# ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

## "RECONSTRUCTION OF THE ROAD ERSEKA – LESKOVIK"

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| | |
|---|---|
| ALL | Albanian Lek |
| ADF | Albanian Development Fund |
| ARAP | Abbreviated Resettlement Action Plan |
| BMP | Biodiversity Management Plan |
| BAT | Best Available Techniques |
| CSR | Corporate Social Responsibility |
| CAT | Corrective Action Trackers |
| EBRD | European Bank for Reconstruction and Development |
| EIA | Environmental Impact Assessment |
| EMF | Environmental Management Framework |
| ESFD | Environmental and Social Framework Document |
| ESMF | Environmental and Social Management Framework |
| ESMP | Environmental and Social Management Plan |
| ESIA | Environmental and Social Impact Assessment |
| ESMS | Environmental and Social Management System |
| ESCH | Environmental Social and Cultural heritage |
| EU | European Union |
| GOA | Government of Albania |
| MOE | Ministry of Environment |
| MTI | Ministry of Transport and Infrastructure |
| NEA | National Environmental Agency |
| NOs | Nitrogen Oxides |
| OP | Operational Procedure |
| PAP | Project Affected People |
| PM | Particulate Matter |
| PR | Performance requirements |
| RAP | Resettlement Action Plan |
| REA | Regional Environmental Agency |
| VOCs | Volatile Organic Compounds |

# 1. GENERAL INFORMATION

## 1.1. Project overview

The Erseke-Leskovik road starts in the town of Erseka and ends in the town of Leskovik. The starting point of this segment is in the place called the city cemetery (end of the Erseka town ring) and ends at the entrance of the town of Leskovik (at the intersection with the new road segment Leskovik-Customs 3 Bridges). The road has a length of about 42 km and is presented with strong and smooth curves throughout its length.From the town of Erseka to Borove extendsa relatively flat-hilly terrain. The curves in this area are mostly smooth. From Borova to Leskovik lies a hilly-mountainous terrain. Even the curves in this segment are relatively smooth.

The width of the asphalt, along the entire length of the road is about 4m, with a transverse slope on both sides of the road. On most of the road there are embankments and canals for surface water drainage. From the field observations made by the group of engineers and from the measurements of the group of topographers, damages of different degrees have been noticed in this segment. Based on the condition of the layers in this road segment, the damages are divided into 4 types:

**1- No damage**

The layers are in good condition and there is no need for intervention in the layers

**2- Slight damage (Damage only to the asphalt layer or asphalt and binder)**

The upper layers of the road are damaged or worn, but the deep layers are in good condition

**3- Medium damage (In addition to the asphalt layers, the stabilizer is also damaged)**

**4- Deep damage (new layers are needed)**

In this case the whole road package is damaged or we are displaced from the existing road trail.

The main objective of the project: "Reconstruction of Erseka - Leskovik road" is to improve regional and cross-border connectivity and facilitate accessibility to the tourism potentials of the Përmet region, bringing the expansion of the region's tourism offer and increasing opportunities for sustainable regional economic development . The reconstruction project will aim to improve the quality and safety of traffic while maintaining the existing road trail.

In total, the proposed interventions in the project will be:

- Construction of asphalt layers of the existing road
- Construction of substrates (in layers with major damage);
- Road drainage solution;
- Construction of retaining walls;
- Construction of culvert and works of art on the street;
- Vertical and horizontal signage Etc.

The Erseke-Leskovik connecting road starts in the town of Erseka and ends in the town of Leskovik. The reconstruction project will aim to improve the quality and safety of traffic while maintaining the existing road trail. Consequently, it will expand the region's tourism offer and increase the opportunity for sustainable regional economic development.

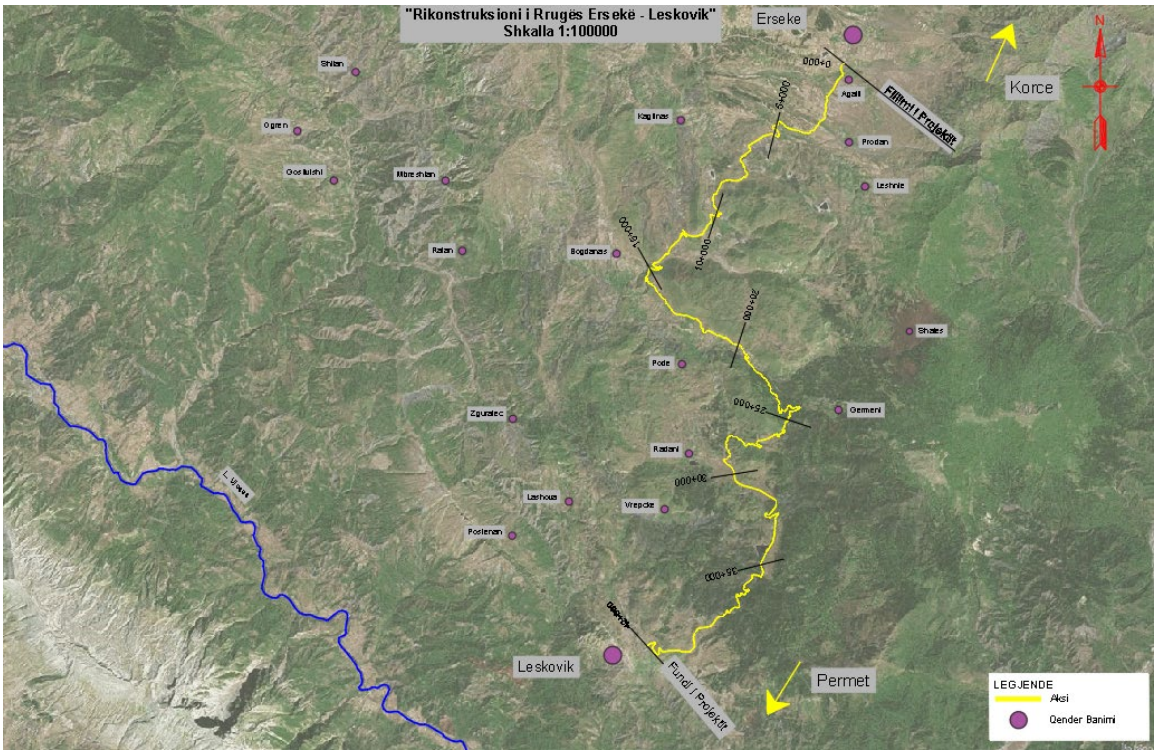


*Figure 1:General Road Plan*

The length of the road axis is 42,660m. The width of the road asphalt varies between 4 and 4.5.

| | |
|---|---|
| Width of asphalt road 4.0m | 1. Km 10+120 – 12+394<br>2. Km 15+790 – 42+660 |
| Width of asphalt road 4.5m | 3. Km 0+000 – 10+120<br>4. Km 12+394 – 15+790 |

The main part of the road reconstruction project: "Erseka-Leskovik" consists of interventions in the road layers. Throughout the length, the axis trail is the same as the existing road trail.

Based on the damage of the existing road, the interventions have been divided into different types of layers.

| | |
|---|---|
| Type 1 of layers | 3cm asphalt |
| Type 2 of layers | 3cm asphalt<br>5cm binder |
| Type 3 of layers | 3cm asphalt<br>5cm binder<br>20 cm stabilizer |
| Type 4 of layers | 3cm asphalt<br>5cm binder<br>20 cm stabilizer<br>30 cm gravel |

## 1.2. About this document

The purpose of the ESMP is to ensure that social and environmental impacts, risks and liabilities identified in ESIA are effectively managed during the construction, operation and closure of the proposed project "Reconstruction of Erseka - Leskovik road".

The ESMP specifies the mitigation, adaptation, prevention and management measures to which the Proponent is committed and shows how the Project will mobilize organizational capacity and resources to account for the factors evaluated in order to implement the compiled measures. The ESMP also shows how mitigation and management measures will be scheduled.

The ESMP is a live document for project activities that will be updated as and when required. The ESMP acts as a quick guide for Contractors and project implementers to enhance positive impacts and eliminate or minimize the occurrence of negative impacts through proposed mitigations measures. The ESMP relies on the following key principles:

**Compliance with national and international laws**. The project will empower individuals and groups, to realize their rights and interests, and to ensure that they fully participate throughout the development and implementation of projects.

**Transparency and inclusivity.** The project development team will engage in meaningful and transparent consultation with affected communities, particularly with vulnerable groups, to ensure that they can participate in a free, prior and informed manner in decisions about avoiding or managing environmental or social impacts.

**Systematic assessment and tracking of environmental and social impacts and risks.** The project will aim at providing clear and constructive responses to individuals, groups, and communities potentially affected by projects on potential grievances related to the social and environmental performance of the projects, corrects non-compliance where it has occurred, and shares the results of its review and any actions taken.

**Harmonization with other projects and programs**. The project will aim at maximizing efficiency and minimizing costs in complying with environmental and social safeguards.

The key objectives of the ESMP are:

- To identify the proper measures for mitigations of possible impacts from the proposal
- To ensure that resources are used in appropriate and efficient way
- To propose reduction measures or evade analyzed impacts
- To monitor and keep impacts under control
- To outline mitigation measures against the possible degradation of the areas;
- To enhance positive aspects brought by the project;
- To ensure that the programme will comply with relevant environmental legislation of Albania and other requirements throughout its preconstruction, construction, operation and decommissioning phases;
- To identify roles and responsibilities and the cost involved;
- To propose mechanisms for monitoring compliance;
- To provide adequate channels of input for the different stakeholders throughout the project activity;
- To establish proven mechanisms to correct/adjust the findings resulting from the monitoring activity and to include the input received throughout the project activity.

# 2. POLICY, LEGAL AND ADMINISTRATIVE FRAMEWORK

## 2.1. National legal framework

**National /Albanian Environmental Legal and Policy Framework**

The legal framework for Environmental Protection in the Republic of Albania is in line with EU standards.

According to the law no. 10440 "On Environmental Impact Assessment", article 8, this project requires "Preliminary Environmental Impact Assessment", according to Annex 2; point 10 "Infrastructure projects" Letter (d) Construction of roads, ports and port installations, including fishing ports (projects that are not included in Annex I).

Summary of legal and institutional framework:

Environmental legislation is built to protect and prevent special and important components of environment. So, the most specific related to the Project are mentioned following:

*Table 1:Overview of the environmental legal framework*

| Legal framework | |
|---|---|
| Law No.10 431 dated 9.6.2011 | On Environmental Protection |
| Law No. 10 440 dated 07.07.2011 | On Environmental Impact Assessment |
| Law No. 10 448 dated 14.07.2011 | On Environmental Permits |
| Law No.9362 dated 24.03.2005 | On Plant Protection Services |
| Law No.10463 dated 22.09.2011 | On Integrated Waste Management |
| Law No.8897 dated 16.05.2002 | On Air Protection from Pollution |
| Law No.9587, dated 20.07.2006 | On Biodiversity Protection |
| Law No.8906, dated 6.6.2002 | On Protected Areas<br>Amended as per law No.9868, dated 04.02.2008 |
| Law No. 9774 dated 12.07.2007 | For environmental noise management |
| Law No.107/2014 dated 31.07.2014 | On territorial planning and development changed with Law no. 73/2015 date 09.7.2015 " For some extensions and amendments in Law no 107.2014 "On territorial Planning and development"" |
| The Albanian Parliament has approved some laws on behalf of the country inclusion in various protocols and agreements. Such as: | |
| Law No. 9672 dated 26.10.2000 | On ratification of Aarhus Convention for the public right to access information, public participation in decision-making and access to justice in environmental matters |
| Law no . 9334, date 16.12.2004 | For the accession of the Republic of Albania to the Kyoto Protocol to the Convention on Climate Change (UNFC). |

| | |
|---|---|
| Law no. 9048, Date 07.04.2003 | On "Cultural Heritage" Amended. This law aims to declare and protect Cultural Heritage in the territory of Albanian Republic. |
| Decisions of Council of Ministers | |
| DCM No. 714 dated 06.11.2019 | "For some additions and changes in the decision of the Council of Ministers no. 686, dated 29.7.2015 'on the approval of the rules, responsibilities and deadlines for the development of the environmental impact assessment procedure (EIA) and the procedure of transfer of the environmental decision and declaration' ", as amended |
| DCM No. 686, dated 07.29.2015 | On approval of the rules, responsibilities and timelines for the development of the procedure of environmental impact assessment (EIA) and procedures for the transfer of the decision of the Environmental Statement. |
| DCM No. 912, dated 11.11.2015 | On approval of national methodology for Environmental Impact Assessment process |
| DCM 587 date 7.07.2010 | On monitoring and control of noise level in urban and touristic zones |
| DCM No. 676, dated 20.12.2002 | On the proclamation of Albanian natural monuments |
| DCM No.804, dated 4.11.2003 | On the approval of the Albanian flora species list put under protection |
| DCM No. 177, dated 31.3.2005 | On allowed norms for liquid emissions and zoning criteria on receiver water environments |
| DCM No.435 date 12.09.2002 | On the approval of Norms of Air Emissions in the Republic of Albania |
| DCM No 434 dated 08.06.2016 | "On the Rules for submitting the Request, Maintaining and Completing the Technical Documentation, Criteria and Procedures for Reducing the Area and Volume of the Forest Fund", |
| DCM No.803, dated 4.12.2003 | On air quality standards |
| DCM No.994, dated 02.07.2008 | On public opinion collection on environmental decision-making |
| DCM Nr. 271, dated 6.4.2016 | "For some amendments and additions to decision no. 408, dated 13.5.2015, of the Council of Ministers, "On the adoption of the Territorial Development Regulation", as amended. |
| DCM Nr. 408, dated 13.5.2015 | "On the approval of regulation for territorial development" |
| DCM. Nr. 671, dated 29.7.2015 | "On the approval of the regulation of territorial planning" |
| DCM Nr. 502, dated 13.7.2011 | "On the aproval of uniform regulation for territorial development control |
| **Guidelines and Regulations** | |
| Directive No 1037 /1 dated 12/04/ 2011 | On evaluation and management of environmental noise |

| | |
|---|---|
| Directive no. 8, dated 27.11.2007 | For noise levels at certain environments |
| Directive no. 6527, dated 24.12.2004 | On the permissible values of air pollutants in the environment by emissions of gases and noise caused by road vehicles and ways to control them. |

**National Social Legal and Policy Framework**

The Albanian Government main social support program is the financial economic assistance supported by Law No. 9355 (10/03/2005) on "Social Assistance and Services" and its Decision No 787 (14/12/2005).

For social assistance services Law No. 9232 (13/05/2004) concerns "The Social Programs aimed at Housing the Inhabitants of Urban Areas".

According to the Law No. 9355 on Social Assistance and Services, citizens of Albania are entitled to various forms of social welfare payments or a range of community based services (public and private). Community based services are still in the development stage and financial payments to beneficiaries largely prevail.

In the area of housing, the Law No. 9232 on Social Programs for the Housing of Inhabitants of Urban Zones establishes the legal framework for development of social housing programs in Albanian Municipalities. The law defines the administrative regulations and procedures that will ensure the planning, management and distribution of social housing to vulnerable people, in line with their income and the level of State support. The Council of Europe Development Bank is engaged with the Albanian Government in the development of a social housing program.

Albania has a set of laws under which vulnerable groups can be assisted to improve their living standards (health, education, employment, gender equality, free legal aid etc.) and these laws can be used as a basis for developing resettlement programs for vulnerable groups.

Employment Promotion: through the Ministry of Labour, Social Affairs and Equal Opportunities, the law envisages support for unemployed people through measures such as employment mediation, training and retraining with subsidized attendance fees as well as programs for new job creations (promotion of small businesses).

Expropriation Law and Regulations in Albania:

- The current Expropriation Law of the Republic of Albania is Law No. 8561 on "Expropriation and Temporary Takings of Private Property for a Public Interest" (Official Gazette of 22 December 1999). This law is complemented by:
- Decision no 7 ,dated 6.1.2020 "On The Conditions and Procedure for Expropriations and / or Exchange Of Property, for Public Interest, In Function of the Reconstruction Process"
- Decision of Council of Ministers (DCM) No. 127 (23/03/2000) on the "Content and procedures of introducing the request and of initial announcement of expropriation and temporary takings of private property for a public interest";
- DCM No. 138 (23/03/2000) on "The technical criteria for the assessment and calculation of the compensation amount of private properties that are going to be expropriated for a public interest, of properties that are devaluated and of the rights of the third parties" and amendments No 662 (18/12/2002), No 872 (12/12/2007) and No 136 (23/02/2011);
- DCM No. 257 (11/04/2007) on "The criteria and procedures for the physical compensation with state properties of expropriated subjects, in special cases";

- Guideline No. 1 (05/10/2000) on the "Technical criteria to calculate the value of the fruit trees that are being expropriated for public interest, in the cases when indicators of declared purchase are missing";
- Other laws on land tenure rights and registration and on social protection are to be considered and are mentioned below in the relative chapters.

## 2.2. EBRD requirements (EBRD Environmental and Social Policy)

Environmental and Social Policy: Approved by the Board of Directors, at its meeting of May 7, 2014.

The European Bank for Reconstruction and Development (EBRD) is committed to promoting "sustainable and environmentally friendly development" throughout its range of investment and technical cooperation activities, pursuant to the EBRD Founding Agreement.

The Bank believes that environmental and social sustainability is a fundamental aspect of achieving results in line with its transition mandate and confirms that projects promoting environmental and social sustainability enjoy the highest priority in its activities.

Performance requirements (PR):

The projects are expected to meet good international practice regarding environmental and social sustainability. Specific performance criteria for the areas of environmental and social sustainability are as follows:

- PR 1 Assessment and Management of Environmental and Social Risks and Impacts
- PR 2 Labour and Working Conditions
- PR 3 Resource Efficiency and Pollution Prevention and Control
- PR 4 Health, Safety and Security
- PR 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
- PR 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources
- PR 7 Indigenous Peoples
- PR 8 Cultural Heritage
- PR 9 Financial Intermediaries
- PR 10 Information Disclosure and Stakeholder Engagement

As per EBRD standard the projects are classified in project of category A,B or C.

Category A projects could result in potentially significant adverse future environmental and/or social impacts which cannot readily be identified or assessed and will require the client to carry out a comprehensive Environmental and Social Impact Assessment (ESIA). The ESIA process will include a scoping stage to identify the potential future environmental and social impacts associated with the project. The ESIA will include an examination of technically and financially feasible alternatives to the source of such impacts, including the non-project alternative, and document the rationale for selecting the particular course of action proposed. It will also identify potential improvement opportunities and recommend any measures needed to avoid, or where avoidance is not possible, minimize and mitigate adverse impacts.

The ESIA may need to be carried out or verified by independent experts. The ESIA process will also include a public disclosure and consultation process as specified in PR 10.

For Category B projects, where potential adverse future environmental and social impacts are typically site specific and/or readily identified and addressed through mitigation measures, the client will undertake an environmental and social assessment that is proportionate to the project's nature, size and location, as well as the characteristics of the potential impacts and risks. The assessment will characterize potential future adverse impacts associated with the project, identify potential improvement opportunities, and recommend any measures needed to avoid, or where avoidance is not possible, minimize and mitigate adverse impacts.

For Category A and B projects which involve existing facilities, an assessment of the environmental and social issues of past and current operations will be required. The purpose of this assessment is to identify potential risks, liabilities and opportunities associated with the existing facilities and operations, to confirm the current status of regulatory compliance and to assess the client's existing management systems and overall performance against the PRs. Any investigations of existing facilities must be carried out by experts that are independent from the facility that is being investigated.

For Category C projects, which are likely to have minimal or no adverse future environmental and social impacts and that are readily identified and addressed through mitigation measures, the client will implement an ESMS proportionate to the impacts and risks in accordance with paragraphs 14-22 of this PR and monitor and report on the project's compliance with the PRs as per paragraphs 23-28 of PR 1.

This project is not in the list categorized as type A projects.

Based on the technical project that will be implemented on the footprint of the existing road already built years ago, based on this project, the asphalt layer will be laid and the signage of the existing road will be installed, based on the environmental and social impacts that will have during the construction phase (of about 12 months) which are estimated to be minimal and easily addressed through mitigation measures.

## 2.3. Relevant institutions related to the project

Relevant Institutions related to the project are listed above:

- ADF (ALBANIAN DEVELOPMENT FOND)
- Ministry of Infrastructure & Energy
- Ministry of Tourism and Environment
- National Environmental Agency
- Ministry of Finance & Economy
- National Agency of Natural Resources
- National Territory Planning Agency
- National Tourism Agency
- Agency of Archaeological Services
- State Water Inspectorate
- Academic and Research Organizations interested
- Tourists agency
- The National Agency of Protected Areas and the Regional Administration of Protected Areas of Korca region
- Prefectures of Korca
- NAPA (National Agency for Protected Areas)
- Protection and Preservation of Natural Environment in Albania (PPNEA)
- Albanian Society for the Protection of Birds and Mammals (ASPBM)

- Albanian Ornithological Society (AOS)
- University of Tirana
- Institute of Nature Conservation
- NGO

Local Government Authorities:

- Municipality of Korca
- Municipality of Erseka
- Ersekë
- Qender Ersekë
- Leksovik
- Qender Leksovik
- Novosela
- Barmash
- Mollas
- Çlirim.

# 3. ENVIRONMENTAL AND SOCIAL BASELINE INFORMATION

## 3.1. Environmental Baseline Information

### Protected Areas and Natural Monuments

The case study is included in an urbanized territory, with the presence of infrastructure, which is related to complex agricultural and cultivation models. So there will be no impact on Protected Areas.

The data are collected based on the ASIG/Geoportal information. According the map, close the to road is located in the distance of 226 m the Protected Area of Managed Natural Resources – **Piskal Shqeri**. The Forest Unit "Piskal" is made of the watershed of the Langurica and Piskal lakes and of the Postenan, Radimisth and Pode rocks, as well as the Radum mountain surrounded by the Dermar, Rajan, Kamnik, Mbreshtan, Piskal, Vitish and Shijan villages. The area is made of valleys that fall down by the streams creating a 'micro relief' of a wide 'basin'. According IUCN management category is categorized under Category VI.

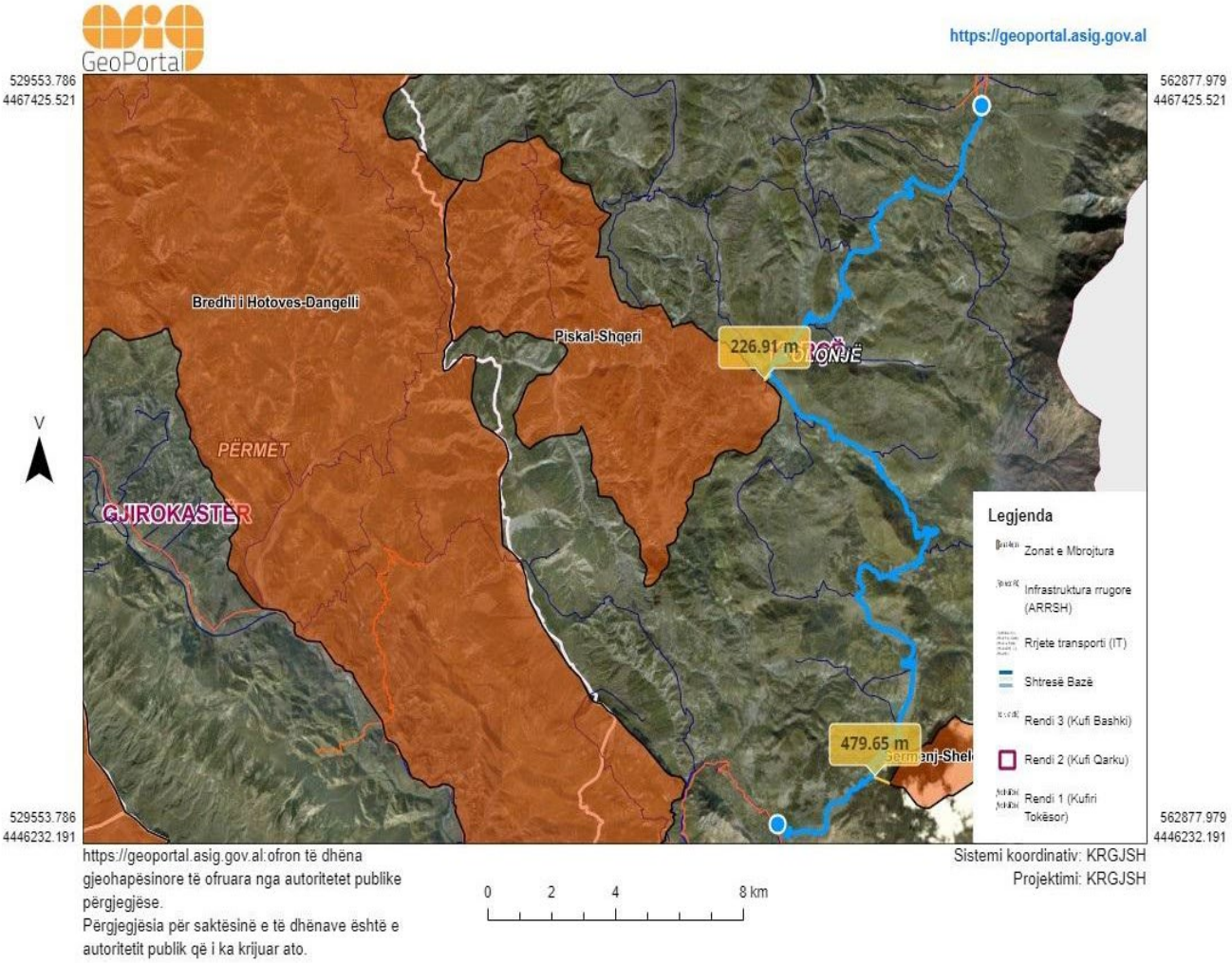


*Figure 2:Distance from Protected Areas*

In the distance of 479 m is located the natural reserve called **Germenj-Shelegur.** According IUCN management category is categorized under Category IV. The area is rich with biodiversity and endemic species.

The natural reserve **Germenj- Shelegur** has a surface of 430.0 ha. The natural ecosystem Gërmenj-Shelegur has been declared "Natural Reserve" according to DCM no. 102, dated 15.01.1996.

The boundaries of this "Natural reserve" are as follows:

- North: Quota 1337.0m (4471795.28L-4449740.49V) to quota 1503.0m (4472675.96-L4449514.98V);
- East: Quota 1503.0m (4472675.96L-4449514.98V), along the land border with Greece, quotas 1448.9m, 1521.5m, point with coordinates (4471818.13L - 444760.80V);
- South: Point with coordinates (4471818.13L-444760.80V) to point with coordinates (4469803.22L-4448105.79V);
- West: Point with coordinates (4469803.22L-4448105.79V), quota 1104.0m, up to quota 1337.0m (4471795.28L-4449740.49V).

Another protected area is located around the study area, but outside it: **The Fir of Hotovë-Dangëlli National Park.**

The Fir of Hotovë-Dangëlli National is the largest national park in Albania located in Gjirokastër County with a surface area of 34,361 ha (343.61 km2). The park takes its name from the Hotova Fir, which is considered one of the most important Mediterranean plant relics of the country. Although, it encompasses of hilly and mountainous terrain composed of limestone and sandstone deposits, with numerous valleys, canyons, gorges, rivers and dense deciduous and coniferous forests.

The International Union for Conservation of Nature (IUCN) has listed the park as Category II. The park also includes 11 natural monuments. The park rises over a very remote mountainous region of Nemërçka and Tomorr between the Vjosa Valley in the west, Leskovik in the south, Erseka in the southeast and the Osum Valley in the northeast. Close to Petran is the narrow and deep Lengarica Canyon with numerous caves and thermal springs such as Banjat e Bënjës. Within the boundaries of the park there are numerous villages including Frashër, which is well known located in the heart of the park. In terms of hydrology, Vjosa is the main river forming the western bound of the park, flowing through Përmet until discharging into the Adriatic Sea.

Due to its favorable ecological conditions and the mosaic distribution of various types of habitats, it is characterized by exceptionally rich and varied fauna. The forests are the most important habitats for mammals like wild cat, roe deer, wild boar, red squirrel, eurasian otter and badger. Brown bear, gray wolf and red fox can also be seen on the pastures deep inside the forest. The old growing trees throughout the park preserves a wide variety of bird species. Most notable amongst them are the golden eagle, eagle owl, barn owl, sparrowhawk, egyptian vulture, kestrel, lanner falcon and so on.

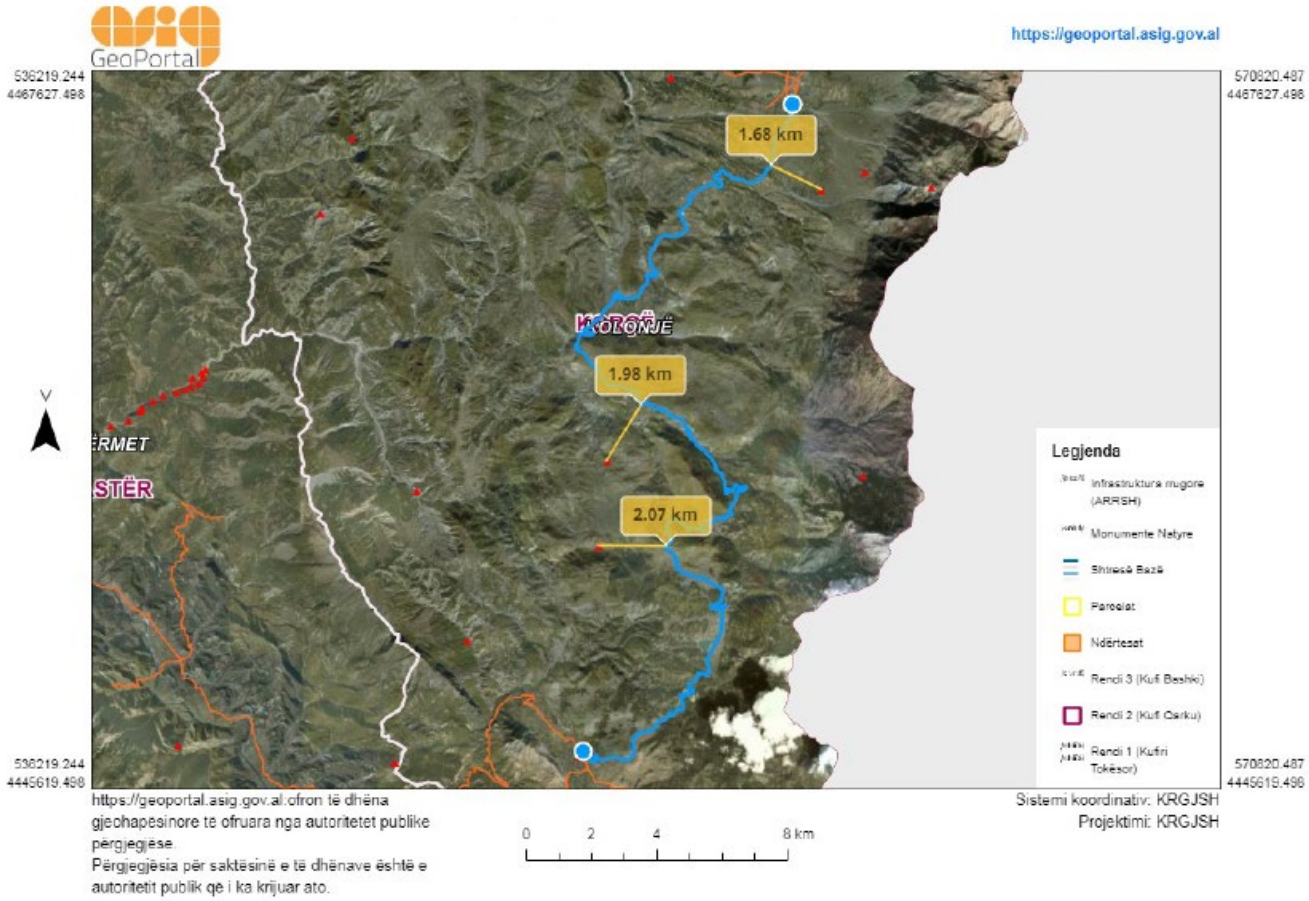


*Figure 3:Distance of natural monuments to the project footprint*

As it can be seen in the project footprint does not intersect any natural monument or protected area.

## Surface water

Along the road path are located few water reservours that are not negatively impacted from the road. From the map shown, the distances are different. The first reservour is located in the distance of 1.4 km, following the second reservour in the distance of 256 m and the last reservour is located in the distance of 22. 75 m.
Following are listed water resources near the project footprint:

- Stream of Grena
- Stream of Stomje
- Reservoir of Kabashi
- Stream of Kociu
- River of Poda
- River of Barmashi

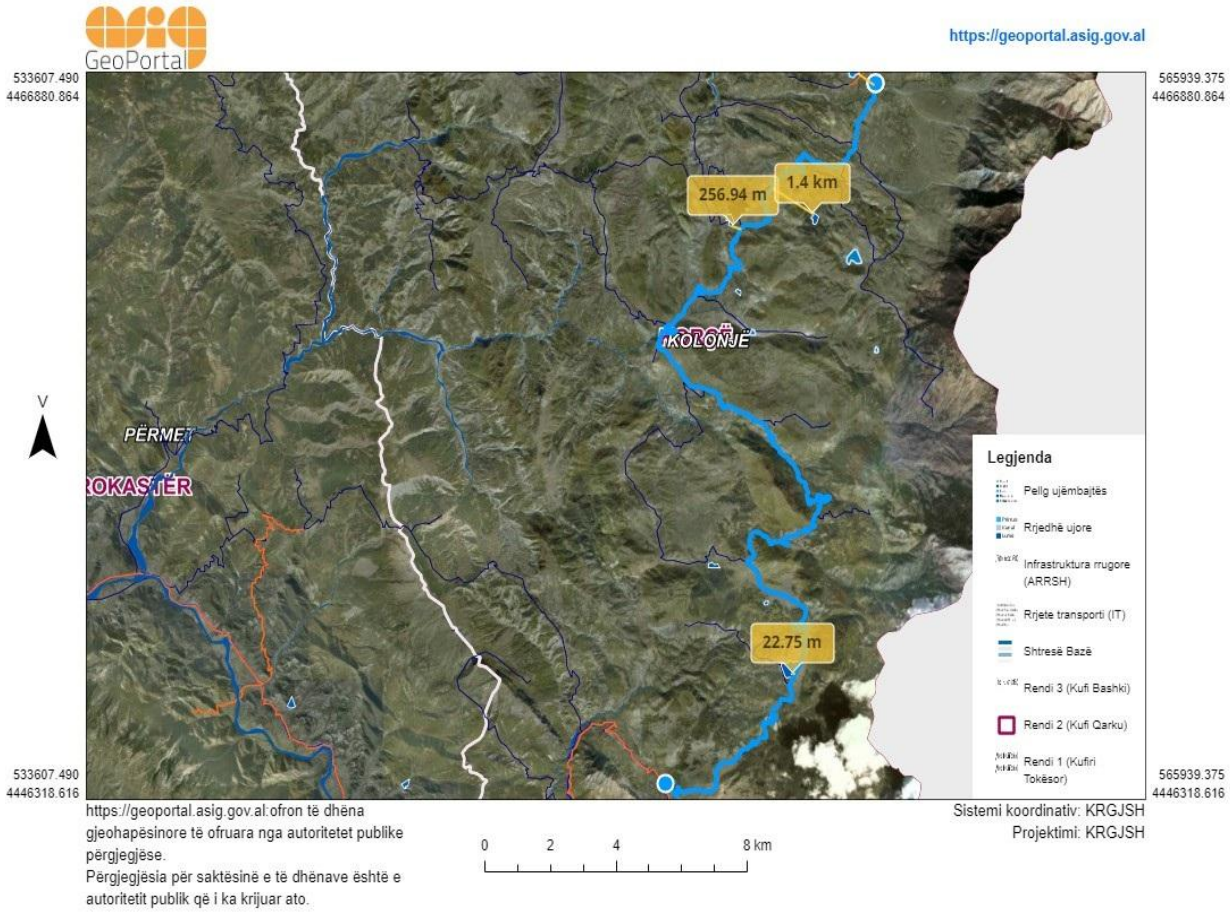


*Figure 4: Water sources related to the project area*

**Description of the vegetation cover of the area where the project is proposed to be implemented**

Since the asphalting of the road will be impelemented on an existing roadbed ,it clear there is no vegetation on the surface if the road bed ,so the assessment of vegetation impacted on the road bed is not applicable/relevante for this project as the road is in the condition where it was built the road bed up to the stabilizer layer and is planned as per this project asphalting and signage instalation .

As it is shown in the following pictures , there is no vegetation on the project footprint to be affected.

*Figure 5: Vegetation of the area where the project is proposed to be implemented (there is no vegetation on the project footprint)*

## 3.2. Information for inhabited centers in projects Zone

### Local administrative Unit of projects zone

The road segment starts in the town of Erseka and ends in the town of Leskovik. The starting point of this segment is in the place called the city cemetery (end of the Erseka town ring) and ends at the entrance of the town of Leskovik (at the intersection with the new road segment Leskovik-Customs 3 Bridges).
Beneficiary administrative units are: Ersekë, Qender Ersekë, Leksovik, Qender Leksovik, Novosela, Barmash, Mollas and Çlirim of Kolonja municipality.
The municipality of Kolonja is bordered on the north by the municipalities of Devoll and Korça, on the west and south by the municipality of Përmet, and on the east by Greece. The capital of the Municipality is the city of Erseka.
According to the 2011 Census, the municipality of Kolonja has 11,070 inhabitants, while according to the Civil Registry this municipality has a population of 19,919 inhabitants, in an area of 864.06 km2. The large difference between these figures can be explained by the migratory movement, which for this area has had quite large proportions, not yet reflected in the civil status registers. The Municipality of Kolonjë has a density of 7.5 inhabitants / km2 (several times lower than the national average: 97.4, due to the large area with mountainous area).

The current data of 2015 show for a total number of 22.2 thousand inhabitants and 6,343 families registered in the civil status, compared respectively with about 22.6 thousand inhabitants and 5005 families in 2000. The inhabited centers are located mainly at Gramoz and other surrounding mountains.
The town of Erseka lies almost in the center of the Kolonja Plateau, at the foot of Gramoz mountain with a distance of 2 km from its base and has an area of 1.1 km; 2,266 families and 6,726 inhabitants. The town of Leskovik, for 2015, numbered about 3 thousand inhabitants and 800 families. It seems that the decline in population, according to the registers, has slowed down after 2011, and there has even been an increase towards the levels before 15 years.
The gender ratio, according to the 2011 census data, turns out to be 104.2, slightly higher than the national average of 100.4, which can be partly explained by the higher phenomenon of female migration, mainly for further education and employment. . In the Municipality of Kolonjë, the age group 15-64 years constitutes 68.1% of the total population, being almost as much as the national average (68%), unlike the age group of children: 15.6% (national average 20%), which indicates a decline in fertility in recent decades.
The emigration of the population has been directed mainly abroad (proximity to Greece), but also to other cities of Albania (Korça, Tirana, etc.). The return of emigrants until 2011 has been negligible, about 510 people in total (0.36% of the total returned emigrants).

This municipality consists of 8 administrative units, which are:

- Ersekë
- Qender Ersekë
- Leksovik
- Qender Leksovik
- Novosela
- Barmash
- Mollas
- Çlirim.


*Figure 6: Administrative Unites part of the Municipality of Kolonja*

*Table 2: Administrative unites part of the Municipality of Kolonja, cities and villages*

| Region | Center of Municipality | Administrative units | Cities and villages under the jurisdiction of the municipality | Population as per Census 2011 | Population as per civil register | Surface KM² |
|---|---|---|---|---|---|---|
| Korca | City Kolonja | **Ersekë** | City Ersekë | 11,070 | 19,919 | 864.06 |
| | | **Qendër Ersekë** | Villages; Starie, Bejkovë, Psar, Selenicë, Kreshovë, Gostivisht, Lëngës, Kodras, Kabash, Borovë, Taç Qëndër, Taç Poshtë, Taç Lartë, Rehovë, Gjonç, Prodan | | | |
| | | **Leskovik** | City Leskovik | | | |
| | | **Qënder Leskovik** | Villages; Pobickë, Cerckë, Radat, Radovë, Postenan, Lashovë, Peshtan, Podë, Kovaçisht, Vrepckë, Gërmenj, Radanj, Glinë, Gjirakar | | | |
| | | **Novoselë** | Villages; Novoselë, Mesiçkë, Kagjinas, Zharkan, Piskal, Vitisht, Shijan, Kaduç, Ndërrmarr, Mbreshtan | | | |
| | | **Barmash** | Villages; Barmash, Leshnjë, Shalës, Gozhdorazhd, Sanjollas, Kamnik, Bënjëz, Radimisht, Arrëz, Rajan | | | |
| | | **Mollas** | Villages; Mollas, Skorovot, Qinam, Vodicë, Qafzez, Helmës, Shtikë, Pepellash, Butkë, Kozel, Milec, Bezhan, Boshanj, Blush | | | |
| | | **Çlirim** | Villages; Çlirim, Qesarak, Kaltanj, Qytezë, Selenicë e Pishës, Luaras, Lënckë, Kurtez, Orgockë, Qinam-Radovickë, Radovickë, Psar i Zi | | | |

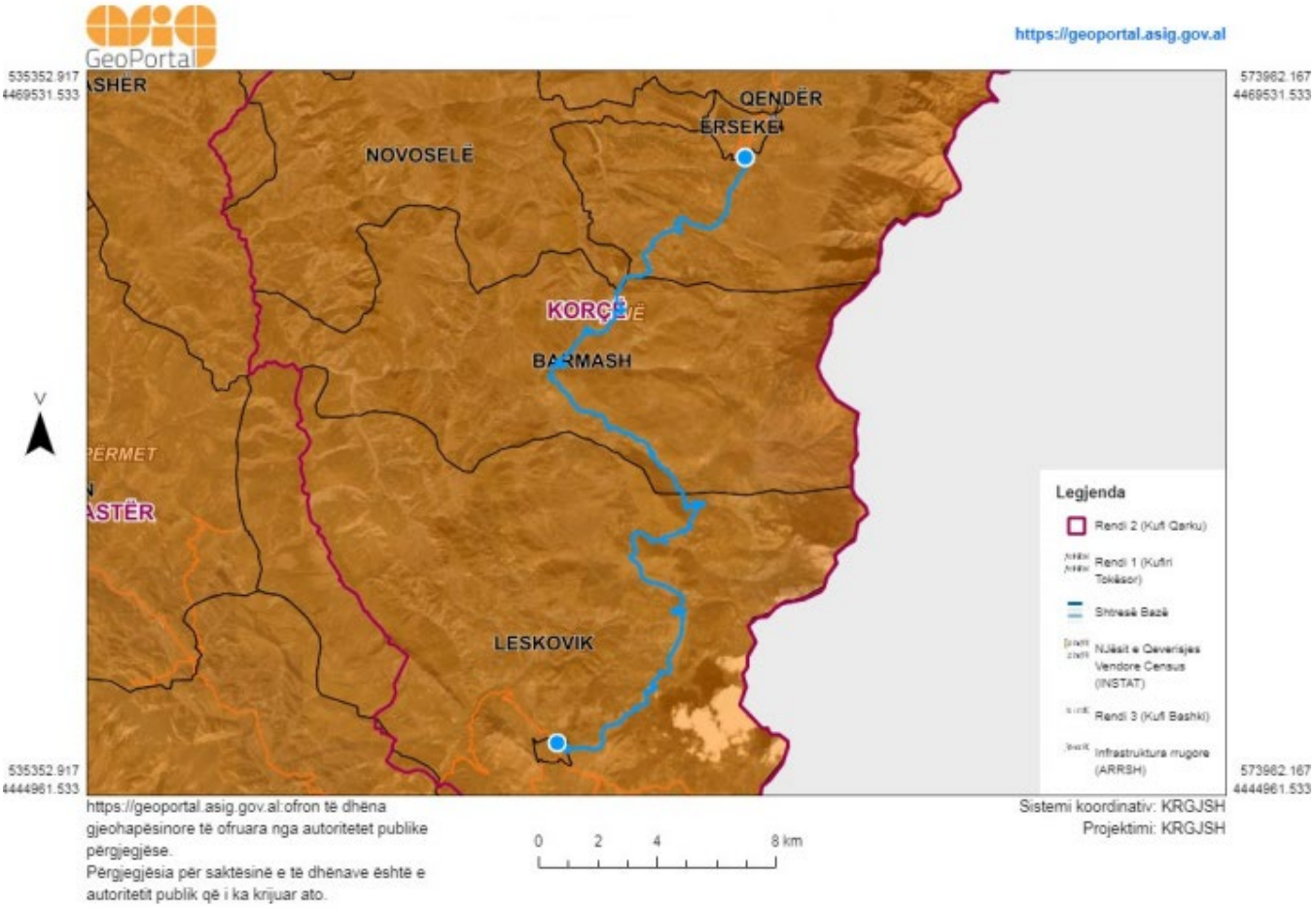


*Figure 7: Project Affected Administrative Units*

## Cultural Heritage

Referring to the presence of any monument or cultural heritage object in or near the project area, we confirm that there is no evidence that any cultural heritage or archeology monument has been recorded in or near the project area.

In the vicinity of the project area there are no cultural monuments whose values could be affected by the implementing of the project.

As per article 48, Law No. 9048 dated 07.04.2003 (amended): "If after starting works it may be discovered of traces or objects with archeological-ethnological values , the works shall be stopped and notified to the legal authorities/ institutions.

All objects of cultural or archaeological importance are identified and distanced from the project footprint and are not affected at all by the reconstruction of the road.

Following are listed Cultural Heritage near the project footprint:

- Kamnik Castle (25)
- Bejkova Castle (26)
- Gradec Castle (27)
- Radanji Castle (28)
- The church of St. Mary (57)

Prior implementation of this project , the Contractor shall follow Chance Find Procedure as per Albanian Law No 27/2018 on Cultural Heritage and also as per EBRD's standarts (PR 8).

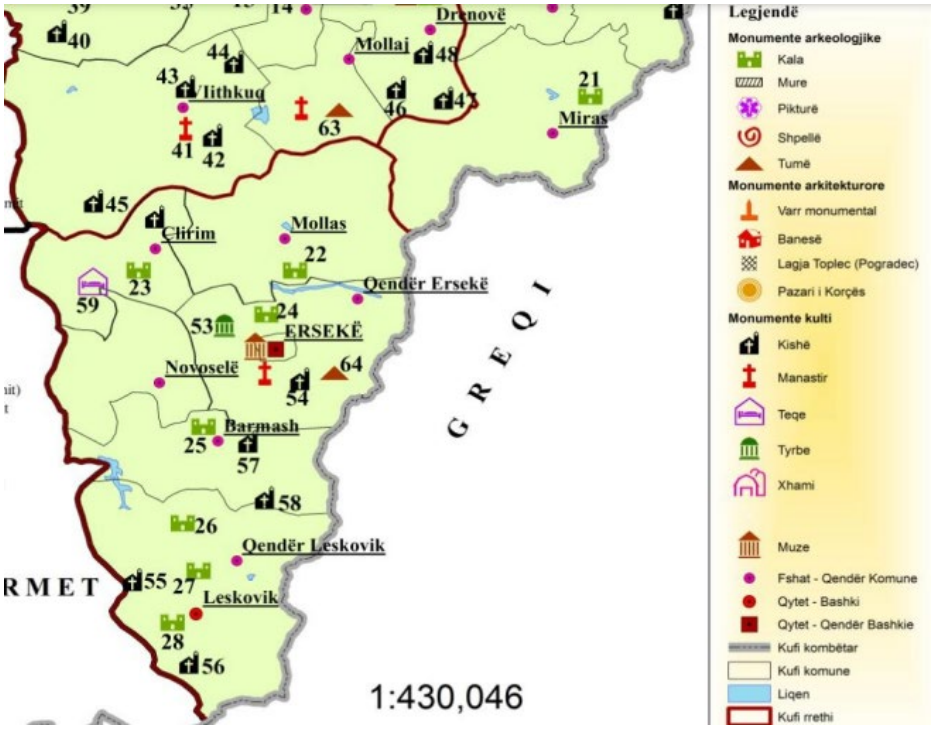


*Figure 8: Cultural Heritage related to the project area*

# 4. SUMMARY OF ENVIRONMENTAL AND SOCIAL IMPACTS AND MITIGATION MEASURES

## 4.1. Identification of Environmental Issue

The identification of environmental issues, is based on the procedures included in the EMF document, namely the screening checklist followed by a general environmental evaluation matrix .

The second part of the checklist is built in as a very simple matrix, based on 3 evaluation levels that represent the magnitude of negative impacts:

1 = Low level of impact

2 = Medium level of Impact

3 = High level of impact.

*Table 3: Screening criteria template related to Construction Activities performed– Checklist matrix (to be used by ADF)*

| CRITERIA | YES | NO | Comments |
|---|---|---|---|
| Does the existing road have a valid operating permit, licenses, approvals etc.? If not, please explain.<br>Permits to screen for include:<br>- Construction Permit<br>- Operational /Use Permit<br>- Urbanistic Permit<br>- Environmental Permit<br>- Water Management Permit<br>*If not, will the investment be used to correct this condition?* | YES | | |
| Does the existing road have or is awaiting (or is required by law to have) an environmental permit? | YES | | Updating the existing permit(Preliminary environmental impact assessment ). |
| Is operation of the existing road mandated through special provisions of Albanian Environmental Regulations regarding protected areas or cultural heritage?<br>If not, please explain. | | No | Not any specific site (natural or heritage protected area) is affected by upgrading of the road as per this project. |
| Are there any significant outstanding environmental fees, fines or penalties or any other environmental liabilities (e.g. pending legal proceedings involving environmental issues etc.)<br>If so, please explain.<br>*If so, will the investment be used to correct this condition?* | | No | |
| Will the sub-project require procurement of substantial amounts of materials to be used – stone, aggregate, sand, asphalt or others that needs environmental permit? | Yes | | Any kind of raw material to be used should be joined by the Environmental permit for its exploitation (ex. Permit for exploitation of open quarries, permits for exploitation of ground water etc.) |

| CRITERIA | YES | NO | Comments |
|---|---|---|---|
| Will the subproject generate large quantities of construction waste that will need permission from the Commune to be disposed off? | Yes | | The implementer (construction company) should agree with local government on waste management ways and time/table, waste disposal, etc. |
| Will the project be located within or close to officially protected areas or areas under consideration by the Government for official protection status? | YES | | A part of the existing road to be upgraded pass along the protected area ( more details refer to the ESIA and Biodiversity Management Plan). Prevention measures to be applied as per ESIA and BMP. |
| Will the project potentially impact areas of known significance to local, regional or national cultural heritage?<br>During the public consultation, the local population should be asked to provide information about any sites or structures which are not on any official list, but which they consider to be of significance and which they think should be protected) | | No | |
| Does the project negatively affect community assets or activities? | | No | |

| Proposed Sub -project | Level of existing or expected impact (1=low, 2=medium, 3=high) | Comment |
|---|---|---|
| Will the project cause changes in the drainage patterns of the road and the immediate surrounding areas? | 1 | Unimportant changes caused by opening and cleaning of the road's drainage channels |
| Will the project cause air, land and/or water pollution by dusts, noises and/or vibrations. | 1 | During construction and operation phases |

| Proposed Sub -project | Level of existing or expected impact (1=low, 2=medium, 3=high) | Comment |
|---|---|---|
| Will the subproject include activities that will require sanding, paints, or other potentially hazardous materials that will need to be properly stored and contained? | 1 | Only filling material for the cracks and potholes, and painting for road marking (signage), which do not represent any environmental threat |
| Doest the project create conditions for accidental pollution by leakages? | 1 | Accidental pollution by damaged cars or equipment's, paint storage, etc. can happen, and should be managed to protect waters sources |
| Will the project affect any species or population with specific status? | 1 | No species with specific status observed in the road segment and close surroundings (excluding the amphibians living in the draining channels) will be impacted as per the works to be executed by the project |
| Does the project create problems on accessibility | 2 | During construction works traffic is expected |
| Has the local population or any NGOs expressed concern about the sub-project environmental aspects or expressed opposition?<br>Are expected public claims? | 1 | Very limited concerns are expected for these type of activities, by local population |
| Is there any other aspect of the sub-project that would – through normal operations or under special conditions – cause a risk or have an impact on the environment, the population or could be considered as a nuisance? | 1 | No impacts that cannot be managed, or considered as a nuisance source, are found in the site area |
| **Total of existing or expected impact value** | 9 | |

Note: Level of expected impact: 1 expresses the lowest negative impact, 2 the medium level, and 3 the highest one. In case that no impact is expected, please leave the cell empty.

## 4.2. Environmental Mitigation measures

The Environmental Management Plan considers the findings and characterization of impacts, and the preparation of the Environmental Mitigation Measures and Monitoring Program, as integral part of the detailed design document and implementation program.
The Environmental Mitigation Plan for maintenance and upgrading activities as per the road section Erseka – Leskovik is an integral part of the EMP. The mitigation measures are separated into two parts, one for the management plan for maintenance and upgrading phase, and the second for the impacts that are encountered during the operational phase.

Notification, Worker and Citizens Safety, are considered as very important issues to be considered in realizing the public awareness, community support, and traffic facilitation. Mitigation measures for construction and rehabilitation activities are considered as very important. Water and land quality, waste management and traffic/road safety are considered for some general orientation on mitigation measures. All mitigation measures are in respect with Albanian construction and environmental legislation, and specifically with the Law No. 10431, dated 09.06.2011, "On Environmental Protection".

| Issues upon phases and mitigation measures | | | Associated Costs | | Institutional | | Comments |
|---|---|---|---|---|---|---|---|
| *Phase* | *Issue* | *Mitigating Measure* | *For installation* | For operation | Install | Operate | |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Upgrading of the road | The overall worker safety, and risks of unauthorized access to construction site of inhabitants | ▯ The inhabitants leaving close to road under upgrading activities will be notified of the works activity , objectives and temporary expected negative impacts through appropriate communication; public meetings, etc.<br>▯ All legally required permits will be acquired for construction activities. Contractor formally agrees that all work will be carried out in a safe and disciplined manner designed to minimize impacts on neighboring residents and environment. Including organization of transport to minimize impacts on neighborhood, and washing of vehicle tires to minimize spreading of debris on the roads.<br>▯ Workers will comply with international good practice (always hardhats, as needed masks and safety glasses, harnesses etc).<br>▯ Workers also will be contracted respecting Albanian legislation, and the developer should respect all hygienic and safety rules conditioned by Albanian legislation. Life insurance of workers etc will be provided by the employer. Technical security measures will be provided by the employer.<br>▯ Emergency safety kit should be placed close to the working place for intervention in case of accidents. Emergency contacts and numbers should be clearly posted on site.<br>▯ Appropriate warning signposting of the | Provision of safety equipment, safety kits and signs is included in Contractor operating costs | | Contractor | Supervised by Supervision company or engineer | |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Upgrading of the road | Use of raw materials may pose an additional stress on the natural environment | Use raw materials (sand, gravel, stone) only from suppliers that have valid licenses issued by the National Environmental Agency and/or Regional Environmental Agency /NEA. | No additinal costs incurred | | Contractor | Supervised by Supervision company or engineer | Exploitation of Natural resources |

| **Issues upon phases and mitigation measures** | | | **Associated Costs** | | **Institutional Responsibility** | | **Comment (e.g. secondary impacts)** |
|---|---|---|---|---|---|---|---|
| **Phase** | **Issue** | **Mitigating Measure** | **For installation** | **For operation** | **Install** | **Operate** | |
| Upgrading of the road | Noise generated during works may pose a threat or disturbance to the workers on site, animals and neighboring | Construction noise will be limited to restricted times agreed to in the permit in respect with Albanian Environmental Legislation<br>During operations the engine covers of generators, air compressors and other powered mechanical equipment shall be closed, and equipment placed inside the construction site. | Covers for electric generators 200 EURO/unit | | Contractor | Supervised by Supervision company or engineer | |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Upgrading of the road | Works done for cleaning of draining channels might lead to partial removal of vegetation | In case of unavoidable damage, re-plant same species on road peripheries.<br>Ensure visually the same appearance as before works started. | Depends on plant species. Proper planning can ensure plants are replaced rather than new ones bought<br>Refer to Biodiversity management plan | | Contractor | Supervised by Supervision company or engineer | Temporary decrease of green cover efficiency |
| Upgrading of the road | Traffic disturbances and slow down | Ensure local community is aware of any major transport requirements and disruptions to the regular traffic pattern.<br>Adequately manage traffic and use postings to warn others of possible congestion. | No additional costs incurred | | Contractor | Supervised by Supervision company or engineer | |

| **Issues upon phases and mitigation measures** | | | **Associated Costs** | | **Institutional Responsibility** | | **Comment** |
|---|---|---|---|---|---|---|---|
| **Phase** | **Issue** | **Mitigating Measure** | **For installation** | **For operation** | **Install** | **Operate** | |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Upgrading of the road | Dust emissions from the site may impact air quality and pose a health threat to workers and neighbors | □ In case of disposal of dredged or excavated materials the debris shall be kept in controlled area and sprayed with water mist to reduce debris dust<br>□ During pneumatic drilling/compaction dust shall be suppressed by ongoing water spraying and/or installing dust screen enclosures at site<br>□ The surrounding environment (at last one road line) shall be kept free of debris to minimize dust<br>□ There will be no open burning of construction / waste material at the site<br>□ There will be no excessive idling of construction vehicles at sites<br>□ All materials will be supplied/transported in a manner which minimizes dust – including covered truck loads or closed off truck loads, with dust suppressing measures through water spraying | Cost of 1 m3 of clean water on site: 40 Euro<br>DCM on Tax of Drinking water, No. 203, dated on 08.05.1997 | | Contractor | Supervised by Supervision company or engineer | *All such measures will be in respect with DCM No.* 803, dated 4.12.2003 On air quality standards *And the law 9774, date 12.07.2007, on evaluation and management of noises on environment* |

| Issues upon phases and mitigation measures | | | Associated Costs | | Institutional Responsibility | | Comments (e.g. secondary impacts) |
|---|---|---|---|---|---|---|---|
| **Phase** | **Issue** | **Mitigating Measure** | **For installation** | **For operation** | **Install** | **Operate** | |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Upgrading of the road | Improper waste management may cause pollution of soil, surface and groundwater, and pose a health risk | Designated waste disposal areas will be allocated on site, including waste collection bins for smaller waste, and designated areas for bulkier waste<br>All waste, including construction debris and excavated materials will be regularly and timely transported off site and managed through an authorized agency or disposed of at a site that was officially designated by the local authorities – Municipality ( Local administrative units)<br>Waste collection and disposal pathways and sites will be identified for all major waste types expected from demolition and construction activities.<br>Mineral construction and demolition wastes will be separated from general refuse, organic, liquid and chemical wastes by on-site sorting and stored in appropriate containers.<br>The records of waste disposal will be maintained as proof for proper management as designed.<br>Whenever feasible the Contractor will reuse and recycle appropriate and viable materials<br>Removed vegetation on roundabouts may best be composted on site, at a designated and managed area.<br>All oily wastes will be separately collected, in bins which are leak-proof, and will be handled over to the authorized management and disposal<br>company, receipts for which shall be kept.<br>Ensure agreements with community and services (cafeterias etc) to use their toilets for worker needs | Cost of waste management – per 1 truck to the designated site in compilation with other site disposals 70 Euro/Year<br>Local Tax<br>One container (bin) for solid municipal waste 130 Euro<br>One container for hospital wastes 20 Euro | | Contractor | Supervised by Supervision company or engineer<br>ADF staff | All measures will be in respect with existing legislation regarding waste management |

| Issues upon phases and mitigation measures | | | Associated Costs | | Institutional Responsibility | | Comments (e.g. secondary impacts) |
|---|---|---|---|---|---|---|---|
| **Phase** | **Issue** | **Mitigating Measure** | **For installation** | **For operation** | **Install** | **Operate** | |
| Upgrading of the road | Construction works on site may impact the quality of surface waters bodies, subsequently ground water | ▯ The site will establish appropriate water and sediment control measures such as e.g. silt fences to prevent water sediment from moving off site and causing excessive turbidity in the channel.<br>▯ Collectors will be temporary adapted to avoid surface water dispersion in case of watering of sand or gravel to control the dusts<br>▯ The approach to handling sanitary wastes and wastewater from working sites (installation or reconstruction) must be approved by the local authorities<br>▯ Construction vehicles and machinery will be washed only in designated areas where runoff will not pollute natural surface water | Costs for collecting sanitary waters on site 1000 EURO Cost of plastic covers 50 EUR) Cost of barriers in collectors 50 EURO | | Contractor | Supervised by Supervision company or engineer | DCM no. 177, date 31.03.2005 for environmental l norms on liquid discharges and zoning of receiving environments |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Upgrading of the road | Improper material storage and use may cause pollution of air, soil or water | □ Store all materials in original containers in adequate locations, which allow for leak-proof storage<br>□ Do not dispose of paint and other waste containers except through adequate handling procedures<br>□ Ensure workers are familiar with safety regulations and storage | No additional costs incurred | | Contractor | Supervised by Supervision company or engineer | |

| **Issues upon phases and mitigation measures** | | | **Associated Costs** | | **Institutional Responsibility** | | **Comments (e.g.** |
|---|---|---|---|---|---|---|---|
| **Phase** | **Issue** | **Mitigating Measure** | **For installation** | **For operation** | **Install** | **Operate** | |
| Upgrading of the road | Flooding of lands in surroundings of the road by maximum rainfalls in atmospheric events | □ Maintenance or restoration of draining system and related objects | Dredging and cleaning to be decided by the consultant/c ontractor (Approx cost 2 000 EURO) | | Contractor | Supervised by Supervision company or engineer | |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Upgrading of the road | Accidents during construction works may cause unintentional damage to the local infrastructure or power supply net | □ Ensure all adequate permits from local utilities have been obtained<br>□ Ensure familiarity with networks in the proximity of the site<br>□ In case of accidental disruption, immediately stop all works, notify proper local administrative unites authorities and emergency remediation of damaged network in line with the requirements of Law on civil emergencies No.8756, | No additional costs incurred, potential delay in works | | Contractor | Supervised by Supervision company or engineer | Temporary delay the Project implementation |
| Upgrading of the road | Chance findings of any cultural and historical artifacts | □ All works will be stopped, and responsible authorities contacted. Works will start again only once adequate clearances have been obtained. | Not defined | | Contractor | Supervised by Supervision company or engineer | |
| Upgrading of the road | Not appropriate health and hygienic condition for working staff | □ Ensure agreements with community and services (cafeterias etc) to use their toilets for worker needs | Not defined | | Contractor | Supervised by Supervision company or engineer | |
| **Issues upon phases and mitigation measures** | | | **Associated Costs** | | **Institutional Responsibility** | | **Comments (e.g. secondary impacts)** |

| Phase | Issue | Mitigating Measure | For installation | For operation | Install | Operate | |
|---|---|---|---|---|---|---|---|
| Upgrading of the road | Works in the road may pose a health risk to the workers due to uncontrolled releases of sewage and accidental leaks | □ Ensure workers are equipped with protective equipment<br>□ Avoid direct contact with contaminated sites if they will be defined during the works | No additional costs incurred, Contractor should have proper protection equipment | | Contractor | Supervised by Supervision company or engineer | |
| **The following mitigation measures are related to the operational phase of the road and serve as a guideline for the ADF to improve their performance with the project implementation** | | | | | | | |
| Operation | Outdated of signals and lighting | □ Refresh the signal system periodically | To be defined by ADF | | | ADF | |
| Operation | Road damage or consuming of pavement | □ Rehabilitate the road periodically | To be defined by ADF | | | ADF | |
| Operation | Road damage and traffic delay by debris of soils and soil slides | □ Clean culverts if necessary, replace with appropriate size ones | To be defined | | Consultant | ADF | |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Operation | Habitat fragmentation and problems on accessibility of pupils with school, of the community with health service etc. | Place in the right sites passages with appropriate size to ensure access of persons and also for transport of animals. | To be defined | | Contractor and local government | ADF and local government | |
| Operation | High level of air pollution | Green barriers in road sites (using two belts, the first with evergreen, dens crown autochthon shrubs and the second with evergreen, dens | To be defined | | | ADF | |

| **Issues upon phases and mitigation measures** | | | **Associated Costs** | | **Institutional Responsibility** | | **Comments(e. g. secondary impacts)** |
|---|---|---|---|---|---|---|---|
| **Phase** | **Issue** | **Mitigating Measure** | **For installation** | **For operation** | **Install** | **Operate** | |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Operation | Improper solid waste collection and management may pose a threat to soil and water quality | Set up proper waste management procedures, including separation of waste into oily and hazardous waste, regular municipal and green waste which can be composted in collaboration with local administrative unites / government authorities<br>Ensure sufficient waste collection bins are available on site and that regular collection of wastes is ensured | Costs of authorized waste collection per year 70 EURO | | | Local waste collection utility | |
| Operation | Leaks and spills in road can pollute the surface water | Have in place leak control action plan<br>Provide leak proof collectors of oily wastes or equipment which can drip oil<br>Ensure waste is adequately managed | No additional costs | | | ADF | |

# 5. ENVIRONMENTAL AND SOCIAL MONITORING

The environmental monitoring program will be focused on following elements:

Respecting of the Management Plan orientation

Respecting of technical specifications

Respecting of Albanian legislation for worker safety (health, insurance, etc)

Safeguard of workers and inhabitants,

Materials discharge provisions.

Grievance Mechanism

The monitoring process will be focused on the working space and surrounding territories, as well as in the roads that will be used for transport of materials from the sources to the working space, or from the working space to the disposal sites. Technical actions, environmental and safety specifications, as well as other procedures defined running the implementation can be checked or justified by the following table.

The monitoring table considers the parameter to be monitored, where will be monitored, how, when, and why will be monitored, the cost and monitoring responsibility.

The costs are given with approximate amounts considering present free market prices. It is the interested party that selects the monitoring consultant, and involves it on the monitoring process only after approval by NEA/ADF and supervision.

## 5.1. Environmental and Social Monitoring

*Table 4:Environmental Monitoring Program*

| Phase | What (Is the parameter to be monitored?) | Where (Is the parameter to be monitored?) | How (Is the parameter to be monitored?) | When (Define the frequency/ or continuous?) | Why (Is the parameter being monitored?) | Cost (if not included in project budget) | Who (Is responsible for monitoring?) |
|---|---|---|---|---|---|---|---|
| Before upgrading activities /works | The places to be used for disposal of working materials, garbage bins, waste bins, office and emergeny box etc | In sides of the road project | Verification on maps or plans of detailed design | Only once-before implementation | To ensure that waste management and life safety instruments are already planned to be placed | Not additional cost | Detailed design consultant |

| **Phase** | **What** (Is the parameter to be monitored?) | **Where** (Is the parameter to be monitored?) | **How** (Is the parameter to be monitored?) | **When** (Define the frequency/ or continuous?) | **Why** (Is the parameter being monitored?) | **Cost** (if not included in project budget) | **Who** (Is responsible for monitoring?) |
|---|---|---|---|---|---|---|---|
| Before upgrading activities /works | Awareness and information of the community and decision makers | In the respective local administrative unites expected affected villages | Meetings with interested parties | Once-before the implementation | To ensure that the community is well informed and decision makers involved | Not additional cost | ADF |

| Phase | What (Is the parameter to be monitored?) | Where (Is the parameter to be monitored?) | How (Is the parameter to be monitored?) | When (Define the frequency/ or continuous?) | Why (Is the parameter being monitored?) | Cost (if not included in project budget) | Who (Is responsible for monitoring?) |
|---|---|---|---|---|---|---|---|
| During upgrading activities /works | Notification, Worker and community safety and health | On working sites | Maintain a log of neighbor notification, all permits obtained, supervisor will provide regular reports on EMP compliance, worker safety, and on possible complaints Appropriate signs will be inspected visually | Continuously during upgrading works | To ensure works are conducted as per the utmost safety and environmental protection standards | Should be included in costs for supervisor, no additional measurement costs envisaged | Contractor to implement, Supervisor to review and report on |

| Phase | What (Is the parameter to be monitored?) | Where (Is the parameter to be monitored?) | How (Is the parameter to be monitored?) | When (Define the frequency/ or continuous?) | Why (Is the parameter being monitored?) | Cost (if not included in project budget) | Who (Is responsible for monitoring?) |
|---|---|---|---|---|---|---|---|
| During upgrading activities /works | Air and Soil quality | On working sites and surrounding areas | Visually inspect dust generation and control.<br>Inspect presence and if any smell is emitted from the septic tank on site.<br>Visually inspect presence of clandestine waste on site and in surroundings.<br>Visually inspect for leaks of oily materials and signs of open burning of wastes.<br>Keeps proof of waste being collected by authorized entity. | Continuously during construction works | To ensure works are conducted as per the utmost safety and environmental protection standards | Should be included in costs for supervisor, no additional measurement costs envisaged | Contractor to implement, Supervisor to review and report on |

| **Phase** | **What** (Is the parameter to be monitored?) | **Where** (Is the parameter to be monitored?) | **How** (Is the parameter to be monitored?) | **When** (Define the frequency/ or continuous?) | **Why** (Is the parameter being monitored?) | **Cost** (if not included in project budget) | **Who** (Is responsible for monitoring?) |
|---|---|---|---|---|---|---|---|
| During upgrading activities /works | Noise levels | On working site and surrounding areas | Ensure compliance with permit as per Albanian law. Measurements on complaints from neighbors. | Continuously during construction works | To ensure noise levels do not exceed permissible | Should be included in costs for supervisor, no additional measurement costs envisaged – in case of complaints, set of noise measurement is approximately 500 Euro per sampling point. | Contractor to implement, Supervisor to review and report on |

| Phase | What (Is the parameter to be monitored?) | Where (Is the parameter to be monitored?) | How (Is the parameter to be monitored?) | When (Define the frequency/ or continuous?) | Why (Is the parameter being monitored?) | Cost (if not included in project budget) | Who (Is responsible for monitoring?) |
|---|---|---|---|---|---|---|---|
| During upgrading activities /works | Water Quality | On construction site and surrounding areas | Visually and upon complaints of increased turbidity, waste materials in canals, spills or leaks. | Continuously during construction works | To ensure there is no pollution caused to the waters | Should be included in costs for supervisor, no additional measurement costs envisaged. In case of public compliance measurements should be done with a cost of 500 Euro per sampling point | Contractor to implement, Supervisor to review and report on |

| Phase | What (Is the parameter to be monitored?) | Where (Is the parameter to be monitored?) | How (Is the parameter to be monitored?) | When (Define the frequency/ or continuous?) | Why (Is the parameter being monitored?) | Cost (if not included in project budget) | Who (Is responsible for monitoring?) |
|---|---|---|---|---|---|---|---|
| During upgrading activities /works | Waste management | On working site and surrounding areas | Visually for separation of wastes, review receipts from the collection company, or notification from the commune on the proper site of the disposal | Continuously during construction works | To ensure there is no risk of environmental pollution caused by construction works | Should be included in costs for supervisor, no additional measurement costs envisaged | Contractor to implement, Supervisor to review and report on |
| During upgrading activities /works | Damage to vegetation in road sides | On working site and surrounding areas | Site log and visual inspection | Continuously during construction works | To ensure no damage to vegetation | Should be included in costs for supervisor, no additional measurement costs envisaged | Contractor to implement, Supervisor to review and report on |

| **Phase** | **What** (Is the parameter to be monitored?) | **Where** (Is the parameter to be monitored?) | **How** (Is the parameter to be monitored?) | **When** (Define the frequency/ or continuous?) | **Why** (Is the parameter being monitored?) | **Cost** (if not included in project budget) | **Who** (Is responsible for monitoring?) |
|---|---|---|---|---|---|---|---|
| During upgrading activities /works | Storage of paint, oil or other hazardous materials | On working site and surrounding areas | Visually ensure proper storage, and no leaks or spills | Continuously during construction works | To minimize risks of pollution of hazardous materials | Should be included in costs for supervisor, no additional measurement costs envisaged | Contractor to implement, Supervisor to review and report on |
| During upgrading activities /works | Chance findings | On working site and surrounding areas | Through site log | Regularly through construction works | To ensure adequate management of chance findings | Should be included in costs for supervisor, no additional measurement costs envisaged | Contractor to implement, Supervisor to review and report on |

| Phase | What (Is the parameter to be monitored?) | Where (Is the parameter to be monitored?) | How (Is the parameter to be monitored?) | When (Define the frequency/ or continuous?) | Why (Is the parameter being monitored?) | Cost (if not included in project budget) | Who (Is responsible for monitoring?) |
|---|---|---|---|---|---|---|---|
| During operation | Road and artefacts conditions | On road | Visually | Continuously | To ensure proper working of the road | Not additional cost | ADF, local administrative unites |
| During operation | Road signals and lighting | On Road side | Visually | Continuously | To ensure proper safety measures | Not additional cost | ADF REA , local administrative unites |
| During operation | Pollution by discharges or leaks | On Road side | Visually, if needed monitoring | continuously | To ensure proper environmental quality | Not additional cost | REA , local administrative unites Commune |

# 6. CONTRACTOR'S SITE SPECIFIC ENVIRONMENTAL AND SOCIAL MANAGEMENT PLANS

## 6.1. List of Management Plans to be developed

The following management plans shall be prepared by Contractor and approved by the Client (supervisor).

| Management Plans | Responsibility (preparation, approval / and implementation) | Timeline (preparation) | Description |
|---|---|---|---|
| Waste and Wastewater Management Plan | Contractor / Engineer / Contractor ADF monitoring | As per FIDIC 4.1 Contractor's Obligations: Contractor will submit to the Engineer, the contractor's Documents in accordance with the procedures specified in the Contract. | The plan should be prepared by contractor and will assure the environmental control steps necessary to reduce the environmental impacts during the entire cycle of the project with regard to waste and waste water generated by contractors works on site. |
| Hazardous materials and Hazardous Waste Management Plan | Contractor / Engineer / Contractor ADF monitoring | As per FIDIC 4.1 Contractor's Obligations: Contractor will submit to the Engineer, the contractor's Documents in accordance with the procedures | With regard to Hazardous materials and Hazardous Waste (if will be the case) contractor will also develop a plan, to avoid, minimise the waste on site during contractor's works. |

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|---|---|---|---|
| | | specified in the Contract. | |
| Watercourse Management Plan | Contractor / Engineer / Contractor ADF monitoring | As per FIDIC 4.1 Contractor's Obligations: Contractor will submit to the Engineer, the contractor's Documents in accordance with the procedures specified in the Contract. | For projects planned to undertake works within a watercourse, it is needed a permission to do so by law. In such case, a management plan is indicated as per law requirements. |
| Borrow pits and Deposit Sites Management Plan | Contractor / Engineer / Contractor ADF monitoring | As per FIDIC 4.1 Contractor's Obligations: Contractor will submit to the Engineer, the contractor's Documents in accordance with the procedures specified in the Contract. | Contractor has to prepare a plan for the borrow pits, whether selected material on site or materials provided from approved factory of inert materials. Contractor will prepare a plan for temporary Deposit sites, and also for final despite site, which have to be approved from the Municipality. |
| Health and Safety Plan | Contractor / Engineer / Contractor ADF monitoring | As per FIDIC 4.1 Contractor's Obligations: Contractor will submit to the Engineer, the | H&S plan will be prepared in relation to Albanian Law and EBRD PR4. |

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| | | contractor's Documents in accordance with the procedures specified in the Contract. | |
| Traffic Management Plan (to ensure safety of local communities from construction traffic) | Contractor / Engineer / Contractor ADF monitoring | As per FIDIC 4.1 Contractor's Obligations: Contractor will submit to the Engineer, the contractor's Documents in accordance with the procedures specified in the Contract. | Traffic management plan will be prepared in relation to Albanian Law and EBRD PR4. The plan will be approved also by the Municipality. |
| Water Resource Protection Plan (to prevent contamination of drinking water) | Contractor / Engineer / Contractor ADF monitoring | As per FIDIC 4.1 Contractor's Obligations: Contractor will submit to the Engineer, the contractor's Documents in accordance with the procedures specified in the Contract. | For projects planned to undertake works within a watercourse nearby water source, it is needed a permission to do so by law. In such case, a management plan is indicated as per law requirements. |

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| Boundary Marking and Protection Strategy (for mobilization and construction to prevent offsite adverse impacts) | Contractor / Engineer / Contractor ADF monitoring | As per FIDIC 4.1 Contractor's Obligations: Contractor will submit to the Engineer, the contractor's Documents in accordance with the procedures specified in the Contract. | Contractor will indicate and mark the project area, and will in order to prevent offsite adverse impacts. This will be done in coordination with RSK studies and recommendations. |
| Biodiversity Action Plan | BMP prepared by RSK Contractor/ Supervisor/Contractor | As per FIDIC 4.1 Contractor's Obligations: Contractor will submit to the Engineer, the contractor's Documents in accordance with the procedures specified in the Contract. | The biodiversity Management Plan is prepared by RSK, and Contractor will prepare the action plan to address the recommendations. |
| Worksite Management Plan | Contractor / Engineer / Contractor ADF monitoring | As per FIDIC 4.1 Contractor's Obligations: Contractor will submit to the Engineer, the contractor's Documents | The worksite management plan, may be standard templates, referring the works taking place on site, sketch of the design, methodology, materials, no. of workers, working hours, schedule of works, monitoring of dust, vibrations, noises etc |

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| | | in accordance with the procedures specified in the Contract. | |
| Site Emergency Plan | Contractor / Engineer / Contractor ADF monitoring | As per FIDIC 4.1 Contractor's Obligations: Contractor will submit to the Engineer, the contractor's Documents in accordance with the procedures specified in the Contract. | Should contain the Evacuation route maps posted in each work area. The following information is marked on evacuation maps:<br>1. Emergency exits<br>2. Primary and secondary evacuation routes<br>3. Locations of fire extinguishers<br>4. Fire alarm pull stations' location<br>a. Assembly points<br>• Site personnel should know at least two evacuation routes.<br>-emergency reporting and evacuation procedures, medical emergency, training etc. |
| Accommodation Plan | Contractor / Engineer / Contractor ADF monitoring | As per FIDIC 4.1 Contractor's Obligations: Contractor will submit to the Engineer, the contractor's Documents in accordance with the procedures specified in the Contract. | The accommodation provided for non-resident Personnel in a camp or an alternative structure outside of the Project Areas, such as a hotel or rented house, will comply with the conditions of the present ESHS. Among others necessary Covid-19 disinfection measures shall be planed. |
| Specific mitigation plan for endangered species in the wider area | Contractor / Engineer / Contractor | As per FIDIC 4.1 Contractor's Obligations: | The BMP prepared by RSK, will be followed and applied from Contractor. |

| | | | |
|---|---|---|---|
| | ADF monitoring | Contractor will submit to the Engineer, the contractor's Documents in accordance with the procedures specified in the Contract. | |
| Develop and implement a Reinstatement and Landscaping Plan | Contractor / Engineer / Contractor ADF monitoring | As per FIDIC 4.1 Contractor's Obligations: Contractor will submit to the Engineer, the contractor's Documents in accordance with the procedures specified in the Contract. | Reinstatement and Landscaping Plan includes regular watering and monitoring to minimize impacts to priority habitats and species. It can also be merged with "Specific mitigation plan for endangered species in the wider area" |
| Community Interaction plan | Contractor / Engineer / Contractor ADF monitoring | As per FIDIC 4.1 Contractor's Obligations: Contractor will submit to the Engineer, the contractor's Documents in accordance with the procedures | SEP stake holder Engagement plan is prepared, and Contractor has to comply and follow the plan accordingly. |

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|---|---|---|---|
| | | specified in the Contract. | |
| Gender Diversity Action Plan | Contractor / Engineer / Contractor ADF monitoring | As per FIDIC 4.1 Contractor’s Obligations: Contractor will submit to the Engineer, the contractor’s Documents in accordance with the procedures specified in the Contract. | EBRD has launched a new guidance on GBVH that may of help: https://www.ebrd.com/news/2020/new-guidance-for-private-sector-on-addressing-risks-of-genderbased-violence-and-harassment.html |

# 7. IMPLEMENTATION

## 7.1 Training, Awareness and Competence

### 7.1.1 Induction Training

It shall be in the Contractor philosophy that the experience skills and training of its personnel is of great importance for the confirmation of its success and a competitive advantage in the construction market. All CONTRACTOR's personnel will be responsible for ESCHH&S aspects and competent enough to fulfill its duties.
Competence is a mix of education, experience and training that Contractor shall offer to every employee involved directly or indirectly with ESCH H&S aspects.
Appropriate training will be given to the personnel of the Contractor and its SubContractors. Also an assessment will be made of the competences of Contractor's personnel.
Contractor shall provide specific introduction training and toolbox meetings regarding ESCH H&S aspects. Additional training shall be provided when required. Contractor shall make allowance for its personnel to attend training courses.
It is mandatory for all personnel to attend the H&S orientation program on their first day of work. No personnel shall be permitted to work on the site or allowed access to the site without first attending the orientation course. As part of the induction training, all employed personnel at the work site shall be advised that failure to work safely and follow safe practices shall result in disciplinary actions up to and including termination.
Contractor shall also reinforce community relations training with additional tool box training.

### 7.1.2 Training Program and Frequency

This procedure shall be rolled-out to Site level ESCH personnel as part of the implementation process for the revised the overall Contractor ESMS. The requirements of the procedure shall be explained in detail and discussed. Any skills and knowledge gaps of personnel with respect to their roles and responsibilities under this procedure shall be identified and the means identified to address deficiencies. This may include on the job coaching, mentoring and in-service or off-site training.

The initial roll-out and implementation of this procedure shall provide an opportunity to identify opportunities for improvement and to revise the procedure accordingly. The roll-out process shall also be a de-facto gap analysis providing useful information regarding the work required to move from the current situation to full implementation of the procedure. The procedure shall be subject to formal audit in line with the Contractor ESMS Audit Program .The procedure's effectiveness shall be reviewed as part of a formal management review of the Contractor ESMS.

### 7.1.3 Types of trainings (e.g. 'Toolbox Talk' training)

A flexible, modular-based, programme to heighten participants' awareness of ways in which their operations can affect the environment, the principles of environmental management and the practical steps they need to take as individuals and as an organisation to improve environmental performance.

**Training objectives**
Depending on the course modules selected, this programme will give participants:

- Increased awareness of relevant environmental issues

- A greater understanding of, and commitment to, the organisation's environmental management programme
- Preparation for any responsibilities they may have under an Environmental Management System

ES manger is reposnisble to draft and aprove the Training Yearly Program which wil be developed for all the staff involved in the project .

Environmental and social staff of the company shall be also trained by specialised accreditated bodies related to ISO 14001.

External expert /consultant may be involved for training of the staff for specific issue.

Toolbox talks are an easy way for foremen and supervisors to supplement Environmental and social training efforts of their company or organization .

Continual training is essential for the reduction of incidents that could impact on the environment within and around construction sites. This suite of toolbox talks (TBTs) forms part of continuing efforts to create an increased awareness of environmental and sustainability issues.

The toolbox talks below are some of the most important relevant to the construction activities.

- Working on previously developed land
- Working around trees and hedgerows
- Dust and air quality
- Cement and concrete
- Built Heritage
- Bentonite
- Be a good neighbour
- Archaeology
- Storage of waste
- Waste hierarchy
- Cleaning plant and machinery
- Spill control
- Energy efficiency
- Silt
- Segregation of waste
- Control of road sweeper arisings
- Material storage, handling and housekeeping
- Hazardous or special waste
- Fuel and oil
- Working on or near watercourses
- Noise and vibration
- Pumping and overpumping
- Demolition

Here are a few tips to keep in mind when conducting a toolbox talk for your workers:

1. Read the toolbox talk to yourself a couple of times before you hold the actual meeting with workers. That way you will be more familiar with the content to be covered and therefore less apt to stumble while reading to the group.
2. Try to hold the toolbox talk in an area that is free of noise and other distractions. If the workers cannot hear you talking, or are distracted by other activities in the area, they won't be focusing on your talk.
3. Speak clearly and directly. Mumbling or reading too fast makes it difficult for the workers to understand you. Just take a deep breath, and then speak clearly and at a natural pace.
4. Use a prop when possible to help you keep the workers attention. If you are giving a toolbox talk on setting up a portable step ladder, have one set up nearby so you can point out things as you read the

toolbox talk. Always give workers an opportunity to ask questions at the end of the toolbox talk. Don't make snide remarks to employees who do ask a question, as this will discouraging others from asking questions later.

5. Always document your toolbox talks. Have the information about the topic, the trainer, the date, and names of the workers on file.
6. Last but not least, practice what you preach. Nothing makes a trainer lose credibility faster than to have a worker see them doing something that violates the safety precautions that were covered in a previous toolbox talk. Always set a good example for others.

## 7.2 Stakeholder engagement, Consultation and Communication

### 7.2.1 Public consultations during ESMP phase

Stakeholder Engagement aims to:

- To provide timely construction information, program and notification in order to inform and minimize impact on stakeholders
- To demonstrate a visible and proactive attitude in stakeholder engagement
- To support the provision of local content and training activities
- To continue to develop positive long term relationships with all stakeholders
- To build and protect Contractor brand, reputation and safeguard our social li-cense to operate
- To align with the following national and international requirements:
  - Albanian national requirements for consultation, including Article 102 of the Albanian Constitution, paragraph 2 of Article 6 on the Law no 8990 (23.01.2003);
  - EBRD Performance Requirements PR5 and PR10

Contractor shall be responsible for:

- Obtaining all necessary permits required for the performance of the Contract, except if otherwise provided by the Client.
- Adhering to and fulfilling all of the conditions and reporting requirements associated with any permit.
- Abiding by all national laws, rules and regulations concerning environmental protection, human rights and social safeguards.
- Implementation of all commitments , any environmental, socio-economic or other codes of conduct required by the Client.
- Contractor will also:
- be required to undertake regular environmental, social and cultural heritage monitoring and inspections and reporting directly to the Client.
- need to demonstrate how requirements will be implemented during Project phases;

Engagement shall be planned according to the stages of the Project including pre-construction, construction, and post-construction and shall focus on the issues listed below:

- Cultural heritage
- Disruption to utilities and services
- Employment
- Health, safety and security
- Additional land take
- Project information
- Stakeholder engagement and stakeholder feedback and grievances
- Traffic management

These engagements shall include:

- Face to face information dissemination meeting with local leadership and other key authorities
- Community/group meetings or information sharing on topics of community concern
- Targeted and appropriately designed activities shall be conducted to engage vulnerable groups and individuals

The social filed specialsit shall maintain a daily site presence to ensure easy access for the com-munity during construction. The frequency of engagements is according to the schedule of construction activities. Information dissemination tools will be used to support SE activities for example: distribution of printed materials (leaflets, posters, etc.).

By the completion of construction phase Contractor stakeholder engagement activi-ties should have ensured:

- All commitments were met and were in line with expectations
- Stakeholders (particularly land tenure holders and regulators) are satisfied with outcomes
- Minimal Project delays caused by unhappy or disaffected stakeholders
- All engagement has been fully documented

It is commitment of the Contractor to building trust with its Stakeholders for this work through regular and transparent communication and consistent actions. By actively engaging with the Stakeholders, Contractor strives to understand and address their interests and concerns and develop mutually beneficial outcomes. Table below summarizes Contractor's outreach activities with its key Stakeholder groups.

*Table 5:Contractor's SE activities*

| Stakeholders | Engagement Activities | Engagement in Practice |
|---|---|---|
| **Stockholders and Investment Community** | dialogue, meetings and consultation; reporting on Contractor's performance; | Work closely with NGOs such as the Interfaith Center on Corporate Responsibility (Contractor Adopts Human Rights Policy).<br>Actively promote Stockholder dialogue with Board members. |
| **Neighbours and Local Communities** | Town hall meetings; community advisory panels; facility tours; educational workshops; participation in community activities and events; social investment initiatives; charitable giving programs; local emergency response planning; annual reports on Contractor's performance. | Support our communities through volunteerism activities and charitable giving.<br>Participate in community advisory panels to discuss HES improvements, performance and other items of interest with stakeholders.<br>Assess community concerns and interests at the outset of new and existing projects (Building for the Future). |
| **Governments** | Interaction with host governments and regulatory agencies, including facility tours and inspections; data collection and consultation; legislative and regulatory development; voluntary initiatives; regular reporting on Contractor's performance; participation in conferences, fora and workshops. | Promoting the Voluntary Principles on Security and Human Rights.<br>Supporting government programs that encourage job creation for Albanian citizens. |

| Stakeholders | Engagement Activities | Engagement in Practice |
|---|---|---|
| **Civil Society Organizations and Educational Institutions** | Partnerships; memberships; regular dialogue and consultation; social investment initiatives. | Enhancing career opportunities for students and recent graduates (Encourage girls to Pursue Science Careers).<br>Protection of biodiversity and supporting education.<br>Supporting youth development programs in Albania (Social Research to Broaden Knowledge of Family Life).<br>Working with local community action councils before initiating new projects in Albania to enhance local hiring opportunities. |
| **Contractors and Suppliers** | Initiatives to support development of local supply content; training courses; HSE scorecards; Safety leadership program; Performance management program; Contractor/ SubContractors' qualification processes; regular business-to-business communications. | Purchasing from local suppliers.<br>Supporting human rights awareness among Contractor/ SubContractors' personnel.<br>Engaging proactively with Contractors/ SubContractors on business and HSE performance.<br>Promoting safe work practices. |
| **Employees** | Employee development programs; Wellness program; Talent Management System; educational assistance; training courses; employee committees and networks; feedback meetings; intranet resources; employee volunteerism. | Enhancing employee training, education and development.<br>Hiring local citizens in Albania and training them in relevant disciplines.<br>Supporting early-career engineers and their initiatives to mentor local students. |
| **Construction Industry Partners** | Partnerships; memberships; trade associations; participation in construction industry initiatives, outreach and knowledge sharing forums. | Supporting responsible business practices through membership and collaboration with construction industry groups.<br>Implementing voluntary initiatives to enhance product stewardship. |

In order to appropriately tailor its actions to the communities in which Contractor shall operate, Contractor's business management at each location leads its Stakeholder engagement and local community development initiatives. While Contractor's social and economic development efforts vary with the diversity of its business locations, Contractor's commitment to positive community outreach and impacts applies throughout its operations in Albania.

The action plans per phase will be developed in complete form afterwards the undertaking of project by the Contractor.

## Schedule of Activities

Table below summarizes scheduled activities per project phase with its Stakeholder groups.

*Table 6:Schedule of Activities*

| Project Phase | Stakeholders Groups | CSR Principles | Engagement Tools |
|---|---|---|---|
| Construction Activity | Stockholders/ Investors | • In accordance to regulations<br>• Protection of human rights<br>• Risks | • Reporting process to regulators<br>• Line Base studies and evaluation of impact on human rights<br>• Financial information provided in a presentation or general periodic meetings |
| | Management | • Safety<br>• In accordance with regulators | • Training of CSR in strategy development to incorporate the CSR in the corporate culture |
| | Employees | • Safety<br>• Quality of life (salary, location etc.)<br>• Environmental and cultural awareness | • Satisfaction questionnaires<br>• Training programs specific to site |
| | Partners | • In accordance with regulators<br>• Protection of human rights | • Reporting process to regulators<br>• Financial information provided via presentations in annual meetings |
| | Contractors and SubContractors | • Safety<br>• Training<br>• Local contracting | • Declaration of local Contractors and suppliers |
| | Suppliers | • Safety<br>• Origin of product | • Declaration of sustainable value chain |
| | Local, regional and national governments | • Safety<br>• Emergency planning<br>• Training of social network (doctors, police etc.) to support activities on the field | • Workshops on key matters where the existing resources are inadequate for the health and welfare standards of the project. |
| | Regulators | • Safety<br>• Base líne and studies of social, environmental and health impact<br>• In accordance to regulators | • Constant engagement and on site visits |
| | Civil Society | • Base Line and studies of social, environmental, health and human rights | • Participation in line base Studies<br>• Sharing of data<br>• Evaluation of impact |

| Project Phase | Stakeholders Groups | CSR Principles | Engagement Tools |
|---|---|---|---|
| | Communities | • Consulting capabilities<br>• Employment<br>• Training<br>• Local contracting<br>• Safety<br>• Base Line for social, environmental and health<br>• Evaluation of environmental, social and health impact<br>• Financial planning<br>• Protection from substance abuse (drugs and alcohol)<br>• Community investment programs | • Training in environmental programs<br>• Environmental monitoring<br>• Participation in base line studies<br>• Sharing of Data<br>• Integral Evaluation of impact |
| | General Public | • In accordance with regulators<br>• Environmental, social, health and human rights impact<br>• Programs of community investment | • Report to regulators |
| Completion and Reclamation (C&R) | Stockholders/ Investors | • Protection from environmental pollution<br>• Protection of human rights | • Environmental and Social Awareness and Strategy |
| | Management | • Safety<br>• In accordance with regulators | • On-site evaluations and long term ecological health monitoring programs |
| | Employees | • Safety<br>• Training in alternative skills to ensure employment after project completion | • Development of a training program for alternative employment skills |
| | Partners | • Protection from environmental pollution | • On-site evaluations |
| | Contractors and SubContractors | • Safety<br>• Training in alternative skills to ensure employment after project completion | • Development of a training program for alternative employment skills |
| | Suppliers | • Training in alternative skills to ensure employment after project completion | • Development of a training program for alternative employment skills |
| | Local, regional and national governments | • Long term commitment to social and infrastructure programs | • Development and monitoring of Sustainability Plan |
| | Regulators | • In accordance with regulators | • Commitments |
| | Civil Society | • Environmental pollution<br>• Long term social viability | • Continuous reporting on environmental and social issues |

| Project Phase | Stakeholders Groups | CSR Principles | Engagement Tools |
|---|---|---|---|
| | | | • Continuous sharing of monitoring data |
| | Communities | • Protection of the environment<br>• Continuous support for social programs. | • Participation in continuous monitoring programs |
| | General Public | • Evaluation of environmental and social risks | • Continuous reporting on environmental and social issues |

**Public consultations**

Public will be held before starting construction activities , during performing activity and in the end of completion of works on site related to Environmental and Social Impact Assessment , ESMP-s, RAP procedure , Stakeholder Engagement etc.

During public and Stakeholder engagement and consultation, some Stakeholders may be expressed safety concerns regarding the technical characteristics of the project, because of the unique underground location and its design. Contractor will organize public presentations of the project for the population living in the location of the project. Mitigation measures which will be undertaken to ensure there will be no risks for the cities supply will also be addressed at the presentations. Interested participants will be invited to presentations.

The houses which are located in the immediate vicinity of the works, in the Villages closed to works will be most impacted by construction activities (i.e. increased traffic, dust and noise) and will be consulted regarding acceptable mitigation measures, before the finalization of this Plan.

Contractor will organize an open house meeting and household will be invited to the meeting.

For the purpose of constructing, some land will need to be acquired mainly from private owners. Contractor will organize individual meetings with affected individuals. During construction, grievances in relation to construction activities will be managed by Contractor's accountable persons and construction SubContractor(s).

Contractor will be responsible for handling and processing grievances and will have to address grievances if the SubContractor(s) fails to do so.

Residents of the villages near to construction activities will be informed about the Contractor's contact information before construction begins, through the local media and announcements in public places.

## 7.3 Inspection, monitoring and auditing

**Inspections**

The PM (Project manager ) shall meet with the ES field specialist (Environmental and social ) either on the last working day of the week or as early as possible on the first working day of the week. The purpose of the meeting shall be to develop a weekly environmental and social inspection plan . It shall contain the locations of planned inspections as well as the number of inspections at each location.

The following factors shall be considered when targeting the inspection effort and preparing the weekly environemtnal and social inspection plan:

- Locations and types of planned construction-related activities for the week ahead
- Any new works fronts that shall be opening up during the week ahead

- Work Teams that are responsible for work with the highest potential risk of impacts

Environmental Inspection are recomended to be perfomrmed at each of the following phases:

  - Pre-construction
  - Construction
  - Post-construction
- Specific inspcetion related to impact mitigation measures for:
  - Quarries
  - Surplus natural material disposal
  - Road-widening
  - Bridge construction
- Site inspections to ascertain implementation and compliance status of:
  - ESMP / sub-plans/procedures
  - ESCH impact mitigation measures from method statements and site ES assessment reports
  - ES legal obligations

**Conducting the daily ES site inspections**

All active work sites shall be inspected daily. ES personnel shall use the pro-forma ES site daily inspection checklist.

Any person working on the Project is obligated to instigate a work stoppage (when it is safe to do so) if they believe that an ES incident is imminent, or is in the process of occurring.

**ESCH incident reporting and investigation**

Definition of "ESCH Requirement": all environmental permit conditions; all environmental, cultural heritage and social laws; any environmental, cultural heritage and social implementation plan, sub-plan or ESCH procedure; the Environmental and Social Impact Assessment; and the EBRD E&S Performance Requirements/IFC E&S Performance Standards applicable to the Project.

**Definition of an ESCH incident:**

- Failure to meet an "ESCH Requirement" of the project; or
- A situation including material damage to (or a reasonable expectation of) an environmental, cultural heritage or socio-economic receptor; or
- Intentional disregard of project standards which may lead to material ESCH damage; or
- Continuously recurring situations that have not yet resulted in clearly identified ESCH damage, but which require preventive and/or corrective action to prevent future material ESCH damage that is likely to result were the recurring situations left without intervention

All inspection findings that are incidents, hazards or observations shall be considered to be opportunities for improvement (OFIs).

*Table 7:Classification of ESCH*

| OFI<br>Opportunities for improvement | Definition |
|---|---|
| **Incident** | See definition |
| **Hazard** | Non-fulfilment of an ESMS procedural requirement which is not an "ESCH Requirement" (see definition) but is still a requirement that the Contractor is obligated to meet (as it has been stated by Company or Contractor in a policy, procedure or other document e.g. international good practice). A hazard may be a specific situation that was originally classified as an observation but became higher risk due to a pattern of recurrence or increased severity of potential ESCH consequences. |
| **Observation** | A situation that, if properly addressed, can reduce an ESCH risk or improve ESCH performance. Issues raised as observations are not serious enough to be considered an incident or hazard *but may become so if left unattended*.<br>**Note:** Observations can also be used in order to bring attention to an ESCH issue which is outside the scope of the inspection during which it was identified. |

The environmental and social field specialist shall populate the following data fields in the inspection report :

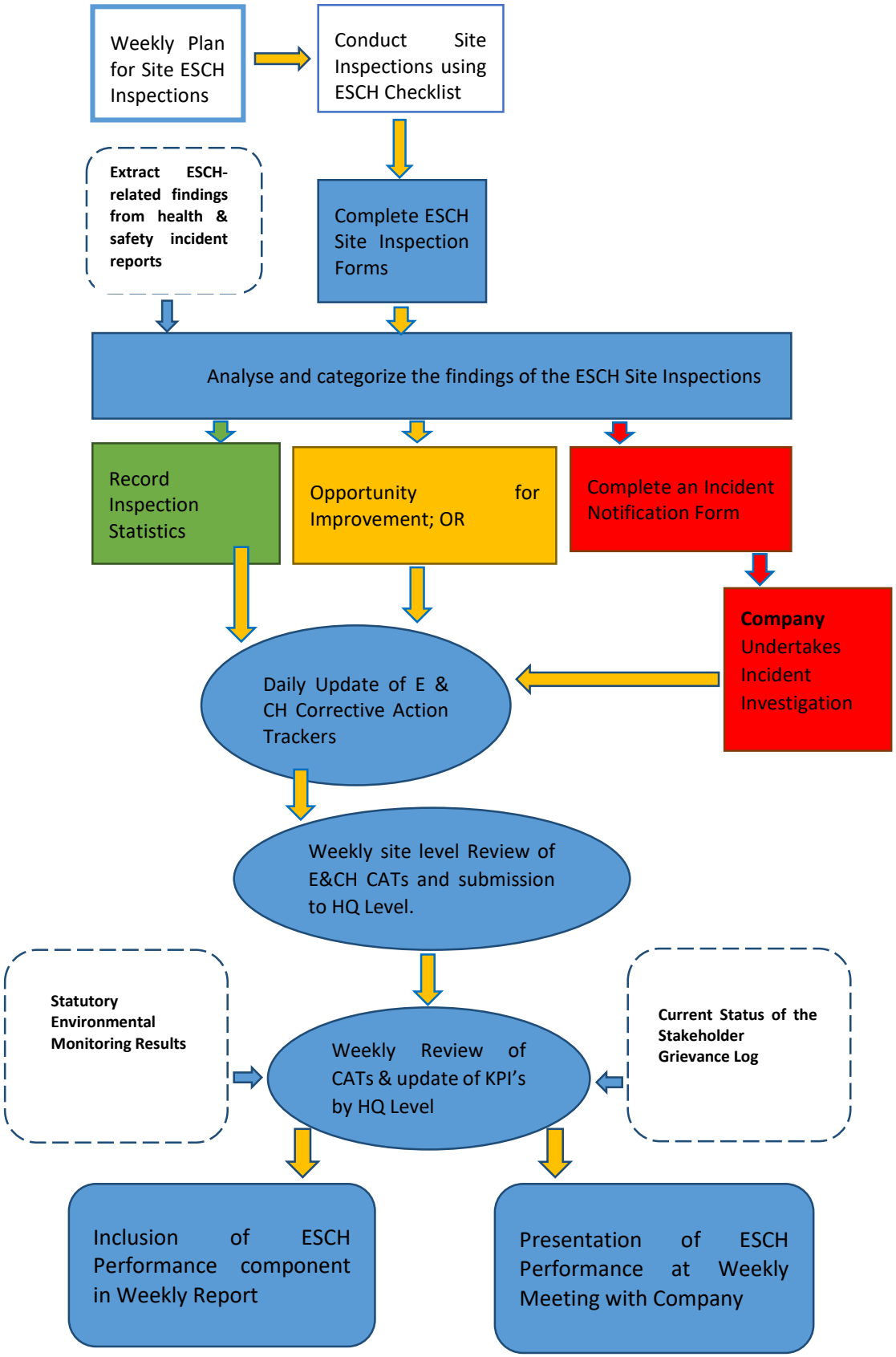
- Date that the finding was made and an adequate description of the activities and actual, or potential, ESCH impacts
- Suggest immediate and short-term (corrective) actions as well as measures to prevent a future recurrence (preventive actions) and dates for completion
- Identify a responsible person for each action. There may be multiple actions per finding in which case each action must be assigned to a responsible person.
- Insert photographic evidence with each finding
- Classify each finding as either incident, hazard or observation and record this in the appropriate data field
    - ➢ Weekly ESCH reporting to HQ level of the Company (Environmental and social manager)

The Site level report weekly to the HQ level shall comprise:

- The number and location of ESCH inspections for the past week
- The number of incidents identified during the past week
- The number of hazards identified during the past week
- The number of observations raised during the past week
- The total number of "open" corrective actions and preventive actions
- The date on which an action was opened and the date when it was closed. This will provide information about areas where there is difficulty resolving ESCH compliance problems.

- Any statutory monitoring results that are legally non-compliant for the period(i.e. water quality)
- Grievance Log status for the period
- Cultural heritage "chance finds" during the period
- Any other metrics related to ESCH key performance indicators (KPIs) that may be required by the HQ level or Company
    - Monthly ESMS management review

The ESMS shall be reviewed formally by the Contractor at a monthly meeting during roll-out and early implementation. This shall be extended to quarterly once it is successfully embedded. One of the standing agenda items at the meeting shall be ESCH performance as documented in the weekly report and reported at the weekly meeting with the Company. At the monthly management review meeting the effectiveness of the ESMS (as partially reflected in the inspection and monitoring results) shall be formally reviewed. The E&S Manager shall ensure that appropriate information is collated ahead of the monthly MR meeting so that this agenda item may be adequately addressed by senior personnel in this forum.
Main steps of the ESCH site inspection and reporting process:


Weekly Plan for Site ESCH Inspections
Conduct Site Inspections using ESCH Checklist
Extract ESCH-related findings from health & safety incident reports
Complete ESCH Site Inspection Forms
Analyse and categorize the findings of the ESCH Site Inspections
Record Inspection Statistics
Opportunity for Improvement; OR
Complete an Incident Notification Form
Company Undertakes Incident Investigation
Daily Update of E & CH Corrective Action Trackers
Weekly site level Review of E&CH CATs and submission to HQ Level.
Statutory Environmental Monitoring Results
Weekly Review of CATs & update of KPI's by HQ Level
Current Status of the Stakeholder Grievance Log
Inclusion of ESCH Performance component in Weekly Report
Presentation of ESCH Performance at Weekly Meeting with Company

### Internal and External Audit

Contractor shall conduct internal audits within its functions and levels (including plant installations etc.) at planned intervals to the requirements of ESMP requirements established by the Client/ADF and it is effectively implemented and maintained.
Audit programs shall be planned, taking into consideration the status and importance of the processes and areas to be audited (including SubContractors), as well as the results of previous audits or any other information and data required. The audit criteria, scope, frequency and methods shall be clearly defined.
Critical audit/ inspection areas (related to the project) to be monitored, refer to physical, chemical or ecological parameters (such as noise, water, biodiversity), social performance, grievance management, Corrective Action Requests, as well as lessons learned from audits.
Selection of auditors and conduct of audits ensures objectivity and impartiality of the audit process. Auditors shall be competent and skilled and they will not audit their own work and wherever possible, independence shall be followed to the environmental, cultural heritage, social and H&S audit performance.
The management responsible for the area being audited shall ensure that actions will be taken without undue delay to eliminate detected nonconformities and their causes. Follow-up activities include the verification of the actions taken and the reporting of verification results.

Results of CONTRACTOR's audits and inspections shall be included at the Weekly and Monthly Progress Reports .

## 7.4 Reporting

### Monthly Reports

The monthly reports shall include information and data regarding the following:

- Training undertaken.
- Implementation of the Stakeholder Engagement and CSR , Employment, Training and Worksite Management plans to include the following information: performance against any Key Performance Indicators (KPIs) set, the number of workers, their names and age, where they work, their hometowns, number of men and women, positions, classification as skilled, semiskilled or unskilled positions and issues or feedback received.
- Details of local purchasing in accordance with the Employment, Training and Worksite Management Plan (suppliers, amount, payments, etc.), and the Stakeholder Engagement plan including any difficulties or problems developed through its commercial affairs with local suppliers or in finding local suppliers for a specific good or service.
- Waste Monitoring Report, which shall include a summary of the quantity of wastes stored, transported and disposed by waste stream, the quantity of waste re-used, recovered or recycled and the results of reconciliation of transport and disposal records and any discrepancies identified.
- Results of audits and inspections undertaken by Contractor, non-conformances identified and corrective actions taken.
- Work Improvement Notices (WIN), Corrective Action Requests and Temporary Work Suspension (TWS) Notices issued and progress towards close-out.
- Incidents, incident investigations and implementation of lessons learnt.
- Contact log and correspondence.
- Performance in relation to KPIs.

**Weekly Reports**

The weekly reports shall include information and data regarding the following:

- Permit register, progress of permit applications and discharge of conditions.
- Progress of the provision of all necessary information to the Client from the Company to obtain regulatory permits and approvals.
- Progress of the preparation, acceptance and implementation of ESMPs
- Status of compliance with all ESMP, including a detailed report of any instances of non-compliance.
- Progress made on grievances, including any feedback received and progress of resolution, as per the Client ( Grievance Mechanisms) (which will be implemented by the CONTRACTOR).
- Update on interaction with all stakeholders (including landowners and communities) and any requirements for community or landowner liaison or agreements.
- Environmental and social monitoring undertaken in accordance with the Monitoring Plan and the results received.

**Annual and Semi-Annual Reports**

The Annual and Semi-Annual shall include information and data regarding the following:

- Implementation and institutional arrangements
- Performance evaluation of the company
- KPI evaluations /updating
- Management review
- Monitoring and reporting arrangements for environmental monitoring
- Social contribution activities
- Update on RAP and implementation status
- Summary of land acquisition (temporary / permanent)
- Details of ownership of land
- Status of Affected People: Land Requirement, Compensation and Rehabilitation (systems, Plans, Details of affected persons, Validation and Verification of Affected persons (APs), compensation decided / planned and progress on provision of compensation)
- Compliance status – loan covenants, policy frameworks
- Gender Action Plan (Activities during the period)
- Public consultations and disclosures

## 7.5 Accidents, Incidents, Non-Conformity, Corrective, Preventive Action and Accident Investigation

**Recording and Logging**

Contractor shall develop and implement procedure(s) to record, investigate and analyse incidents (accidents, near misses etc.) in order to:

- determine underlying Occupational H&S deficiencies, environmental aspects and other factors that might be causing or contributing to the occurrence of incidents;
- identify the need for corrective action;
- identify opportunities for preventive action;
- identify opportunities for continual improvement;

- communicate the results of such investigations.

The above investigations shall be performed in a timely and efficient manner.

Any identified need for corrective action or opportunities for preventive action shall be dealt with in accordance with the relevant procedure(s) that will be developed for the project, which shall define requirements for:

- identifying and correcting nonconformity(ies) and taking action(s) to mitigate their Occupational H&S consequences and their environmental impacts;
- investigating nonconformity(ies), determining their cause(s) and taking actions in order to avoid their recurrence;
- evaluating the need for action(s) to prevent nonconformity(ies) and implementing appropriate actions designed to avoid their occurrence;
- recording and communicating the results of corrective action(s) and preventive action(s) taken;
- reviewing the effectiveness of corrective action(s) and preventive action(s) taken.

Where the corrective action and preventive action identifies new or changed hazards or the need for new or changed controls, the proposed actions shall be taken through a risk assessment prior to implementation.

Any corrective action or preventive action taken to eliminate the causes of actual and potential nonconformity(ies) shall be appropriate to the magnitude of problems and commensurate with the Occupational H&S risk(s) and environmental impacts encountered.

All incidents, including human rights incidents, shall be reported by Contractor in accordance with Client 's HSE Data, Incident Reporting and Investigation.

For incidents involving Contractor's personnel, Contractor's management shall conduct an internal incident investigation.

Contractor shall report all incidents and accidents in accordance with given requirements. Details of accidents, other than minor first aid, shall be reported immediately by the Environmental and Social field officer to Contractors 's top management(ES manager), followed by completion and distribution of an initial incident report and a subsequent supervisor's report. Incidents of major potential or of special features may be subject to a separate investigation and report.

A log of all first aid treatments shall be maintained at Contractor's site premises. The log shall contain as a minimum the following information:

- Circumstances of the incident
- Date, time, and location of fall, and during which shift and on what unit the fall occurred
- Witnesses', staff members', and resident's accounts of the incident
- Interventions taken to care for the resident immediately after the incident
- Notifications made as a result of an incident
- Resident symptoms prior to the incident
- Vital signs and observations made after the incident
- Resident activity at the time of the incident
- Injuries/medical problems associated with the incident
- Environmental hazards or faulty equipment contributing to the incident
- Presence of any new incident risk factors
- Corrective actions taken to reduce the likelihood of another incident

Review of the log, follow-up actions, investigation reports and corrective actions taken are of vital importance, since they may lead to changes in the ESMS elements, risk assessments, emergency response action plans etc.

All incidents resulting in harm to people, industrial illness, damage to assets, and environmental harm (together with near miss events in these categories) shall be reported within 24 hours to the Client . All incidents that are extreme or high potential severity risk (as stated at the COMPANY's HSE Data, Incident Reporting and Investigation) shall be reported to Senior Management as soon as possible, but at most within 1 hour. Contractor shall fully co-operate with and provide staff as requested by the Client to participate in incident investigations.

Furthermore, when Corrective Action Requests, WINs(Work improvement notic) and TWS Notices (temporary work suspension notice ) issued by the supervizor to the Contractor, the following actions shall be taken by the Contractor:

- If a Corrective Action Request is issued, Contractor shall proceed in remedial actions at once, in order to close out in the shortest time (depending on the major non-compliance).
- If a WIN is issued, Contractor shall deal with it within 24 hours (if immediate action is required) or in a greater period –as agreed- to close out (depending on the minor non-compliance).
- If a TWS Notice is issued, Contractor shall immediately proceed in relevant actions and shall not resume work halted until the Client 's Representative verifies that all conditions that prompted the Notice have been addressed or corrected to the satisfaction of the Clinet. Any staff employed by Contractor who ignores or violates a TWS Notice will be subjected to disciplinary action that may include dismissal from the Project.

**Control of records**

It is contractor's policy to develop and maintain documented corporate records to be used as objective evidence that the works performed and the activities carried out, comply with ESMS requirements.

Contracts, Work Instructions, Procedures, Materials'/ Equipment's Certificates of conformity, Lab and Test reports, Audit reports, Nonconformance reports, Accident/ Incident reports, Suppliers evaluation sheets, Corrective Action reports etc. after completion of the relevant work become objective evidence and constitute Contractor's ESMS records.

ESMS records shall be identified when applicable by subject; they will be kept in hard copies or/ and into the computer in such a manner as to be readily available when requested.

Therefore, Contractor shall develop, implement and maintain procedure(s) for the identification, storage, protection, retrieval, retention and disposal of ESMS records.

Relative records shall be always available to the Client or the Third Party, which is involved in the Project. Further to that, the Environmental and Social Manager keeps the confidentiality of respective records (e.g. accident reports) for being available only to authorized or governmental personnel.

All records shall be legible, identifiable, traceable, stored and maintained in such a way that they will be readily retrievable, using facilities that provide suitable environments to minimize deterioration and prevent loss.

# 8. APPENDIXES

## Appendix1: Pro-forma ESCH site daily inspection checklist and reporting form

| No. | ASPECT | Location | O/H/I* | DESCRIPTION | ACTION (Done/ To be done) |
|---|---|---|---|---|---|
| **POLLUTION PREVENTION** | | | | | |
| 1 | Are any fuels, lubricants or chemicals not stored within the centralised 'bounded' area stored in such a way that they do not pose a risk to the receiving environment i.e. drip trays /secondary containment? | | | | |
| 2 | Are drip trays/pans utilised to contain leakage of hydrocarbons from static items of plant such as generators and pumps and kept drained of rainwater at all times? | | | | |
| 3 | Is refuelling of static and mobile plant carried out in designated areas at least 50m from drains, water bodies and wetlands? | | | | |
| 4 | Are all items of plant attended during refuelling operations and are all hoses, valves and delivery nozzles on refuelling 'bowsers' regularly checked for signs of wear and turned off and locked when not in use? | | | | |
| 5 | Are there adequate supplies of absorbent materials and pollution clean-up equipment available at the following locations: refuelling 'bowsers', all construction crews within the project area? | | | | |
| 6 | Have all leaks and spills of hydrocarbons and chemicals been reported and dealt with in accordance with project procedures? | | | | |
| 7 | Is the use of concrete/cement adjacent to any given water body controlled so as to prevent discharge of pollutant into the water bodies? | | | | |
| 8 | Are all 'best practicable means' to control dust emissions to air adopted i.e. covering of haul lorries, careful management of stockpiles of fine materials, suppression of dust along the project area by controlled water spraying, (especially within 500m of residential areas), adherence to site speed limits? | | | | |
| 9 | Are all public highways and hard standing areas kept clear of mud deposits and dusty materials? | | | | |
| 10 | Are all mitigation measures for prevention of noise pollution followed during all construction activities in the vicinity of noise sensitive receptors i.e. residential dwellings, schools? | | | | |

| No. | ASPECT | Location | O/H/I* | DESCRIPTION | ACTION (Done/ To be done) |
|---|---|---|---|---|---|
| **WASTE MANAGEMENT/HOUSEKEEPING** | | | | | |
| 11 | Is each waste produced on site and site compound locations stored in a safe and environmentally sound? | | | | |
| 12 | Are all waste containers clearly labelled and identified so that they accurately describe the type of waste contained? | | | | |
| 13 | Is all waste stored in a secure manner to prevent: accidental spillage, leachate to ground, and removal by wind, scavenging by wild animals etc.? | | | | |
| 14 | Are all storm drains and surface waters kept clear and free of waste materials? | | | | |
| 15 | Is surplus trench excavation material/spoil disposed of in accordance with Project requirements (Soil Management Plan)? | | | | |
| 16 | Are all movements of waste being documented and monitored in accordance with Waste Management ESIP and Waste Management procedure? | | | | |
| **TOPSOIL/SUBSOIL STORAGE AND HANDLING** | | | | | |
| 17 | Is topsoil stripping carried out in accordance with guidelines laid down in the method statement? | | | | |
| 18 | Is stripped topsoil appropriately segregated from excavated subsoil especially in areas of deep excavations i.e. road and near water bodies? | | | | |
| 19 | Are adequate measures in place to protect topsoil storage mounds from wind and rain erosion? | | | | |
| 20 | Are topsoil storage mounds kept free from construction traffic and compaction? | | | | |
| 21 | Are adequate gaps left in topsoil storage mounds within river floodplains to allow for passage of floodwaters during inclement weather conditions, and is topsoil stored a minimum of 5m from the top of any given watercourse bank? | | | | |
| 22 | Are all-practicable measures implemented to prevent water 'ponding' on the especially against the topsoil mound? | | | | |
| 23 | Where only part of the working area is stripped i.e. areas of archaeological importance or wetlands, is the remaining in- situ topsoil adequately protected? | | | | |
| 24 | Is excavated material backfilled in accordance with the method statement? | | | | |

| No. | ASPECT | Location | O/H/I* | DESCRIPTION | ACTION (Done/ To be done) |
|---|---|---|---|---|---|
| **TREES** | | | | | |
| 25 | Have all trees that are to be felled within the project area been clearly marked to avoid unauthorised removal? | | | | |
| 26 | Are all trees retained within the project area or adjacent protected from damage by construction activities i.e. protective fencing, and prohibition of topsoil stripping within the canopy spread? | | | | |
| **WORKS AT WATER BODIES** | | | | | |
| 27 | Are temporary culverts installed for vehicular movement of adequate diameter to maintain current and anticipated water flow capacity? | | | | |
| 28 | Are the ends of temporary culverts kept clear of all debris and blockages so as to maintain free and normal water flow levels? | | | | |
| 29 | Are adequate measures in place and maintained i.e. sandbag/straw bale bunds, around the temporary culvert/running track interface to prevent run-off from the project area entering water bodies? | | | | |
| 30 | If prefabricated portable section bridging systems are installed, have measures (i.e. kick boards) been put in place to prevent ingress of mud from machine tracks into the watercourse? | | | | |
| 31 | If concrete is used adjacent to watercourse crossing points, are measures implemented to prevent ingress of concrete/cement into the watercourses? | | | | |
| **PROTECTED AREAS AND SPECIES** | | | | | |
| 32 | Are all measures in place to prevent unauthorised off easement access by Project personnel and machinery into Protected Areas adjacent to the working area? | | | | |
| 33 | Were any measures taken to protect the project area by wild animal's access? | | | | |
| **EROSION CONTROL** | | | | | |
| 34 | Were the adequate erosion preventing measures taken according to the Erosion Control and Reinstatement ESIP? | | | | |
| 35 | Have all required temporary sediment barriers i.e. silt fences/straw bales been installed, regularly inspected and maintained as per Project requirements? | | | | |
| **REINSTATEMENT** (This process isn't performed yet) | | | | | |

| No. | ASPECT | Location | O/H/I* | DESCRIPTION | ACTION (Done/ To be done) |
|---|---|---|---|---|---|
| 36 | Are benched side slopes re-graded to original profiles as per project requirements? | | | | |
| 37 | Is topsoil being reinstated in accordance with guidelines as set out in the Reinstatement Plan and Procedure? | | | | |
| 38 | Is mulching and/or biodegradable 'jute matting' being applied and maintained on reseeded slopes as necessary and in accordance with Project requirements? | | | | |
| 39 | Are riverbanks at crossing points reinstated in accordance with Project drawings? | | | | |
| 40 | Are designated 'Special Areas' reinstated in accordance with Contractor Site-Specific Method Statements and Procedures? | | | | |
| 41 | At locations where there is livestock present adjacent to the project area, are planted areas stock-proof fenced or protected by other means and inspected regularly? | | | | |
| **CULTURAL HERITAGE** | | | | | |
| 42 | Are all cultural heritage sites protected and all measures taken (protection signage) in compliance with Cultural Heritage ESIP? | | | | |
| 43 | Do construction vehicles respect identified archaeological sites and not drive off road close to them or outside of the project footprint in case there is unknown cultural heritage? | | | | |
| 44 | Are all ground clearance and ground breaking construction activities supervised and monitored by CHM? | | | | |
| 45 | Are the appropriate strategies, such as water spraying and coverings used in cases of dust, soot or mud from earthworks (if identified by CHM as an issue)? | | | | |
| 46 | Are mitigation measures from negative aesthetic impacts, such as noise-reducing barriers, low-profile constructions, sighting and location to maximise the use of topography and vegetation, screening taken for cultural heritage sites? | | | | |

## Appendix 2: Pro-forma ESCH Incident Notification form

| DATE OF EVENT | TIME OF EVENT | LOCATION OF THE EVENT |
|---|---|---|

| | | | |
|---|---|---|---|
| | | | |
| Was the event an: Please check the appropriate | ☐ Incident | ☐ Accident | ☐ Near miss |
| CLASSIFICATION OF THE EVENT | | | |
| Level 1 – High Severity | Level 2 – Medium Severity | Level 3 – Low Severity | |
| TYPE OF EVENT | | | |
| ☐ Fuel spill | ☐ Chemical spill | ☐ Water release (muddy, contaminated) | ☐ Breach of licence conditions |
| ☐ Uncontrolled air emission | ☐ Waste Management | ☐ Fire explosion | ☐ Excessive vegetation clearance or damage |
| ☐ Damage to cultural heritage items/ area | ☐ Excessive noise | ☐ Protected vegetation damage | ☐ Fauna injury |
| ☐ Soil slippage | ☐ Wastewater discharge | ☐ Additional land take | ☐ Infrastructure and Utilities |
| ☐ Near miss | ☐ Other | | |
| TYPE OF IMPACT | | | |
| ☐ General environmental and social effects (to be used where other categories do not apply) | | | |
| ☐ Pollution of water courses, surface water drains, sewerage | | | |
| ☐ Contamination of land | | | |
| ☐ Controlled and uncontrolled emissions to atmosphere | | | |
| ☐ Noise, dust, vibration and odour | | | |
| ☐ Solids and other wastes | | | |
| ☐ Flooding | | | |
| ☐ Erosion | | | |
| ☐ Effects on the natural environment | | | |
| ☐ Archaeological, heritage or cultural Issues | | | |
| ☐ Use of land, water, fuels and energy, and other natural resources | | | |
| ☐ Legal | | | |
| ☐ Public / Media | | | |
| ☐ Other (Please specify) | | | |
| PEOPLE AFFECTED BY THE EVENT | | | |
| | | | |
| FURTHER DETAILS ON THE NATURE OF THE RISK<br>(E.g. Describe the potential or actual impact on the environment or local features; is any waterway at risk and how near is it; what volume of substance was discharged; what was the hazardousness of the substances involved, etc.) | | | |
| | | | |

| |
|---|
| |
| DESCRIBE WHAT HAPPENED (Give as much detail as possible, e.g. the name of any substance involved; what happened leading up to the event; the part played by any people including third parties; the names of any witnesses; any action taken at the time of the event.) |
| |
| LESSONS LEARNED (Give details on what was learned from this experience and suggest way(s) to improve this process in order to avoid the event from happening again.) |
| COMPLETED BY |

| Name | Signature | Position | Date |
|---|---|---|---|
| | | EFC / EFO / CLO / CHCC | |
| APPROVED BY | | | |
| Name | Signature | Position | Date |
| | | Block Operations Manager | |

| PREVENTATIVE OR CORRECTIVE ACTION IDENTIFIED AND AGREED | | |
|---|---|---|
| Work Improvement Notice Issued? | ☐ Yes | ☐ No |
| Rectification / Rehabilitation required? | ☐ Yes | ☐ No |
| Training / Re-training required? | ☐ Yes | ☐ No |
| Action to be taken | | |

| | | | |
|---|---|---|---|
| By who | | | |
| Deadline for implementation | | | |
| COMPLETED BY | | | |
| Name | Signature | Position | Date |
| | | EFC / EFO / CLO | |
| APPROVED BY | | | |
| Name | Signature | Position | Date |
| | | Operation Block Manager | |

## Appendix 3:Pro-forma Environmental Corrective Action Tracker

| No. | Date Received | Location | Area | Brief Description | Classification of Findings (Observation/Hazard/Incidents) | Photos | Responsible Unit for Action | Action Owner | Proposed Resolution | Date Closed | Status |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | | | | | |