedures as approved by the Project Owner. As a minimum ESHS internal audits are to be performed by the EPC Contractor on annual basis. Focused audits or performance reviews addressing specific aspects as required in line with the Project stage are to be performed every 6 months. The audits are to be performed by an interdisciplinary team of appropriately qualified health and safety, environmental and social auditors. Project Owner's ESHS staff may join the EPC audit team and participate in the EPC Contractor's internal audits.

4.2.3 EPC Contractor Action Tracking, Non-conformance and Incident Response and Notification System

In response to any issues, observations, non-conformances and incidents, the EPC Contractor is to propose appropriate corrective actions and record these (including responsibilities and timescale for completion) in its own ESHS (including environmental, occupational health and safety, labour and working conditions, socio-economic, community safety and cultural heritage aspects) Action Tracking System (ATS). The ATS shall be implemented to ensure recording and follow-up of Non-conformances and incidents and their associated corrective actions.

Project Owner's ESHS management staff will regularly review EPC Contractor's ATS, typically on weekly basis, and will follow-up on progress to confirm closure of measures.

A two-tier non-conformances management process has been defined for the Project (refer to section 4.4) following a risk-based approach in line with the Project Owner's Non-Conformance Management Procedure. Non-conformances identified as result of inspections, monitoring and audits performed are recorded by EPC Contractor as actions to be addressed in line with their own management systems and reported to Project Owner in the monthly reports as a minimum.

EPC Contractor is required to implement their own ESHS Non-conformances and Incident Reporting and Investigation procedures. All ESHS incidents and near misses will be notified to the Project Owner. Incidents will be notified immediately as they occur, while near misses will be reported on weekly basis.

The Project Owner reserves the right to carry out its own investigations of EPC accidents/incidents/near-misses/non-conformances or assist the EPC investigation teams.

Project Owner's ESHS Manager will review the Non-conformances and incidents reports of the EPC Contractor. Project Owner's ESHS Manager will regularly meet relevant EPC Contractor representatives to review the Action Tracking System and status of actions progress and closure.

4.2.4 EPC Contractor Monitoring and Reporting

The procedures for monitoring implementation and outcomes of the ESHS mitigation measures, ESHS KPIs and environmental and social monitoring are defined by the EPC Contractor in their CMPs and method statements. The monitoring frequencies, parameters, methodology and duration are determined based upon the site activities requiring monitoring and are assessed on a case-by-case basis dependent upon construction activity type and location. The EPC Contractor is responsible for reporting monitoring results to the Project Owner on monthly basis.

4.3 Project Owner's ESHS Oversight and Assurance Program

4.3.1 Project Owner's ESHS Oversight (Monitoring) [DO]

ESHS oversight is aimed at monitoring construction activities to determine whether environmental, occupational health and safety, labour and working conditions, socio-economic, community safety and cultural heritage mitigation measures implemented by EPC Contractors are effective (i.e. whether these avoid, minimise the impacts as intended, or whether work practices require revision).

During construction stage, ESHS oversight monitoring is coordinated by the Project Owners ESHS Manager and performed through ongoing review and follow-up on EPC Contractor's weekly and monthly reports and on non-conformance/incident reporting, as well as through inspections of the construction worksites.

The ESHS oversight inspections are performed regularly, on a monthly basis, and are intended to highlight key EPC Contractor conformance aspects, and their outcome is used to determine the required actions. In addition to the regular monthly inspections, unscheduled inspections (spot-checks) of critical/key Project areas are performed as needed. The locations and timing of the unscheduled inspections are determined based on the ongoing Project activities and issues, as informed by the EPC Contractor's weekly/monthly reports and the non-conformance/incident reporting outcomes.

The ESHS oversight is aimed at addressing all Project ESHS aspects and worksites and ensuring that each of them are visited by the Project Owner's ESHS management site weekly as a minimum or more often as needed in response to ongoing issues and ESHS management needs.

Checklists may be used in support of the field inspections which may be organized based on specific ESHS topics addressing key aspects associated with the construction works being inspected.

Inspections, observations and findings are discussed with EPC ESHS representatives to determine and agree on any actions required.

Project Owner's ESHS oversight (monitoring) reports are generated as simple records to include:

- indication of the construction works/site inspected;
- indication of the construction activities inspected;
- observation notes providing description of positive aspects, good practice or issues/non-compliances identified;
- photographic evidence of the observations made/issues identified.

Where ESHS oversight (monitoring) inspections identify issues or Non-conformances, the remedial actions required in response are discussed and agreed with the EPC Contractor and recorded into the EPC Contractor's ATS.

4.3.2 Project Owner's Regular ESHS Oversight Reporting [DO]

A brief ESHS oversight report is provided by the ESHS Manager to the Project Management on monthly basis. The report summarizes the key issues and challenges during the reporting period as resulted from the ESHS oversight inspections and the review of the EPC Contractors' ESHS reports and ATS status.

Regular reporting is intended to keep the Project Management informed on ESHS aspects, so that direction and feedback can be provided to EPC Contractors and leadership support obtained for addressing key and more strategic issues at appropriate decision levels as applicable.

4.3.3 Project Owner's Solutions ESHS Assurance Audits [CHECK]

Environmental, social, health and safety audits of the EPC Contractor are performed on annual basis or upon attaining specific construction works delivery milestones by the EPC Contractor (e.g. 0 – 50%, 50-100% construction works execution).

The ESHS Assurance Audits are conducted primarily by Project Owner's own staff independent of the activities audited, or by contracted third-party specialists to provide assurance of oversight and self-verification activities.

The EPC Contractors are formally notified about the ESHS audits and their scope which include but may not be limited to:

- EPC Contractor ESHS organization/staffing adequacy;
- EPC Contractor ESHS documentation;
- Implementation by EPC Contractor of the ESMP and CMPs, method statements and specific ESHS Procedures;
- ESHS training and inductions;
- ESHS Key Performance Indicators (KPIs);
- ESHS Non-conformance and incident reporting, tracking and closure.

Audit protocols are developed based on the defined scope and used by auditors for guidance and for recording audit observations including good practice and non-conformances.

Audit outcomes are summarized in reports and formally communicated to and discussed with the EPC Contractor. Any required corrective actions are agreed with the EPC Contractor and recorded in their ATS and/or Non-conformance Reporting system as appropriate. Progress in addressing the audit findings is followed up on a regular basis to close the open and pending actions and reported monthly.

4.3.4 Key Performance Indicators (KPI) [CHECK]

The Project Owner and the EPC Contractor will track and monitor various performance indicators both leading and lagging so as to identify potential trends in environmental, safety and social performance, as defined in the topic-specific management plans. These are defined in Section 4.5 (reporting) below.

4.4 Incident and Non-conformances Reporting, Investigation and Corrective Actions [ACT]

Non-conformances and incidents are recorded, reported, investigated and addressed.

All non-conformances and incidents (including near misses) will be investigated to establish the immediate and underlying/root causes (plans must be established to deal with immediate risks following unforeseen events) and to identify actions to:

- Evaluate and correct the situation as quickly as possible;
- Assess and limit adverse ESHS consequences of the incident;
- Prevent reoccurrence and improve ESHS performance; and
- Ensure planned actions integrate with other ESHS requirements, including contractor interfaces where appropriate;
- Improve future risk management;
- Ensure lessons are learned throughout the Project organization;
- Demonstrate commitment to effective ESHS management.

Non-conformances are unapproved deviations from Project ESHS Specifications or Standards or deviations from Project Owner's or EPC Contractor's Management Plans. These are typically identified through the oversight and assurance process (e.g. daily monitoring, oversight inspections and audits).

Non-conformities may be categorised as minor or major and are recorded and reported in a pre-defined format including description of source/cause, categorization (severity), description and evidence, responsible party and corrective actions.

Non-conformances are recorded in a register maintained by the EPC Contractor and acting as a tool for following up on non-conformances to closure.

Incidents are classified using a 3-level severity scale (i.e. Minor, Serious, Major). All incidents and accidents taking place on contractor's locations and/or facilities, while under contract with the Project Owner will be reported to the Project Owner's management by e-mail within 12 hours from incident occurrence. In addition, immediate telephone notification will be made for severity 2 and 3 incidents.

All incident investigations are conducted and documented to appropriate level of detail dependent upon the severity of the incident.

Actions identified as being required in the incident investigation report are recorded on Corrective Action Forms to prevent reoccurrence of similar incident. Action plans for the remedial measures implementation as identified in the investigation are defined and include information on responsibilities, resources required, completion dates and reporting requirements.

The status of corrective actions and associated action plans are tracked and once all the actions are completed, this is recorded in a Corrective Action Form signed off for closure. The status of corrective actions implementation and closure is tracked in the Project Incident Register.

Incident reports and key incident statistics are analysed for trends for each Project activity and reported on a monthly basis as part of the performance monitoring program. Relevant findings are communicated throughout the Project organization.

Arrangements for incident reporting and investigation system, as well as the effectiveness of corrective actions are periodically reviewed, as a minimum with annual frequency, as part of the management review process.

4.5 ESHS Reporting

ESHS reporting is the mechanism through which the EPC Contractor, the Project Company and the Lenders' E&S Consultant (LESC) communicate the results of Environmental, Social, Health and Safety (ESHS) performance during construction and operation.

Reporting provides regular, structured updates to demonstrate compliance with national regulations, Project commitments, contractual obligations, and IFC Performance Standards.

Reporting is directly informed by the ESHS monitoring activities described in the Monitoring Plan (see Appendix C).

The following reporting activities are required to be performed:

Table 4-1 Reporting requirements

Reporter	Report Type	Frequency	Main Content	Recipient
EPC Contractor	Daily ESHS Report	Daily	Incidents, non-compliances, daily H&S & environmental observations	Project Company
	Weekly ESHS Report	Weekly	H&S inspections, CHSS checks, grievances, traffic, non-compliances	Project Company
	Monthly ESHS Report	Monthly	Full E&S compliance summary; waste, resources, biodiversity, grievances	Project Company
	Monthly H&S Report	Monthly	Incident statistics, safety observations, training	Project Company
	Monthly Waste Report	Monthly	Waste volumes, disposal records, authorised contractors	Project Company
	Monthly Resource Use Report	Monthly	Water, fuel, electricity, CO_2 estimate	Project Company
	Incident / Deviation Reports	Immediate or as required	Serious incidents, follow-up actions	Project Company
	Construction Completion E&S Report	End of construction	Final ESHS performance summary	Project Company
Project Company	Monthly Construction E&S Report	Monthly	Consolidated EPC reporting, grievances, compliance status	Lenders / internal
	Community Grievance Summary	Monthly	Complaints and follow-up	Internal / Stakeholders
	Incident & Deviation Management Reports	As required	Corrective actions, close-out	LESC / Lenders
	Inputs to LESC	Quarterly	Monitoring data, clarifications	LESC
LESC	Quarterly ESMR	Quarterly	Independent E&S assessment	Lenders
	Annual ESMR	Annual	Operational E&S performance	Lenders

Reporter	Report Type	Frequency	Main Content	Recipient
Project Company (Operation)	Annual Public E&S Report	Annual	Non-technical disclosure	Public / stakeholders
	Major Incident Reporting	Immediate	Serious incidents	Authorities / Lenders

4.6 External Reporting [ACT]

The Project Owner will prepare an annual report on environmental; health and safety performance and implementation of the stakeholder engagement plans and grievance procedure. The annual report will be disclosed on the Project website.

In addition, the Project Owner commits to following external reporting:

- Statutory Notifications and Reporting to national regulatory bodies as required in line with the applicable regulations and Project permits,
- Community engagement and grievances; and
- Incident Notification and Reporting.

According to the incident reporting procedure in place, medium and major incidents (fatalities included) are to be reported to authorities within 2 hours from occurrence. Any such incidents will be also reported to Project lenders within 12 hours[3].

All environmental and social incidents will be appropriately documented, notified and reported in accordance with established procedures as indicated in previous sections of this ESMP.

Incident notification and reporting to relevant national regulatory bodies will be performed in line with applicable regulations in force and as stipulated in permits and licenses.

3 Note: to be confirmed based on CTA

5 MANAGEMENT OF CHANGE [DO]

The process in place to manage changes impacting ESHS aspects of the Project are integrated in the overall change management process applicable to all Project Changes.

ESHS changes addressed in this ESMP section include:

- new planned activities or processes and or changes in project activities, design or footprint leading to potential impacts that were not subject to assessment as part of the Project ESIA package;
- changes to ESHS management, mitigation and monitoring commitments not considered in the Project ESIA package;
- changes/updates of legal and regulatory requirements, technical codes and business objectives that may trigger potential impacts that were not subject to assessment as part of the Project ESIA.

Triggers for consideration in relation to changes specified above may include:

- Design refinement or detailed design outcomes
- Changes in construction methodologies;
- Field obstacles during construction;
- Results of further field surveys and monitoring;
- Comments/concerns submitted by public/stakeholders/lenders;
- Changes in regulations or requirements by regulatory bodies.

The Management of Change provides for a simple ESHS management of change process, as represented in Figure 5-1 below as also defined by IFC PS1.

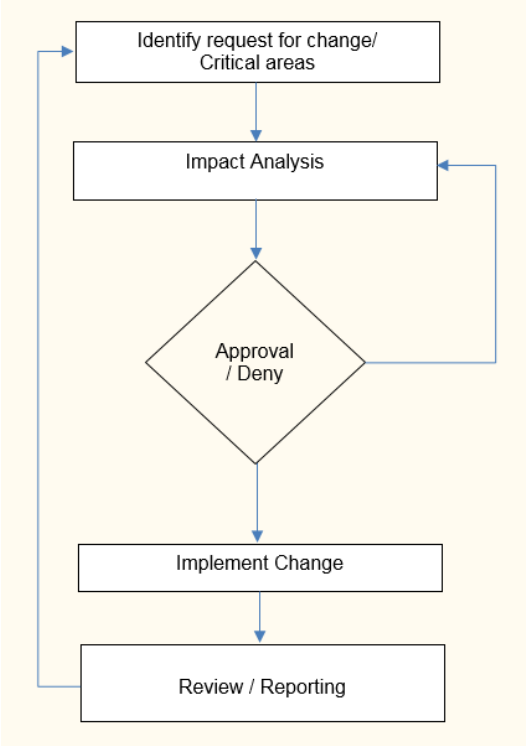

Figure 5-1 ESHS Change Management Process

The ESHS change management process is managed by the ESHS Manager and comprises the following main steps.

1. **Change Identification**

ESHS changes are identified various ways, including requests by the EPC, engineering, construction teams and are summarised in a Management of Change Form.

2. **Change Impact Analysis and Notification of Changes**

Upon receiving the Management of Change Form, the EHS Manager with the support of the ESHS Specialist undertakes performs:

- An assessment of proposed change risks
- A screening review of any proposed changes that have the potential to give rise to new or additional significant impacts (positive or negative) which differ to those identified as part of the ESIA Package.

The screening will be performed by/under the direction of the ESHS Manager with involvement, as warranted, of other Project Owner staff and EPC Contractor Environmental Expert/Design Team, and/or with support from external specialized consultants. To assist with the review, a Change Screening Matrix will be used.

The potential outcomes of the Changes Screening can be grouped in 3 tiers in relation to environmental and social impacts (in line with the corresponding definitions in the ESIA package) as follows:

- Tier 1 Changes – Changes where the potential impact of the change prior to mitigation will be no more than minor.
- Tier 2 Changes – Changes where the potential impact of the change prior to mitigation will be moderate.

- Tier 3 Changes – Change were the potential impact of the change prior to mitigation will be major.

Tier 1 Changes will be implemented by the Project Owner without notifying the St. George Solar PV Project lenders.

For Tier 2 Changes, Project Owner will inform the Project Lenders of the change but will not have to secure their approval prior to implementing the change.

For Tier 3 Changes, Project Owner will seek approval from the Project Lenders prior to implementing the change.

The following changes will be considered as Tier 3 Changes:

- Changes to the Project design and footprint or activity that may result in a potential new major impact, or elevate an impact already assessed to a potential major impact.
- Changes in commitments to mitigate or avoid potential impacts that may result in a potential new major impact.

6 ESHS TRAINING [DO]

6.1 Objectives

The Project Owner is committed to ensure that ESHS training is delivered to all staff as required for delivering their roles. In the frame of the recruitment process, Project staff is verified for competency and experience. Following employment with the Project, the staff receive adequate induction and ongoing ESHS training according to a training plan.

The aim of the induction training is to make Project staff aware of the actual or potential actual or potential ESHS risks associated with their work activities, their behavior, and of the potential consequences of departure from the Project ESHS procedures.

In addition to the induction, the new Project staff will further undertake specific ESHS training commensurate with their roles. Employed training process shall take into account different levels of responsibility, ability, language skills, and risks associated with each position.

A system for evaluating the effectiveness of the training or action taken will be implemented. Training records will be documented and held on file.

EPC Contractor and service providers are contractually bound to implement specified ESHS training requirements.

6.2 EPC Obligations

The EPC Contractor's ESHS training and competency requirements are contractually specified.

EPC Contractor shall ensure that all construction employees (own and subcontractor staff) are adequately qualified and have the ESHS knowledge and skills required for the execution of their work duties.

Prior to the commencement of the work, EPC Contractor shall submit a Training Plan identifying specific training requirements against each job title for review and acceptance by the Project Owner.

The Training Plan is to be based on an analysis of training requirements and should comprise:

- an induction training program to be delivered to all personnel (own and subcontractor staff), vendor representatives and site visitors;
- general and job/task-specific training as needed for the performance of the duties to which the person (own and subcontractor staff) is assigned to.

The Training Plan will include a Competency/ Training Matrix. The Competency/ Training Matrix is to be developed as a tool documenting and comparing the required competencies for a position with the existing skill level of the employees performing the roles and shall be used to determine the training needs. The Competency/ Training Matrix is also to be used as a tool for managing people development.

The Training Plan and the Competency/ Training Matrix are to provide the mechanism to ensure that training is timely delivered, and the training program is effective. For this purpose, the EPC Contractor is to perform regular evaluations throughout the construction works period to ensure that the Training Plan has achieved its objectives i.e. that all staff (own and subcontractor employees) are suitably qualified, competent and fit for their job duties. The frequency and timing of such evaluations is to be determined by the EPC Contractor and subject to Project Owner's approval.

Implementation of ESHS training requirements will be reviewed by the Project Owner throughout the contract period according to the provisions of this ESMP.

7 MANAGEMENT REVIEW [CHECK]

Management Review is a key element of the ESMP Cycle, closing the adaptive management loop as part of the continual improvement process of the implemented management system.

Project Owner's and EPC Contractor's management reviews are undertaken at several levels of the organization and include the following:

- Project Owner performance reviews.
- EPC Contractor's ESHS functional and project cross-functional reviews.
- Project management meetings.
- Weekly and monthly ESHS function meetings.

Project Owner's senior management periodically review the overall effectiveness of the ESHS management system, annually as a minimum. The scope of the ESHS Management Review include:

- Provide management with a summary of yearly ESHS performance, including:
    - Non-conformances and corrective actions
    - Monitoring and measurement results
    - Audit results
    - Stakeholder feedback and concerns (as resulting from the stakeholder engagement process)
    - Adequacy of ESHS resources
    - ESHS performance
    - ESHS incident trends, response, and reporting.
- Identify opportunities for and drive continual improvement.
- Summarize the significant ESHS risks and envisaged risk management in the following period.

The annual ESHS Management Review will inform the annual ESHS planning and targets as well as any changes including resource needs.

APPENDIX A RELEVANT LAWS AND REGULATIONS

Law / Regulation	Topic Covered	Description	Relevance to the Project
Law 137/1995 on Environmental Protection (as amended)	General environmental protection	Framework law establishing principles of environmental protection, referencing EIA as essential for managing environmental impacts.	Requires completion of EIA before construction permit; sets overarching environmental protection duties during construction and operation.
Law 292/2018 on Environmental Impact Assessment	Environmental Impact Assessment	Establishes EIA procedures, public consultation, responsibilities, and environmental protection requirements.	Governs the Project's EIA procedure, public participation, and issuance of the Environmental Agreement, which is mandatory for construction.
Law 104/2011 on Ambient Air Quality	Air quality	Transposes Directive 2008/50/EC; sets limit values for pollutants, monitoring methods and criteria.	Requires control of dust, emissions, and air quality impacts from construction activities and traffic; relevant for operational dust/noise interactions.
Law 107/1996 on Waters	Water protection and management	Establishes water quality objectives and protection requirements; regulates interventions affecting surface and groundwater.	Requires protection of water bodies, proper management of wastewater, stormwater, and prevention of contamination during construction and operation.
Law 49/2011 amending OUG 57/2007 on Nature Protection	Biodiversity, protected areas	Establishes protected areas regime, conservation of habitats and species, Natura 2000 obligations.	Requires biodiversity assessment, monitoring, and avoidance of impacts on habitats and protected species (birds, bats, flora).
GEO 92/2021 on Waste Management	Waste	Transposes EU Waste Directive 2018/851; defines waste hierarchy, prevention, handling, storage, disposal obligations.	Governs construction waste, hazardous waste, soil management, segregation and disposal; requires waste records and authorised contractors.
Law 121/2019 on Noise Protection	Noise	Regulates noise assessment, management, and mitigation for major noise sources.	Requires control of construction noise, operational turbine noise, monitoring and mitigation, plus complaint management.
Law 195/2002 (republished as Law 49/2006) on Road Traffic Safety	Traffic, road safety	Defines behavioural rules for traffic, signage, vehicle safety and licencing.	Applies to construction transport, oversized loads, temporary access roads, driver requirements and community road safety.

Law / Regulation	Topic Covered	Description	Relevance to the Project
Law 422/2001 on Cultural Heritage (with Laws 26/2008, 451/2002)	Cultural heritage protection	Establishes preservation, access, obligations and procedures for cultural heritage sites.	Requires Chance Find Procedure, archaeological supervision, reporting to cultural authorities and compliance with the Cultural Permit.
Law 53/2003 – Labour Code	Labour rights, employment	Prohibits discrimination, regulates employment rights, contracts, working conditions.	Governs labour relations, working hours, equal treatment of workers, grievance access and contractor labour responsibilities.
Law 319/2006 on Occupational Safety and Health (amended)	OHS	Establishes obligations to prevent occupational injuries and protect worker health and safety.	Key basis for the Project's OH&S Plan; governs safety risk assessments, PPE, training, incident reporting, emergency preparedness.
GD 1425/2006 (Methodological Norms for Law 319/2006)	OHS implementation	Provides detailed implementation requirements for occupational safety and health management.	Defines mandatory OHS procedures for construction contractors, subcontractors, supervision and compliance.
Government Decision 1076/2004 on SEA Procedures	Strategic environmental assessment (SEA)	Transposes Directive 2001/42/EC; sets requirements for evaluating strategic plans/programmes.	Required for PUZ/urban planning procedures linked to project siting; ensures integration of environmental considerations at planning stage.
EU Birds Directive (79/409/EEC) & Habitats Directive (92/43/EEC) (via OUG 57/2007 and related guidance)	Natura 2000, species & habitat protection	Establishes conservation obligations and appropriate assessment requirements.	Mandates Appropriate Assessment for Natura 2000 impacts, bird and bat monitoring, operational collision risk management.
Ministerial Order 19/2010 amended by OM 262/2020	Appropriate Assessment methodology	Provides methodology for assessing impacts on Natura 2000 sites.	Applies to biodiversity assessment and operational bird/bat monitoring.
SEA / EIA International Conventions (Espoo Convention 1991; SEA Protocol 2003)	Transboundary environmental assessment	Sets procedures for assessing cross-border impacts and consultation.	Applicable if the project might have transboundary effects; informs consultation and documentation requirements.
Civil Code of Romania	Land rights, contracts	Regulates ownership, land transactions, tenant rights and obligations.	Relevant to land acquisition, easements, cable routes, compensation agreements.
Law on Cadastre 105/2019	Land registration	Defines property boundaries, cadastral registration processes.	Necessary for land acquisition, ROW definition and securing construction permits.
Law 350/2001 on Urban Planning (amended)	Spatial planning	Regulates land-use planning, urban development, zoning procedures.	Required for PUZ approval used to support project permitting.

Law / Regulation	Topic Covered	Description	Relevance to the Project
GEO 34/2013 on Permanent Grassland Management	Grassland use	Rules for management and protection of permanent grasslands.	Relevant if project areas include grassland parcels; governs any conversion or temporary occupation.
GEO 445/2009 on Impact Assessment	EIA permitting	Defines list of projects subject to EIA, procedures, screening, scoping and public consultation.	Applies to the entire EIA process leading to Environmental Agreement.

APPENDIX B COMMITMENT REGISTER

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
AQ-01	Restricting the removal of vegetation and soil cover strictly to areas necessary for project activities, thereby minimizing exposed surfaces susceptible to wind erosion.	Mitigation	Air Quality	Construction	EPC Contractor	During site preparation	Construction ESMP
AQ-02	Sequencing land clearance and earthworks to ensure that only the smallest possible area is exposed at any given time.	Mitigation	Air Quality	Construction	EPC Contractor	During site preparation	Construction ESMP
AQ-03	Maintaining existing vegetation cover for as long as possible, and delaying topsoil stripping until immediately before construction, to reduce the risk of erosion.	Mitigation	Air Quality	Construction	EPC Contractor	During construction	Construction ESMP
AQ-04	Regularly wetting access roads, particularly during dry periods and in areas close to residential properties, to suppress dust generation.	Mitigation	Air Quality	Construction	EPC Contractor	During construction	Pollution Prevention and Control Plan
AQ-05	Ensuring that all transported bulk materials are covered with tarpaulins to prevent fugitive dust emissions during transit.	Mitigation	Air Quality	Construction	EPC Contractor	During construction	Pollution Prevention and Control Plan
AQ-06	Vegetating stockpiles that will be stored for more than six weeks, and locating them as far as practicable from sensitive receptors.	Mitigation	Air Quality	Construction	EPC Contractor	During construction	Pollution Prevention and Control Plan
AQ-07	Promptly addressing any air quality-related grievances received from neighboring communities through the established Community Grievance Mechanism.	Mitigation	Air Quality	Construction	Project Company / EPC Contractor	During construction	Stakeholder Engagement Plan
AQ-08	Enforce a strict speed limit of 30 km/h on all unpaved surfaces, particularly on the access road to the site. National speed limits must also be observed on	Mitigation	Air Quality	Construction	EPC Contractor	During construction	Traffic Management Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
	public roads to minimize dust and exhaust emissions.						
AQ-09	Ensure that all construction vehicles and machinery are subject to regular maintenance schedules. Well-maintained engines operate more efficiently and emit fewer pollutants.	Mitigation	Air Quality	Construction	EPC Contractor	During construction	Pollution Prevention and Control Plan
AQ-10	Require that vehicles and equipment are switched off when not in use, except where continuous operation is necessary for health and safety reasons (e.g., maintaining air conditioning during extreme temperatures).	Mitigation	Air Quality	Construction	EPC Contractor	During construction	Traffic Management Plan
AQ-11	Implement effective traffic management strategies to avoid unnecessary travel through settlements and residential areas. Careful planning should also aim to minimize congestion and optimize travel routes.	Mitigation	Air Quality	Construction	EPC Contractor	During construction	Traffic Management Plan
AQ-12	Prioritize the use of modern vehicles and equipment that comply with up-to-date emission standards. Routine maintenance and the use of low-sulphur fuels should be standard practice to further reduce emissions.	Mitigation	Air Quality	Construction	EPC Contractor	During construction	Pollution Prevention and Control Plan
N-01	Ensure diesel engines are switched off when not in use, and operate at the lowest possible speed consistent with task requirements.	Mitigation	Noise	Construction	EPC Contractor	During construction	Traffic Management Plan
N-02	Maintain all machinery in good condition, paying particular attention to exhaust silencers, engine and transmission covers, and any squeaking or rattling components. Excessively noisy machines should be repaired or removed from the site. Where feasible, select the quietest equipment available for each task.	Mitigation	Noise	Construction	EPC Contractor	During construction	Pollution Prevention and Control Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
N-03	Plan plant, equipment, and vehicle movements to avoid excessive use of motion alarms (e.g., when reversing) and reduce peak noise emissions.	Mitigation	Noise	Construction	EPC Contractor	During construction	Traffic Management Plan
N-04	Drivers should be instructed to travel directly to and from the site, avoid unnecessary idling, and maintain quiet operation near sensitive receptors, particularly during early mornings or evenings.	Mitigation	Noise	Construction	EPC Contractor	During construction	Traffic Management Plan
N-05	Adopt work methods that minimize the total duration of high-noise activities and the number of active noise sources on site. Schedule tasks in a way that reduces overlapping high-noise operations.	Mitigation	Noise	Construction	EPC Contractor	During construction	Construction ESMP / Pollution Prevention and Control Plan
N-06	Limit high-noise construction works to daytime hours (typically 07:00–22:00) and, where possible, avoid work on Sundays or public holidays.	Mitigation	Noise	Construction	EPC Contractor	During construction	Construction ESMP
N-07	For works in close proximity to sensitive receptors (e.g., transmission line or access road construction), apply additional noise-reducing measures such as temporary acoustic barriers, careful sequencing of operations, or temporary rescheduling of particularly noisy tasks.	Mitigation	Noise	Construction	EPC Contractor	During construction	Construction ESMP / Pollution Prevention and Control Plan
N-08	If any validated noise complaints are received, identify the source and implement additional noise control measures as appropriate. Maintain ongoing monitoring and proactive management to address potential concerns quickly through the grievance mechanism.	Mitigation	Noise	Construction	Project Company / EPC Contractor	During construction	Stakeholder Engagement Plan
N-09	Ensure that turbines installed comply with modern low-noise designs, such as	Mitigation	Noise	Operation	Project Company	During supplier selection	Operation ESMP

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
	serrated trailing edges and aerodynamic optimization systems.						
N-10	Consider periodic monitoring of turbine noise emissions to confirm compliance with national and EU standards, particularly in locations closest to residential areas.	Mitigation	Noise	Operation	Project Company	Annually	Operation ESMP
N-11	Where feasible, utilize turbine control strategies that reduce sound emissions during nighttime or periods of low wind speed when background noise is minimal.	Mitigation	Noise	Operation	Project Company	During operations	Operation ESMP
N-12	Restrict operational traffic to essential trips only, particularly during night-time hours, to reduce potential disturbance.	Mitigation	Noise	Operation	Project Company	During operations	Traffic Management Plan
N-13	Ensure that all vehicles are in good mechanical condition to minimize engine and exhaust noise.	Mitigation	Noise	Operation	Project Company	During operations	Traffic Management Plan
N-14	Instruct drivers to avoid unnecessary idling and to drive at moderate speeds on site access roads. Minimize the use of horns and avoid revving engines near sensitive receptors.	Mitigation	Noise	Operation	Project Company	During operations	Traffic Management Plan
N-15	Implement a system to register and address any noise complaints from local residents promptly. Adjust operational procedures as necessary to mitigate verified concerns.	Mitigation	Noise	Operation	Project Company	During operations	Stakeholder Engagement Plan
SOIL-01	Implementation of soil protection and erosion control measures within the Project Pollution Control Plan (PPCP), including dust suppression, temporary soil stabilisation, and storm-water and sediment management during construction.	Mitigation	Soil	Construction	EPC Contractor	During construction	Pollution Prevention and Control Plan
SOIL-02	Sites/vegetation clearance, sites preparation, excavations, and improvement of existing roads and	Mitigation	Soil	Construction	EPC Contractor	During site preparation	Construction ESMP / Pollution

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
	construction of additional access roads should not be carried out during periods of torrential rains or storms and heavy wind, to minimize compaction and erosion.						Prevention and Control Plan
SOIL-03	Rehabilitation interventions in the priority areas (i.e. areas where there is a low likelihood of natural revegetation or where areas are prone to compaction and erosion from surface runoff) should be prioritised.	Mitigation	Soil	Construction	Project Company / EPC Contractor	At the end of construction	Pollution Prevention and Control Plan
SOIL-04	Should compaction and erosion events be identified, appropriate remedial actions, including restoration of the compacted and/or eroded areas, and where necessary, the relocation of the paths causing the compaction and/or erosion, should be undertaken.	Mitigation	Soil	Construction	EPC Contractor	During construction	Pollution Prevention and Control Plan
SOIL-05	Land/vegetation clearance should only be undertaken immediately prior to construction activities taken place there.	Mitigation	Soil	Construction	EPC Contractor	During site preparation	Construction ESMP
SOIL-06	Unnecessary land/vegetation clearance should be avoided.	Mitigation	Soil	Construction	EPC Contractor	During site preparation	Construction ESMP
SOIL-07	The footprints for all construction sites and areas for associated facilities/infrastructure (e.g. borrow and disposal areas, lay-down areas, construction/management sites and temporary offices) should be restricted to minimum feasible extent with measures implemented to avoid footprint creep.	Mitigation	Soil	Construction	EPC Contractor	During construction	Construction ESMP
SOIL-08	Unless foreign material, such as aggregate (e.g. crushed stone, ballast, gravel, sand), needs to be inserted, after the installation of features requiring the excavation of a deep holes, soil should be replaced in the holes so as to mimic the pre-construction profile.	Mitigation	Soil	Construction	EPC Contractor	During construction	Pollution Prevention and Control Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
HYDRO-01	Sediment traps, culverts, and ditches will be installed around Project sites and along access roads to prevent runoff. Exposed surfaces and friable materials will be covered where possible.	Mitigation	Hydrology	Construction	EPC Contractor	During construction	Pollution Prevention and Control Plan
HYDRO-02	A Spill Prevention, Control, and Containment procedure will be in place.	Mitigation	Hydrology	Construction	EPC Contractor	During construction	Pollution Prevention and Control Plan
HYDRO-03	Adequate toilets will be provided for workers, regularly serviced. Sewage and wastewater will be managed by licensed contractors or treatment systems to ensure no raw discharge into the environment.	Mitigation	Hydrology	Construction	EPC Contractor	During construction	Pollution Prevention and Control Plan
HYDRO-04	Washing of vehicles in surface water bodies is prohibited. Designated wash bays with oil, grease, and sediment traps will be used, and all maintenance will be performed in workshops with appropriate containment.	Mitigation	Hydrology	Construction	EPC Contractor	During construction	Construction ESMP
HYDRO-05	All work areas will be kept tidy, with debris and waste contained to prevent runoff during rain events. Vegetation will be maintained around facilities during operation to reduce runoff.	Mitigation	Hydrology	Construction	EPC Contractor	During construction	Pollution Prevention and Control Plan
W-01	Develop and implement a Project-specific Waste Management Plan (WMP) to cover all waste streams (domestic, industrial, hazardous, sanitary wastewater, contaminated soil, concrete washout, medical waste) and ensure proper segregation, storage, handling, recycling, and disposal in accordance with ESIA commitments	Mitigation	Waste	Construction / Operation	Project Company / EPC Contractor	During all project lifecycle	Waste Management Plan
BIO-01	Prepare a Biodiversity and Monitoring Management Plan (BMP)	Mitigation	Biodiversity	Construction / Operation	Project Company	Before construction, to be updated before operations	Biodiversity Management Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
BIO-02	Develop a Biodiversity Action Plan (BAP) to ensure that Net Gain and No Net Loss are achieved for the relevant biodiversity values, in line with IFC PS6 and EBRD ESR6.	Mitigation	Biodiversity	Construction / Operation	Project Company	Before construction, to be updated before operations	Biodiversity Action Plan
BIO-03	Restrict earthworks and vegetation removal to agricultural/pasture (modified) habitats and only where strictly necessary; avoid removing trees and shrubs	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-04	Map and protect nearby Annex I priority habitats (62C0*, 91I0*, 40C0*) using fencing/demarcation; prohibit access and works within these areas	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-05	Clearly demarcate construction zones on maps and on site (e.g., high-visibility tape) to avoid impacts outside permitted areas	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-06	Raise worker awareness on ecological value of flora/habitats and prohibit plant damage; train on environmental procedures	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-07	Reduce vegetation clearing and soil exposure during periods of heavy rainfall to minimise erosion	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-08	Avoid works when the ground is waterlogged, in line with the environmental permit	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-09	Use manual vegetation clearing methods where possible to reduce soil and fauna disturbance	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-10	Use or upgrade existing access roads where possible; prohibit travel on unauthorised routes	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
BIO-11	Prepare and implement a Habitat Restoration Plan using native, site-specific, non-invasive species, including timing, methods, roles, and monitoring	Mitigation	Biodiversity	Construction	Project Owner / EPC Contractor	During construction	Biodiversity Management Plan
BIO-12	Remove and stockpile topsoil prior to earthworks for later reuse	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-13	Decompact soils affected by machinery after works to support habitat recovery	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-14	Restore disturbed areas promptly after construction using native vegetation, following ecological timing and the Restoration Plan	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-15	Use soil, mulch, and vegetation debris (with seed stock) to support natural revegetation where feasible	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-16	Implement maintenance actions to ensure proper development of restored habitats	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-17	Notify ANMAP within 24h of any damage to protected Natura 2000 sites and implement approved restoration measures	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-18	Minimise vegetation clearing and earthworks to strictly necessary areas	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-19	Keep unpaved surfaces moist (e.g., water spraying) to reduce dust, especially in dry/windy conditions	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-20	Limit construction vehicle speeds to max. 30 km/h	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan / Traffic Management Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
BIO-21	Avoid overloading trucks with dusty materials and ensure loads are covered	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-22	Protect or regularly wet stockpiles of granular materials	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-23	Implement the Waste Management Plan and associated minimisation measures	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan / Waste Management Plan
BIO-24	Ensure proper temporary storage and disposal of waste; prevent runoff/spillages; prohibit waste deposition near water bodies or infiltration areas	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-25	Implement spill control and clean-up procedures; collect and dispose contaminated soil via licensed operators	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-26	Provide adequate portable sanitation facilities for workers	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-27	Store fuels and hazardous substances in labelled, secure, watertight containers in designated areas	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-28	Avoid washing/maintenance of machinery on site; if unavoidable, prevent soil contamination	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-29	Comply with Pollution Prevention and Control Plan (PPCP) and Emergency Preparedness Response Plan (EPRP)	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-30	Conduct pre-clearance surveys for fauna; relocate animals if needed; establish 300 m buffers around nests (Mar 15–Aug 15)	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
BIO-31	Schedule works outside breeding/rearing seasons of sensitive species, extending to less-mobile priority species	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-32	Collaborate with biodiversity specialists and develop sensitivity/exclusion maps based on surveys	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-33	Concentrate works in time and avoid evening/night activities (after 22:00)	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-34	Apply noise reduction measures (barriers, deflectors, soundproofing) to meet IFC limits	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-35	Conduct noise monitoring during construction by qualified specialists	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-36	Limit fencing to necessary areas and ensure permeability for fauna (passages, mesh size, ground clearance)	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-37	Install site structures (containers, toilets, etc.) elevated to allow fauna passage and keep them closed when not in use	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-38	Minimise lighting and use types that do not attract insects and bats	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-39	Avoid attracting birds through waste or predictable food sources	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-40	Train staff and contractors in environmental procedures	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-41	Enforce prohibition of hunting, trapping, poisoning, or disturbing fauna; report incidents to authorities	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
BIO-42	Restrict vehicle movement to approved routes and low speeds (20 km/h) to reduce roadkill and disturbance	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan / Traffic Management Plan
BIO-43	Prohibit burning of vegetation or biomass during construction	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-44	Do not allow stray dogs on site	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-45	Implement a fauna monitoring programme during construction	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-46	Develop and implement an Invasive Species Management Plan	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-47	Prohibit vegetation disturbance outside defined construction boundaries	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-48	Restrict movement of personnel and vehicles outside designated access routes, especially in natural habitats	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-49	Limit entry of non-project vehicles to reduce spread of invasive species	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-50	Wash vehicles before entering site	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-51	Base new or temporary access points on existing routes wherever possible	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-52	Raise awareness among workers about invasive plant species	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
BIO-53	Monitor invasive species presence regularly (at least quarterly) by qualified specialists	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-54	Remove invasive species mechanically or manually when detected	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-55	Update invasive species management plans if issues arise	Mitigation	Biodiversity	Construction	EPC Contractor	During construction	Biodiversity Management Plan
BIO-55	Continue post-construction restoration during operation in line with the Habitat Restoration Plan, using native, site-specific, non-invasive species	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-56	Implement maintenance and monitoring of restored areas to ensure proper development of natural habitats	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-57	Limit vegetation removal to designated maintenance areas and avoid disturbance in natural habitats	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-58	Raise awareness among workers on ecological value of flora and prohibit plant damage; provide environmental training	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-59	Ensure proper storage, handling, and disposal of maintenance waste, including containment of runoff and spillages	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-60	Implement spill prevention, containment, and clean-up procedures as per PPCP and Emergency Response Plan; remove and dispose contaminated soil via licensed operators	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-61	Provide adequate portable sanitation facilities at maintenance sites	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
BIO-62	Store fuels and hazardous substances in labelled, secure, watertight containers in designated areas	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-63	Avoid washing/maintenance of machinery on site; if unavoidable, ensure no soil contamination	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-64	Comply with all requirements of the PPCP and Emergency Preparedness Response Plan	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-65	Prohibit vegetation disturbance outside defined maintenance boundaries	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-66	Restrict movement of personnel and vehicles to designated access routes; avoid natural habitats	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-67	Limit entry of non-project vehicles (e.g. via signage) to reduce spread of invasive/ruderal species	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-68	Use existing access roads wherever possible and base new/temporary access points on existing routes	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-69	Raise awareness among staff regarding invasive plant species	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-70	Monitor invasive species regularly during operation and update control plans if needed; monitoring by qualified botanist	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-71	Avoid maintenance activities during evening and night-time (after 22:00)	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-72	Minimise turbine and site lighting to aviation safety requirements and use appropriate lighting types to avoid attracting insects, birds, and bats	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
BIO-73	Avoid attracting birds through waste or predictable food sources	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-74	Train maintenance staff and contractors in environmental procedures	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-75	Enforce prohibition of hunting, trapping, poisoning, or disturbance of fauna; report incidents to authorities	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-76	Restrict vehicle traffic to approved routes and low speeds (20 km/h) to reduce fauna mortality and disturbance	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-77	Prohibit burning of vegetation during operation	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-78	Implement an Automated Shut-down-on-Demand (SDoD) system (e.g. IdentiFlight®) using camera-based detection	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-79	Install and operate an advanced detection system (4K + thermal cameras with AI algorithms) to identify bird species, track movements, and automatically trigger turbine slowdown/shutdown, minimising unnecessary curtailment	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-80	Paint one turbine blade (where approved) to reduce bird collision risk, acknowledging limited evidence	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-81	Install Bird Flight Diverters (BFDs) on all overhead lines and guyed masts; maintain and replace them as needed throughout project life	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-82	Ensure bird-safe pole design through consultation with an avifaunal specialist; final design to be specialist-approved	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
BIO-83	Insulate overhead transmission line components (supports and conductors) to reduce electrocution risk	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-84	Implement bird Post-construction Fatality Monitoring (PCFM) throughout the project lifetime	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-85	Apply adaptive management based on monitoring results	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-86	Apply bat-specific mitigation: minimise lighting and use appropriate light types to avoid insect attraction	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-87	Apply turbine operational mitigation for bats, including blade feathering throughout the project lifespan	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-88	Shut down turbines during low wind speeds (<6 m/s) and high bat activity periods, in line with permit requirements	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-89	Conduct bat activity monitoring at least every five years using acoustic detectors on turbines	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-90	Implement bat Post-construction Fatality Monitoring (PCFM) throughout the project lifetime	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
BIO-91	Apply adaptive management for bat impacts based on monitoring results	Mitigation	Biodiversity	Operation	Project Company	During operations	Biodiversity Management Plan
SOC-01	Develop and implement a Livelihood Restoration Plan (LRP) aligned with IFC PS5/EBRD PR5	Mitigation	Livelihood	Construction	Project Company	Before construction	Livelihood Restoration Plan
SOC-02	Ensure appropriate disclosure of information and consultation with affected people, including advance notice of construction activities and temporary access restrictions.	Mitigation	Livelihood	Construction	Project Company	During construction	Stakeholder Engagement Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
SOC-03	Identify and agree alternative access routes with affected land users and minimize the duration of any blockage.	Mitigation	Livelihood	Construction	Project Company	During construction	Stakeholder Engagement Plan
SOC-04	Identify all formal and informal land users prior to land entry and ensure compensation for any temporary loss of land use or agricultural subsidies.	Mitigation	Livelihood	Construction	Project Company	Before and during construction	Livelihood Restoration Plan
SOC-05	Compensate crop damage caused by construction activities or access tracks, based on the value of crops and duration of impact.	Mitigation	Livelihood	Construction	Project Company	Before and during construction	Livelihood Restoration Plan
SOC-06	Operate the Community Grievance Mechanism to address accidental damage claims and access-related issues during construction.	Mitigation	Livelihood	Construction	Project Company	During construction	Stakeholder Engagement Plan
SOC-07	Restore, at a minimum, the livelihoods and standards of living of affected persons to pre-project levels, in accordance with the LRP.	Mitigation	Livelihood	Construction	Project Company	End of construction	Livelihood Restoration Plan
SOC-08	Restore temporarily occupied land to its original agricultural condition after construction activities.	Mitigation	Livelihood	Construction	Project Company	Before and during construction	Livelihood Restoration Plan / Stakeholder Engagement Plan
SOC-09	Pay particular attention to vulnerable groups and provide special or supplementary assistance where required.	Mitigation	Livelihood	Construction	Project Company	Before and during construction	Stakeholder Engagement Plan
SOC-10	Ensure the LRP includes an Accidental Damage Compensation Procedure to guide compensation for accidental damage during construction	Mitigation	Livelihood	Construction	Project Company	Before and during construction	Livelihood Restoration Plan
SOC-11	Coordinate with relevant authorities (e.g., APIA) to ensure temporary land use restrictions do not lead to penalties or loss of agricultural subsidies.	Mitigation	Livelihood	Construction	Project Company	Before and during construction	Livelihood Restoration Plan / Stakeholder Engagement Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
SOC-12	Maintain physical and administrative demarcation of the permanent footprint and safety buffer zones to avoid unnecessary access restrictions.	Mitigation	Livelihood	Operation	Project Company	During operations	Operation ESMP
SOC-13	Ensure long-term communication with landowners and land users on any operational activities that may affect access or land use	Mitigation	Livelihood	Operation	Project Company	During operations	Stakeholder Engagement Plan
SOC-14	Monitor the status of affected livelihoods during operation and implement corrective measures if negative trends or access constraints are identified.	Mitigation	Livelihood	Operation	Project Company	During operations	Livelihood Restoration Plan / Stakeholder Engagement Plan
SOC-15	Provide continued support to vulnerable households identified through the LRP where long-term impacts persist	Mitigation	Livelihood	Operation	Project Company	During operations	Livelihood Restoration Plan / Stakeholder Engagement Plan
SOC-16	Ensure the Community Grievance Mechanism remains accessible for land and livelihood-related concerns during operation.	Mitigation	Livelihood	Operation	Project Company	During operations	Stakeholder Engagement Plan
SOC-17	Apply the compensation provisions defined in the LRP (including the Accidental Damage Compensation Procedure) whenever the eligibility criteria are met.	Mitigation	Livelihood	Operation	Project Company	During operations	Livelihood Restoration Plan
SOC-18	Support programs to enhance productivity of residual land for affected households, in line with livelihood restoration objectives.	Mitigation	Livelihood	Operation	Project Company	During operations	Livelihood Restoration Plan
SOC-19	Conduct periodic monitoring and evaluation of operational impacts and mitigation effectiveness to ensure ongoing protection of livelihoods.	Mitigation	Livelihood	Operation	Project Company	During operations	Livelihood Restoration Plan / Stakeholder Engagement Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
SOC-20	Implement transparent recruitment procedures, clearly disclosing job profiles, selection criteria, and qualification requirements.	Enhancement	Employment	Construction	Project Company	Before construction	Labour Management Plan
SOC-21	Provide workers with written documentation of labour rights, including hours, overtime, and benefits.	Enhancement	Employment	Construction	Project Company	Before construction	Labour Management Plan
SOC-22	Prioritize local hiring by advertising job opportunities widely within the Social AoI.	Enhancement	Employment	Construction	Project Company	Before construction	Labour Management Plan
SOC-23	Provide vocational and on-the-job training to strengthen local workforce skills.	Enhancement	Employment	Construction	Project Company	Before construction	Labour Management Plan
SOC-24	Promote inclusive hiring, ensuring access for women, youth, and vulnerable groups.	Enhancement	Employment	Construction	Project Company	Before construction	Labour Management Plan
SOC-25	Implement the Construction Labour and Working Conditions Management Plan, covering workforce needs, labour rights, and the Worker's Code of Conduct.	Enhancement	Employment	Construction	Project Company	Before construction	Labour Management Plan
SOC-26	Ensure regular communication with communities, providing clear information on employment opportunities and timelines through the SEP.	Enhancement	Employment	Construction	Project Company	Before construction	Stakeholder Engagement Plan
SOC-27	Maintain an accessible Workers' Grievance Mechanism throughout recruitment and employment.	Enhancement	Employment	Construction	Project Company	During construction	Stakeholder Engagement Plan
SOC-28	Encourage local procurement by contractors, prioritizing SMEs and women-led businesses.	Enhancement	Employment	Construction	Project Company	Before construction	Labour Management Plan
SOC-29	Disclose procurement opportunities early within the AoI and provide clear information on requirements	Enhancement	Employment	Construction	Project Company	Before construction	Labour Management Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
SOC-30	Engage with local suppliers to identify capacity needs and support their participation where feasible.	Enhancement	Employment	Construction	Project Company	Before construction	Labour Management Plan
SOC-31	Promote the use of local services (e.g., catering, transport, accommodation) during construction.	Enhancement	Employment	Construction	Project Company	Before construction	Labour Management Plan
SOC-32	Maintain a grievance mechanism accessible for procurement and economic related concerns	Enhancement	Employment	Construction	Project Company	During construction	Stakeholder Engagement Plan
SOC-33	Ensure transparent and timely payment of all applicable local taxes and operational fees to the relevant councils	Enhancement	Employment	Operation	Project Company	During operations	Operation ESMP
SOC-34	Maintain regular communication with local authorities regarding expected annual contributions and operational milestones	Enhancement	Employment	Operation	Project Company	During operations	Operation ESMP
SOC-35	Engage local councils through the SEP to explain the nature and predictability of tax-related revenues during operation	Enhancement	Employment	Operation	Project Company	During operations	Stakeholder Engagement Plan
SOC-36	Maintain a responsive communication channel for local authorities regarding administrative or fiscal queries related to the Project.	Enhancement	Employment	Operation	Project Company	During operations	Stakeholder Engagement Plan
SOC-37	Develop a targeted training program based on project needs and workforce skill gaps	Enhancement	Education	Construction / Operation	Project Company	Before construction	Labour Management Plan
SOC-38	Provide technical, H&S and environmental training to all workers	Enhancement	Education	Construction / Operation	Project Company	Before construction	Labour Management Plan
SOC-39	Promote on-the-job learning and knowledge transfer from experienced staff	Enhancement	Education	Construction / Operation	Project Company	During construction	Labour Management Plan
SOC-40	Prioritize training opportunities for local workers and vulnerable groups	Enhancement	Education	Construction / Operation	Project Company	Before construction	Labour Management Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
SOC-41	Monitor and document training delivered by the Project and its contractors	Enhancement	Education	Construction / Operation	Project Company	During construction	Labour Management Plan
SOC-42	Assess the capacity of local public services (healthcare, waste management, water supply, transport) prior to construction	Mitigation	Infrastructure and public services	Construction	Project Company	Before construction	Community Health and Safety Plan / Stakeholder Engagement Plan
SOC-43	Coordinate with relevant local authorities to manage potential pressure on public services generated by the incoming workforce	Mitigation	Infrastructure and public services	Construction	Project Company	During construction	Community Health and Safety Plan / Stakeholder Engagement Plan
SOC-44	Ensure workers are housed without affecting local community access to services	Mitigation	Infrastructure and public services	Construction	Project Company	Before construction	Community Health and Safety Plan / Traffic Management Plan
SOC-45	Ensure that worker accommodation has its own utilities, waste management, and basic services to avoid burdening municipal systems	Mitigation	Infrastructure and public services	Construction	Project Company	During construction	Community Health and Safety Plan
SOC-46	Develop and enforce a Traffic Management Plan to minimize pressure on local roads and transport infrastructure	Mitigation	Infrastructure and public services	Construction	Project Company	During construction	Traffic Management Plan
SOC-47	Provide on-site facilities (e.g., first aid, sanitation, drinking water, waste disposal) to reduce reliance on local services.	Mitigation	Infrastructure and public services	Construction	Project Company	During construction	Community Health and Safety Plan
SOC-48	Establish site rules and conduct training to ensure responsible use of local infrastructure by non-local workers	Mitigation	Infrastructure and public services	Construction	Project Company	During construction	Labour Management Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
SOC-49	Maintaining engagement with local councils and service providers throughout construction to monitor emerging pressures and adjust measures as needed.	Mitigation	Infrastructure and public services	Construction	Project Company	During construction	Stakeholder Engagement Plan
SOC-50	Minimize reliance on local housing through project-managed accommodation	Mitigation	Infrastructure and public services	Construction	Project Company	During construction	Community Health and Safety Plan
SOC-51	Provide project-managed worker accommodation (camp or leased facilities) to avoid competition with local residents	Mitigation	Infrastructure and public services	Construction	Project Company	During construction	Community Health and Safety Plan
SOC-52	Monitor local rental markets to detect price increases or displacement risks during construction	Mitigation	Infrastructure and public services	Construction	Project Company	During construction	Stakeholder Engagement Plan
SOC-53	Communicate clearly to contractors which accommodation options are approved and restrict uncontrolled renting in sensitive areas.	Mitigation	Infrastructure and public services	Construction	Project Company	During construction	Stakeholder Engagement Plan
SOC-54	Prioritize local hiring to limit the number of non-local workers entering the Social AoI.	Mitigation	Community H&S	Construction	Project Company	During construction	Labour Management Plan
SOC-55	Enforce a Workers' Code of Conduct covering behavioural expectations, cultural sensitivity and zero tolerance for violence or harassment.	Mitigation	Community H&S	Construction	Project Company	During construction	Labour Management Plan
SOC-56	Implement a Community Health, Safety and Security Management Plan including measures to prevent the spread of communicable diseases (e.g., hygiene, sanitation, health education, infection control protocols).	Mitigation	Community H&S	Construction	Project Company	During construction	Community Health and Safety Plan
SOC-57	Ensure proper waste management and sanitation in worker accommodation to prevent disease transmission	Mitigation	Community H&S	Construction	Project Company	During construction	Waste Management Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
SOC-58	Maintain a grievance mechanism accessible to community members to report concerns related to workers behaviour or influx impacts.	Mitigation	Community H&S	Construction	Project Company	During construction	Stakeholder Engagement Plan
SOC-59	Establish dedicated safeguards for Vulnerable Groups, including tailored awareness and a confidential reporting channel.	Mitigation	Community H&S	Construction	Project Company	During construction	Community Health and Safety Plan
SOC-60	Consult and coordinate with relevant civil and military aviation authorities to ensure compliance with air traffic safety regulations.	Mitigation	Community H&S	Operation	Project Company	During operations	Operation ESMP
SOC-61	Equip all WTGs with aviation-compliant anti-collision lighting and marking systems	Mitigation	Community H&S	Operation	Project Company	During operations	Operation ESMP
SOC-62	Regularly inspect and maintain anti-collision lighting to ensure continuous functionality	Mitigation	Community H&S	Operation	Project Company	During operations	Operation ESMP
SOC-63	Ensure turbine locations and heights are registered and communicated through official aviation channels	Mitigation	Community H&S	Operation	Project Company	During operations	Operation ESMP
SOC-64	Provide worker accommodation that meets the IFC PS2 and national standards (space, ventilation, sanitation, potable water, waste management, food safety)	Mitigation	Labour	Construction	Project Company	During construction	Community Health and Safety Plan
SOC-65	Ensure defining minimum living standards, hygiene requirements and maintenance procedures)	Mitigation	Labour	Construction	Project Company	During construction	Labour Management Plan
SOC-66	Conduct regular inspections of all accommodation facilities, including those managed by subcontractors.	Mitigation	Labour	Construction	Project Company	During construction	Labour Management Plan
SOC-67	Guarantee equal accommodation standards for migrant and subcontracted workers	Mitigation	Labour	Construction	Project Company	During construction	Labour Management Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
SOC-68	Maintain a confidential workers' grievance mechanism for accommodation-related concerns.	Mitigation	Labour	Construction	Project Company	During construction	Stakeholder Engagement Plan
SOC-69	Implement the Project's Human Resources Policy, which will outline the Project Developer's commitment to ensuring labour rights, good working conditions and equal treatment for all individuals.	Mitigation	Labour	Construction	Project Company	Before construction	Human Resource Policy or similar / Contractor Management Plan
SOC-70	Require all supply chain partners to comply with a Supplier Code of Conduct, including prohibitions on forced, compulsory, or exploitative labour practices.	Mitigation	Labour	Construction	Project Company	During procurement	Supplier Code of Conduct or similar Contractor Management Plan
SOC-71	Screen contractors and suppliers through pre-contract due diligence, focusing on H&S performance, labour practices, and compliance with international standards.	Mitigation	Labour	Construction	Project Company	During procurement	Contractor Management Plan
SOC-72	Include specific H&S and labour obligations in all procurement contracts, supported by regular monitoring and performance checks.	Mitigation	Labour	Construction	Project Company	During procurement and construction	Contractor Management Plan
SOC-73	Ensure indirectly employed workers have access to the Workers' Grievance Mechanism to safely and confidentially report health, safety, or labour-related concerns.	Mitigation	Labour	Construction	Project Company	During construction	Labour Management Plan / Stakeholder Engagement Plan
VIS-01	Limit vegetation clearance and topsoil removal strictly to the required work footprint.	Mitigation	Landscape and Visual	Construction	EPC Contractor	During construction	Construction ESMP
VIS-02	Shape temporary earthworks with smooth, natural profiles to reduce noticeable edges or scars.	Mitigation	Landscape and Visual	Construction	EPC Contractor	During construction	Construction ESMP

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
VIS-03	Restore vegetation immediately after construction activities.	Mitigation	Landscape and Visual	Construction	EPC Contractor	During construction	Construction ESMP
VIS-04	Consider implementing small-scale landscape compensation projects such as green areas, scenic paths or upgraded public spaces, prioritising locations with highest significance visual exposure.	Mitigation	Landscape and Visual	Operation	Project Company	During operations	Operation ESMP
VIS-05	Engage with local communities through clear communication and agreed local benefits, supporting minor infrastructure or public services.	Mitigation	Landscape and Visual	Operation	Project Company	During operations	Operation ESMP
SH-01	A refined shadow flicker assessment shall be undertaken for the most exposed receptors (e.g. R63, R64 and nearby receptors), incorporating more realistic input parameters such as site-specific meteorological data (including cloud cover), wind direction frequency, turbine operational characteristics, and receptor-specific factors (e.g. window orientation and local screening).	Mitigation	Shadow Flickering	Operation	Project Company	Before operations	Operation ESMP
SH-02	Provide a dedicated grievance mechanism and reporting system able to monitor closely through engagement with residents during the operational phase, where there are predicted impacts from shadow flickers	Mitigation	Shadow Flickering	Operation	Project Company	During operations	Stakeholder Engagement Plan / Operation ESMP
SH-03	Based on the type of grievances collected, specific on-site verification of shadow flickering will be conducted and tailored mitigation measures adopted: assess presence of natural visual screening; if not sufficient, consider technological visual screening; turbine control strategies may also be applied	Mitigation	Shadow Flickering	Operation	Project Company	During operations	Stakeholder Engagement Plan
ICE-01	Provide a dedicated grievance mechanism and reporting system able to monitor closely through engagement with residents during the operational	Mitigation	Ice Throw	Operation	Project Company	During operations	Stakeholder Engagement Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
	phase, where there are predicted impacts from ice throw						
ICE-02	In a situation where a risk to the public or operational staff due to ice throw is believed to exist, implement physical and visual warnings (fences, warning signs) at least one rotor diameter from the turbine in all directions and at entrance points to the facility	Mitigation	Ice Throw	Operation	Project Company	During operations	Emergency Preparedness and Response Plan
ICE-03	Implement modern turbine control systems for cold-climate configurations (e.g., Smart Icing detection, automated operational adjustments) to allow the turbine to pause or modify rotor speed when ice accretion is detected	Mitigation	Ice Throw	Operation	Project Company	Before construction	Emergency Preparedness and Response Plan
ICE-04	Maintain adequate setback distances	Mitigation	Ice Throw	Operation	Project Company	During operations	Operation ESMP
ICE-05	Consider to include cold-climate and anti-icing features, such us heated wind sensors and active de-icing systems, to help preventing ice formation and ensures reliable operation of critical components	Mitigation	Ice Throw	Operation	Project Company	Before construction	Emergency Preparedness and Response Plan
ES-01	Rehabilitate all temporarily disturbed areas (e.g., temporary access tracks, laydown areas, work zones) immediately after construction, using methods that support natural vegetation regeneration and soil stabilization.	Mitigation	Ecosystem Services	Construction	EPC Contractor	End of construction	Construction ESMP
ES-02	Maintain ongoing engagement between the Project and local communities, with communities informed in advance of any vegetation clearing to allow pre-harvesting of resources such as building materials or other useable resources.	Mitigation	Ecosystem Services	Construction	Project Company	During construction	Stakeholder Engagement Plan
ES-03	Apply livelihood-related mitigation measures, including preparation of the Livelihood Restoration Plan (LRP)	Mitigation	Ecosystem Services	Construction	Project Company	During construction	Livelihood Restoration Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
ES-04	The LRP will include an entitlement matrix for all affected land users and an Accidental Damage Compensation Procedure to address unintentional damage during construction and operation.	Mitigation	Ecosystem Services	Construction	Project Company	During construction	Livelihood Restoration Plan
TMP-01	Implement a Traffic Management Plan (TMP) defining routing, scheduling, speed limits and safety procedures for all construction traffic.	Mitigation	Traffic	Construction	EPC Contractor	Before and during construction	Traffic Management Plan
TMP-02	Coordinate delivery schedules with local authorities and plan oversized shipments during non-peak hours or at night where safe.	Mitigation	Traffic	Construction	EPC Contractor	During construction	Traffic Management Plan
TMP-03	Communicate regularly with communities about expected traffic levels and timing of oversized deliveries	Mitigation	Traffic	Construction	EPC Contractor	During construction	Traffic Management Plan / Stakeholder Management Plan
TMP-04	Train drivers on safe driving and project-specific traffic rules along community routes	Mitigation	Traffic	Construction	EPC Contractor	Before and during construction	Traffic Management Plan
TMP-05	Deploy traffic control measures such as signage, warning signals and marshals at critical points	Mitigation	Traffic	Construction	EPC Contractor	During construction	Traffic Management Plan
TMP-06	Stagger truck movements and avoid queuing on public roads near site access points	Mitigation	Traffic	Construction	EPC Contractor	During construction	Traffic Management Plan
TMP-07	Monitor traffic conditions during construction and adjust TMP measures as needed	Mitigation	Traffic	Construction	EPC Contractor	During construction	Traffic Management Plan
TMP-08	Obtain all required road permits and complete any temporary road adjustments or reinforcements needed for oversized deliveries before use.	Mitigation	Traffic	Construction	EPC Contractor	Before construction	Traffic Management Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
TMP-09	Survey the condition of all planned haul routes prior to construction and share findings with the relevant road authorities.	Mitigation	Traffic	Construction	EPC Contractor	Before construction	Traffic Management Plan
TMP-10	Implement temporary road improvements where needed (e.g., shoulder reinforcement, temporary surface protection, widening for turning radii) in coordination with authorities	Mitigation	Traffic	Construction	EPC Contractor	Before construction	Traffic Management Plan
TMP-11	Coordinate with national road authorities (the Romanian National Road Infrastructure Company, or CNAIR) to identify and restore damage to national, county and communal roads used for heavy deliveries.	Mitigation	Traffic	Construction	EPC Contractor	During construction	Traffic Management Plan
TMP-12	Install road signage for new or upgraded public-access roads built for the Project, as required by local road authorities	Mitigation	Traffic	Construction	EPC Contractor	During construction	Traffic Management Plan
TMP-13	Restore all street furniture (signs, lights, barriers) removed or affected by oversized load movements.	Mitigation	Traffic	Construction	EPC Contractor	During construction	Traffic Management Plan
TMP-14	Develop a post-construction road maintenance schedule (together with local authorities) for roads within and around the Project area during wind farm operation.	Mitigation	Traffic	Construction	EPC Contractor	End of construction	Traffic Management Plan
TMP-15	Include road safety measures within the Traffic Management Plan (TMP), covering truck routes, transport hours, signage, community notification and safety communication.	Mitigation	Traffic	Construction	EPC Contractor	Before and during construction	Traffic Management Plan
TMP-16	Obtain all required road permits and complete any road alterations, bypasses or temporary reinforcements needed for oversized load movements before construction traffic begins.	Mitigation	Traffic	Construction	EPC Contractor	Before construction	Traffic Management Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
TMP-17	Select safe routes for both oversized and standard loads, prioritizing roads with adequate width, turning radii and load-bearing capacity	Mitigation	Traffic	Construction	EPC Contractor	Before construction	Traffic Management Plan
TMP-18	Schedule heavy and oversized vehicle movements outside school hours, community events and peak traffic periods	Mitigation	Traffic	Construction	EPC Contractor	Before and during construction	Traffic Management Plan
TMP-19	Implement community information campaigns to announce oversized deliveries, road closures, safety risks and traffic timing	Mitigation	Traffic	Construction	EPC Contractor	During construction	Traffic Management Plan / Stakeholder Management Plan
TMP-20	Establish and enforce driver and vehicle safety standards, including: Mandatory training and accreditation for project and contractor drivers, driver fitness requirements (rest periods. Zero alcohol/drug tolerance), use of in-vehicle monitoring systems for speed and location tracking, vehicle maintenance and safety checks, load stability requirements for oversized cargo	Mitigation	Traffic	Construction	EPC Contractor	Before and during construction	Traffic Management Plan
TMP-21	Maintain and implement a simplified Traffic Management Plan for routine O&M visits and occasional heavy-truck movements.	Mitigation	Traffic	Operation	Project Company	Before and during operations	Traffic Management Plan
TMP-22	Carry out regular inspections and maintenance of internal Project roads and any improved local agricultural roads used during operations.	Mitigation	Traffic	Operation	Project Company	During operations	Traffic Management Plan
TMP-23	Coordinate with local authorities when exceptional heavy deliveries or major component replacements require temporary traffic control measures	Mitigation	Traffic	Operation	Project Company	During operations	Traffic Management Plan / Stakeholder Management Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
ARCH-01	A Chance Find Procedure (CFP) will be implemented for unexpected discoveries occurring outside formally supervised areas	Mitigation	Archaeology	Construction	EPC Contractor	Before and during construction	Chance Find Procedure
ARCH-02	All contractors involved in excavation, grading or trenching will receive induction on cultural heritage sensitivity, legal obligations and reporting requirements.	Mitigation	Archaeology	Construction	EPC Contractor	Before construction	Chance Find Procedure
ARCH-03	Regular communication will be maintained with cultural authorities and affected landowners regarding supervised excavation areas, archaeological sensitivities and procedures to follow in case of finds.	Mitigation	Archaeology	Construction	EPC Contractor	During construction	Chance Find Procedure
ARCH-04	Dust control: apply water spraying and enforce low-speed limits on unpaved roads to reduce dust deposition on exposed heritage features.	Mitigation	Archaeology	Construction	EPC Contractor	During construction	Pollution Prevention and Control Plan
ARCH-05	Access management: maintain access routes to cultural heritage sites; provide temporary detours only when essential.	Mitigation	Archaeology	Construction	EPC Contractor	During construction	Chance Find Procedure
ARCH-06	All ground-disturbing activities (foundations, cable trenches, access roads, excavation, grading) must be continuously monitored by a licensed archaeologist under a valid supervision contract (Specific Requirements of the Cultural Permit - Aviz, February 2025)	Mitigation	Archaeology	Construction	EPC Contractor	During construction	Chance Find Procedure
ARCH-07	Where construction monitoring identifies significant archaeological remains, the archaeological supervision contract shall be immediately converted into a preventive archaeological research contract, allowing systematic excavation, documentation and salvage, as required by national legislation. (Specific Requirements of the Cultural Permit - Aviz, February 2025).	Mitigation	Archaeology	Construction	EPC Contractor	During construction	Chance Find Procedure

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
ARCH-08	Upon completion of construction works, a final archaeological supervision report shall be submitted to the Constanța County Directorate for Culture, documenting all findings, compliance actions and outcomes. (Specific Requirements of the Cultural Permit - Aviz, February 2025).	Mitigation	Archaeology	Construction	EPC Contractor	During construction	Chance Find Procedure
ARCH-09	Prior to the commencement of construction works, the developer shall maintain a valid contract with a certified archaeological institution for archaeological supervision and, where required, further preventive archaeological research. (Specific Requirements of the Cultural Permit - Aviz, February 2025).	Mitigation	Archaeology	Construction	EPC Contractor	During construction	Chance Find Procedure
ARCH-10	Preventive archaeological investigations shall be undertaken during the execution phase for Turbine WT80 and for access roads and infrastructure corridors that could not be investigated during previous phases due to active agricultural use, in accordance with the Culture Permit requirements. (Specific Requirements of the Cultural Permit - Aviz, February 2025).	Mitigation	Archaeology	Construction	EPC Contractor	During construction	Chance Find Procedure
ARCH-11	In the event that significant archaeological complexes or structures are discovered during construction monitoring, works shall immediately cease in the affected area. The Project design shall be adapted, in consultation with the competent cultural heritage authorities, to ensure the preservation of archaeological remains in situ wherever feasible. (Specific Requirements of the Cultural Permit - Aviz, February 2025).	Mitigation	Archaeology	Construction	EPC Contractor	During construction	Chance Find Procedure
ARCH-12	Construction planning shall take into account sensitive periods associated with religious activities (e.g., major religious holidays, funerary events, and	Mitigation	Archaeology	Construction	EPC Contractor	During construction	Construction ESMP

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
	local commemorative practices) where feasible, in coordination with local stakeholders						
ARCH-13	Temporary construction-related disturbances will be managed with the standard mitigation measures for noise, dust, and traffic to avoid unnecessary disruption to access routes serving active religious and cultural sites, particularly during peak visitation periods	Mitigation	Archaeology	Construction	EPC Contractor	During construction	Pollution Prevention and Control Plan / Traffic Management Plan
ARCH-14	Construction contractors will be required to respect the cultural and social function of these receptors and to avoid obstruction of access to cemeteries, churches, and places of worship	Mitigation	Archaeology	Construction	EPC Contractor	During construction	Construction ESMP
ARCH-15	Structured stakeholder engagement shall be implemented with custodians and users of intangible cultural heritage receptors identified within the AoI, including representatives of monasteries, parish churches, and cemetery administrations	Mitigation	Archaeology	Construction	EPC Contractor	During construction	Stakeholder Engagement Plan
UE-01	Conduct task-specific H&S training (heights, lifting, electrical, first aid, emergency response)	Mitigation	Unplanned Events	Construction	Project Company	During construction	Occupational Health and Safety Plan
UE-02	Enforce correct PPE use for all construction activities	Mitigation	Unplanned Events	Construction	Project Company	During construction	Occupational Health and Safety Plan
UE-03	Implement Emergency and Prepardness Response Plan for traffic accidents	Mitigation	Unplanned Events	Construction	Project Company	During construction	Emergency Preparedness and Response Plan
UE-04	Implement Waste Management Plan including segregation, storage, labelling, and disposal	Mitigation	Unplanned Events	Construction	Project Company	During construction	Waste Management Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
UE-05	Implement fuel and chemical spill prevention and response (bunded storage, handling procedures, spill kits)	Mitigation	Unplanned Events	Construction	Project Company	During construction	Pollution Prevention and Control Plan
UE-06	Fire prevention measures (emergency squad, evacuation plan, PPE, smoking control)	Mitigation	Unplanned Events	Construction	Project Company	During construction	Emergency Preparedness and Response Plan
UE-07	Implement natural hazard monitoring and shutdowns during extreme events	Mitigation	Unplanned Events	Construction & Operation	Project Company	During project lifetime	Emergency Preparedness and Response Plan
UE-08	Blade and transmission line safety measures (inspections, buffers, predictive maintenance, SCADA monitoring)	Mitigation	Unplanned Events	Construction & Operation	Project Company	During project lifetime	Occupational Health and Safety Plan
CI-01	Implement habitat enhancement (hedgerows, buffer strips, small-scale foraging areas) to offset cumulative land loss	Mitigation	Cumulative Impacts Birds and Bats	Construction & Operation	Project Company	During construction and operation	Biodiversity Management Plan
CI-02	Implement species-specific operational mitigation (curtailment during high-risk periods)	Mitigation	Cumulative Impacts Birds and Bats	Operation	Project Company	Ongoing	Biodiversity Management Plan
CI-03	Coordinate (where feasible) with other developers on landscape design principles (e.g. micro-siting consistency, colour treatment, screening approaches)	Mitigation	Cumulative Impacts Landscape and Visual	Construction	Project Company	Pre-construction	Stakeholder Engagement Plan
CI-04	Encourage planning of construction schedules to avoid unnecessary overlap of peak labour demand across nearby renewable energy projects	Mitigation	Cumulative Impacts Employment	Construction	Project Company	Pre-construction	Labour Management Plan / Corporate Social Responsibility Plan
CI-05	Promote the use of local labour and subcontractors where available, and support local workforce capacity through engagement with training institutions	Mitigation	Cumulative Impacts Employment	Construction	Project Company	Pre-construction	Labour Management Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
CI-06	Where feasible, exchange information with other renewable energy developers on workforce needs and subcontracting opportunities to improve labour allocation efficiency and reduce competition-driven cost pressure	Mitigation	Cumulative Impacts Employment	Construction	Project Company	Pre-construction / Construction	Stakeholder Engagement Plan
CI-07	Engage with other project developer during the disclosure or before construction to get information regarding construction schedules in order to develop a coordinated traffic management plan, including shared delivery windows, optimized routing, and cumulative impact awareness for contractors.	Mitigation	Cumulative Impacts Traffic	Construction	EPC Contractor	Pre-construction	Stakeholder Engagement Plan
CI-08	Establish frequent (i.e., monthly or other appropriate interval), regularly scheduled meetings between other developers and local traffic management authorities to address any problems that arise during the construction period and ensure measures to minimize disruption for road users and provide for road safety are consistently implemented.	Mitigation	Cumulative Impacts Traffic	Construction	EPC Contractor	Construction	Traffic Management Plan / Stakeholder Engagement Plan
CI-09	Coordinate with other projects (where relevant) to avoid overlapping construction and reduce cumulative visual disturbance where feasible	Mitigation	Cumulative Impacts Archaeology and Cultural Heritage	Construction	EPC Contractor	During construction	Stakeholder Engagement Plan
CI-10	Each developer shall maintain archaeological supervision during all ground-disturbing works, with workers trained on cultural heritage sensitivity and the Chance Find Procedure (CFP). A communication protocol is recommended in order to allow sharing discoveries among neighboring projects to support awareness and prevent uncoordinated impacts.	Mitigation	Cumulative Impacts Archaeology and Cultural Heritage	Construction	EPC Contractor	During construction	Chance Finds Procedure / Stakeholder Engagement Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
CI-11	It is encouraged to establish an open communication channel with other developers to share information on discoveries, discuss potential cumulative impacts, and align mitigation efforts where overlapping zones exist. Ongoing stakeholder engagement will be maintained with local communities and authorities, including the use of a grievance mechanism to capture and address concerns related to cultural heritage and landscape perception.	Mitigation	Cumulative Impacts Archaeology and Cultural Heritage	Construction	EPC Contractor	During construction	Stakeholder Engagement Plan
CI-12	Monitor energy generation and share performance data to support regional climate and decarbonization strategies	Mitigation	Cumulative Impacts Climate	Operation	Project Company	Annual	Corporate Social Responsibility Plan
CI-13	Implement standard noise and dust mitigation measures	Mitigation	Cumulative Impacts Noise and Air Quality	Construction	EPC Contractor	During construction	Pollution Prevention and Control Plan
CI-14	Coordinate with other developers to identify overlapping high-intensity construction phases (dust/noise-generating activities)	Mitigation	Cumulative Impacts Noise and Air Quality	Construction	EPC Contractor	During construction	Stakeholder Engagement Plan
HR-01	Implement mandatory age-verification and forbid employment of minors	Mitigation	Human Rights	Pre-construction & Construction	Project Company + Contractors	Before hiring and during Project lifetime	Labour Management Plan
HR-02	Ensure transparent, voluntary recruitment and prohibit retention of documents to prevent forced labour	Mitigation	Human Rights	Pre-construction & Construction	Project Company + Contractors	At recruitment	Labour Management Plan / Supplier Code of Conduct / Contractor Management Plan
HR-03	Integrate modern slavery clauses into contracts and conduct supplier due diligence, esp. high-risk suppliers	Mitigation	Human Rights	Construction & Operation	Project Company Procurement	Before hiring and during Project lifetime	Supply Chain Due Diligence Procedure / Contractor Management Plan

ID	Commitment	Type	Reference ESIA	Project Phase	Responsible	Timescale	Management Plan
HR-04	Provide mandatory training on human rights, non-discrimination, conduct and reporting channels	Mitigation	Human Rights	Construction & Operation	Project Company + Contractors	At recruitment	Labour Management Plan
HR-05	Implement OHS procedures, PPE provision and high-risk work training	Mitigation	Human Rights	Construction	Project Company + Contractors	During project lifetime	Occupational Health and Safety Plan
HR-06	Monitor working hours and maintain verified time records to ensure compliance with Romanian law	Mitigation	Human Rights	Construction & Operation	Project Company + Contractors	During project lifetime	Labour Management Plan
HR-07	Apply anti-discrimination measures and ensure equal opportunities	Mitigation	Human Rights	Construction & Operation	Project Company	During project lifetime	Labour Management Plan
HR-08	Operate a confidential, accessible, non-retaliatory worker grievance mechanism	Mitigation	Human Rights	Pre-construction, Construction & Operation	Project Company	Before construction and during Project lifetime	Stakeholder Engagement Plan
HR-09	Maintain an accessible community grievance mechanism with transparent resolution process	Mitigation	Human Rights	Entire project lifecycle	Project Company	During project lifetime	Stakeholder Engagement Plan
HR-10	Train all security personnel on human rights, de-escalation and proportionate use of force	Mitigation	Human Rights	Pre-construction & Construction	Project Company + Contractors	Before construction and during Project lifetime	Labour Management Plan
HR-11	Conduct audits of contractors, subcontractors and working conditions	Mitigation	Human Rights	Construction & Operation	Project Company	Quarterly during Project lifetime	Labour Management Plan
HR-12	Ensure fair remuneration, salary transparency and monitor gender pay equity	Mitigation	Human Rights	Construction & Operation	Project Company	During project lifetime	Labour Management Plan
HR-13	Safeguard freedom of association and prevent retaliation against worker representatives	Mitigation	Human Rights	Construction & Operation	Project Company + Contractors	During project lifetime	Labour Management Plan
HR-14	Implement responsible site security practices, including incident reporting	Mitigation	Human Rights	Construction & Operation	Project Company + Contractors	During project lifetime	Labour Management Plan
HR-15	Provide clear communication on worker rights, policies, and grievance mechanisms	Mitigation	Human Rights	Construction & Operation	Project Company	Before hiring and during Project lifetime	Stakeholder Engagement Plan

APPENDIX C MONITORING PLAN

Construction Phase Indicative Monitoring Plan

Topic	Parameter / Indicator	Method & Frequency	Evidence / Records	Responsibility
Occupational Health & Safety (H&S)	LTIFR, TRIR; near-misses; toolbox talks; safety violations; emergency drills; training hours	Daily inspections; weekly H&S checks; monthly reporting; emergency drills twice/year	Inspection checklists; incident reports; training records; drill reports	EPC Contractor (lead), Project Company (oversight)
Workforce & Labour Conditions	Total working hours; number of workers; local hires; worker turnover; labour grievances; accommodation inspections	Daily attendance logs; monthly HR report; quarterly accommodation inspections	HR records; access logs; grievance register	EPC Contractor; Project Company
Waste Management	Waste volumes by type; segregation rate; recycling rate; number of waste non-compliances; waste contractor licenses	Weekly inspections; monthly waste inventory; quarterly internal audit	Waste manifests; storage checklists; audit reports	EPC Contractor; Project Company
Pollution Prevention – Air	Dust generation; watering frequency; dust complaints	Daily site checks; monthly reporting	Inspection forms; complaint log	EPC Contractor
Pollution Prevention – Noise	Noise levels at receptors; noise complaints	Monthly measurement; incident-based checks	Noise monitoring reports; complaints log	EPC Contractor
Water and Soil Protection	Water consumption; spills; chemical/fuel storage integrity; bunding capacity	Weekly inspections; monthly reporting; spill incident reporting	Spill logs; inspection reports; utility bills	EPC Contractor
Resource Use (Water, Fuel, Electricity)	Water consumed; diesel consumed; electricity use; estimated CO_2 emissions	Monthly resource report	Fuel purchase records; meter readings	EPC Contractor
Traffic	Heavy vehicle movements; TMP compliance; traffic incidents; road condition	Daily monitoring; weekly reporting; monthly TMP review	Traffic logs; GPS data (if available); incident reports	EPC Contractor; Project Company

Topic	Parameter / Indicator	Method & Frequency	Evidence / Records	Responsibility
Biodiversity	Vegetation & habitat condition (incl. % cover of invasive alien species)	Monthly habitat inspections	Monthly Environmental Report	EPC Contractor
	Wildlife activity & disturbance	Bi-weekly walkover transects; daily spot-checks by site teams during peak clearance periods	Monthly Environmental Report	EPC Contractor
	Nesting bird checks (seasonal)	Weekly during nesting season, prior to vegetation clearance and during sensitive periods	Monthly Environmental Report	EPC Contractor
	Bat activity	Monthly evening activity checks during warmer months; weekly checks on lighting compliance (light spill, shielding)	Monthly Environmental Report	EPC Contractor
	Road traffic & wildlife interactions	Daily checks of construction roads for tracks, fatalities, or disturbance	Daily inspection checklist; action records	EPC Contractor
Archaeology	Daily archaeological supervision; CFP activations; number of workers trained; compliance with Cultural Permit; final report	Continuous monitoring during excavations; monthly reports; end-of-works final report	Supervisor daily logs; training sheets; authority communications	Licensed archaeologist + EPC Contractor; Project Company
Community Health, Safety & Security (CHSS)	Community grievances; traffic-related complaints; public safety incidents; signage compliance	Weekly CHSS inspections; monthly reporting	CHSS checklists; grievance register	EPC Contractor; Project Company
Stakeholder Engagement and Grievances	No. of grievances; resolution time; meetings with landowners / authorities	Weekly grievance review; monthly engagement report	Grievance database; meeting minutes	Project Company (lead); EPC Contractor for construction-related issues

Topic	Parameter / Indicator	Method & Frequency	Evidence / Records	Responsibility
Unplanned Events Preparedness	Fire incidents; spill incidents; extreme weather stoppages; ERP compliance	Monthly summary; incident-based reporting	ERP logs; drill reports	EPC Contractor; Project Company

Operational Phase Indicative Monitoring Plan

Topic	Parameter / Indicator	Method & Frequency	Evidence / Records	Responsibility
O&M Occupational Health & Safety	TRIR, LTIFR; contractor safety compliance; turbine access permits; LOTO procedures	Monthly inspections; quarterly H&S audits	O&M H&S records; training logs	Project Company
Biodiversity	Bird & bat mortality: carcass searches; collision hotspots.	Systematic carcass searches within 100 m radius from the turbine axis using standardized transects; and scavenger removal corrections: Monthly/seasonal surveys; Annual biodiversity report	Survey sheets; carcass logs; SCADA curtailment data	Project Company + Ecologist
	Flight paths, altitude, migration timing	Visual vantage point surveys and/or radar/thermal cameras during migration seasons; weekly during peak migration periods	Observation logs; radar/acoustic data	Project Company + Ecologist
	Raptors/Scavengers: Observation of perching/feeding behavior on turbines and substations	Quarterly and Annual monitoring report	Field notes and log ;photos	Project Company + Ecologist
	Bact activity	Monthly during spring/summer seasons; intensified during evenings	Observation logs; radar/acoustic data	Project Company + Ecologist
	Nesting on Infrastructure	Visual inspections of turbines and electrical infrastructures; quarterly and pre-breeding season	Inspection forms; photos and GPS points	Project Company + Ecologist
	Bird electrocution risk	Pole-top inspections at high-risk designs; quarterly	Field notes and log, photos	Project Company + Ecologist

Topic	Parameter / Indicator	Method & Frequency	Evidence / Records	Responsibility
	Biodiversity Monitoring report regarding the implementation of impact reduction measures	Annually, by the end of January for the previous reporting yea	Presented in both raw/tabular format and graphical form (mapping all collected data); dated photos	Project Company
Shadow Flicker	Hours of flicker at receptors; complaints; mitigation effectiveness	Annual model update if applicable after complaints; complaint-based site checks	Complaint log; flicker monitoring	Project Company
Operational Noise	Noise levels at receptors; noise complaints	Annual noise measurements; incident-based monitoring	Noise reports; complaints log	Project Company
Blade Throw Risk Monitoring	Overspeed events; vibration anomalies; SCADA turbulence data; blade inspection records	Continuous SCADA monitoring; monthly maintenance reports	SCADA logs; inspection reports	Project Company
Resource Use (Operation)	Electricity produced; water used; lubricants/oils consumed; CO_2 emissions avoided	Monthly O&M resource report; annual sustainability summary	Meter readings; waste oil manifests	Project Company
Waste Management (O&M)	Waste oils; replaced components; hazardous waste compliance	Monthly monitoring; annual audit	Waste manifests; disposal certificates	Project Company
Community Health, Safety & Security	Community grievances; public access management; maintenance traffic impacts	Monthly monitoring	CHSS logs; grievance register	Project Company
Cultural Heritage (Post-construction obligations)	Submission of final archaeological report; compliance with any remaining permit requirements	One-off submission; annual check	Report to Cultural Directorate	Project Company
Cumulative Impacts Coordination	Participation in regional wildlife networks; traffic coordination; data sharing	Annual coordination activities	Meeting minutes; shared reports	Project Company


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