



Environmental and Social Requirement 4

# Health, safety and security



# I Health, safety and security

## Introduction

1. This Environmental and Social Requirement (ESR) recognises the importance of managing health, safety and security risks to project workers,<sup>45</sup> project-affected communities and consumers associated with project activities, in accordance with the hierarchy of risk controls.<sup>46</sup> When providing project workers with safe, healthy and secure working environments, clients will respect and promote the fundamental principles and rights of workers,<sup>47</sup> thus creating tangible benefits, such as enhancing the efficiency and productivity of their operations.
2. Project activities, equipment and infrastructure may increase the potential for worker and community exposure to health, safety and security risks, including those associated with mobilisation, construction, commissioning, operation, maintenance, decommissioning or closure, reinstatement, and the transport of goods and services.
3. The client has the primary responsibility for cooperating with key stakeholders and providing safe and healthy working environments for project workers and for informing, instructing, training, supervising and consulting project workers on health and safety. Project workers are responsible for cooperating actively with their employer and taking care of their own health and safety and the health and safety of others.
4. While acknowledging the role of the relevant authorities in protecting and promoting the health and safety of the public, the client has the duty of managing health, safety and security risks to project-affected communities.

## Objectives

5. The objectives of this ESR are to:
  - protect and promote the health, safety and security of project workers by ensuring safe, healthy and secure working environments and implementing a management system appropriate and proportionate to the risks associated with the project
  - identify, assess and manage health, safety and security risks to project-affected communities and consumers during the project lifecycle from both routine and non-routine activities and to incorporate health and safety at the earliest opportunity into the project design.

## Scope of application

6. This ESR applies to all projects financed by the EBRD as established in the Environmental and Social Policy. The client will, as part of its environmental and social assessment process, identify the relevant requirements of this ESR and how they will be addressed and managed throughout the project lifecycle. The potential risks to project workers and project-affected communities may vary according to the stage,

<sup>45</sup> Project workers as defined in ESR 2.

<sup>46</sup> The hierarchy of risk control refers to: (i) elimination of the risk; (ii) reduction of the risk by substituting the hazardous condition or substance with a non- or less hazardous substance; (iii) isolation of the risk to prevent exposure; (iv) introduction of engineering controls that protect the workforce and community collectively; and (v) provision of information, instruction and training to workers and communities, as appropriate, on risks, safe systems of work, emergency plans, reporting requirements and mandatory supervision.

<sup>47</sup> As guided by the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work (1998, as amended in 2022) and ILO Core Conventions:

C155 Occupational Safety and Health (1981)

C161 Occupational Health Services Convention, 1985 (No.161)

C167 Safety and Health in Construction Convention, 1988 (No. 167)

C187 Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187).

size and nature of the project, including mobilisation, construction, commissioning, operation, maintenance, decommissioning or closure, and reinstatement. Implementation of the actions necessary to meet the requirements of this ESR is managed as an integral part of the client's overall environmental and social management system (ESMS) and/or the project-specific environmental and social management plan (ESMP), as set out in ESR 1.

7. Detailed requirements for the prevention and control of risks to human health and impacts on the environment due to the release of pollution are found in ESR 3.

## Requirements

### General requirements for health and safety management

8. The client will adopt measures to identify hazards, assess risks and prevent accidents, injury and ill-health to project workers and project-affected communities occurring in, arising from or associated with carrying out project activities. Supported by qualified and trained health and safety advice that is proportionate to the risks, the client will prepare and implement preventative and protective measures and plans to manage health and safety risks in accordance with the hierarchy of risk controls and in accordance with good international practice (GIP).
9. The client will provide project workers and project-affected communities with relevant information, instruction and training on health and safety hazards, risks, protective and preventative measures, and emergency arrangements necessary for their health and safety throughout the project.
10. Where any accidents, injury, harassment (including gender-based violence and harassment [GBVH]) and ill-health occur in the course of works associated with the project, or there is the potential for such an incident, the client will investigate, document, analyse the findings, identify learning opportunities, adopt measures to prevent recurrence and, where required by law, notify and cooperate with the relevant authorities. The client will ensure appropriate financial compensation and support for any persons suffering injury or ill-health caused by project activities. Where the client has identified high risks to project workers and where there are gaps in coverage, benefits or access to national insurance systems, the client will implement group personal accident insurance.
11. As part of project performance monitoring, the client will ensure health and safety measures are included in relevant monitoring and reporting processes.

### Occupational safety and health

12. The client will provide all project workers with a safe and healthy working environment, taking into account inherent and foreseeable risks in its particular sector and specific classes of hazard that may be present, and also considering working conditions (including excessive or erratic work hours and overtime) that may contribute to a safety risk. The client will identify the safety and health hazards, assess risks and implement preventative control measures appropriate to the stage, size and nature of the project, in accordance with relevant substantive EU occupational safety and health (OSH)<sup>48</sup> standards and GIP. The client will undertake an assessment commensurate with the level of risk and develop a project specific OSH plan, where appropriate, that will be integrated into the ESMS. The plan will be in place prior to the start of any work and periodically reviewed to evaluate its effectiveness to confirm it remains appropriate to addressing related risks.
13. The client will plan and implement OSH arrangements with the assistance of a person responsible for OSH. Following the hierarchy of risk controls and where personal protective equipment has been identified as part of any preventative control measures, the client will provide gender-appropriate personal protective equipment (PPE) at no cost to project workers. The client will enable and require all project workers engaged to work on project sites or to perform work directly related to the core functions of the project to comply with the OSH plan.

48 EU OSH standards mean substantive requirements in EU legislation in the field of safety and health at work, setting out minimum safety and health requirements for the protection of workers.

14. During the course of any work activity, the client will ensure that all project workers have appropriate physical fitness to undertake their appointed job roles and are provided with: (i) a continued and appropriate level of supervision to ensure they do not place themselves or others at risk; (ii) safe work equipment; and (iii) OSH procedures, work instructions, information, appropriate training and workplace rules that are implemented and enforced. Where project workers place themselves or others at risk, the client will take proportionate disciplinary action to enforce workplace rules and, where necessary, ensure that they are immediately removed from the workplace until they are no longer a risk to themselves or others. The client will not impose financial penalties on workers for health and safety infringements.
15. The client will monitor the physical and mental health and wellbeing of its project workers using appropriate management arrangements and consult with project workers on OSH arrangements. The client will inform project workers of their rights, allow project workers to stop work in situations of danger to life or health, and will not require project workers to return to work until corrective action has been taken and is no longer a danger to life or health. The client will put in place procedures for workers to report any unsafe acts and unsafe conditions in the workplace to their immediate supervisor or other person with the relevant authority to take action. The client will not tolerate any form of retaliation or reprisal for reporting or stopping work.
16. The client will establish a workplace OSH committee with a balanced representation of management and elected workplace representatives that is diverse and inclusive and does not undermine any existing OSH committees or any existing collective bargaining agreements. The OSH committee will communicate, coordinate and cooperate on OSH matters in the workplace and this will include, but not be limited to, accident investigation, risk assessment, development of safe systems of work and selection of work equipment to manage OSH risks in accordance with the hierarchy of risk controls.
17. Where there are specific risks associated with certain work activities or work locations that could result in adverse effects on the health, safety and wellbeing of any vulnerable project workers based on age, sex, gender, sexual orientation, gender identity, gender expression and/or sex characteristics, disability or short- or long-term health conditions, the client will carry out more detailed risk assessments and make reasonable adjustments to prevent any vulnerability becoming worse or increasing the risk of injury and ill-health. The client will implement adjustments consistent with ESR 2 requirements on non-discrimination and equal opportunity.
18. The client will identify and assess gender-related risks that have specific physical, physiological and psychological effects on project workers. OSH hazards created by work activities, work equipment, tools and personal protective equipment because of a worker's gender are to be controlled in accordance with the hierarchy of risk controls, so that project workers are not at any greater risk of injury or ill health.

### **Community health and safety**

19. The client will identify and assess project-related risks to and likely adverse impacts on the physical health and safety of project-affected communities and will develop detection, protection, prevention and mitigation measures in accordance with the hierarchy of risk controls, proportionate to the impacts and risks, and appropriate to the stage, size and nature of the project. The client will communicate with project-affected communities and other relevant stakeholders, as appropriate, on prevention and mitigation measures and plans. These measures will be consistent with the hierarchy of risk control and GIP.
20. Measures to avoid or mitigate impacts of the project on community health and safety may be the responsibility of the relevant public authorities. Under these circumstances, the client will clarify its role and its responsibility to notify, coordinate and cooperate with the relevant authorities and put in place appropriate arrangements.

### **Gender-based violence and harassment and child sexual abuse**

21. The client will assess project-related risks of gender-based violence and harassment (GBVH) and risks of child sexual abuse to project workers and project-affected persons and communities. Measures to assess, mitigate, monitor and respond to GBVH and child sexual abuse will be based on the principles that (i) all forms of sexual exploitation, abuse and harassment (SEAH) are prohibited, and (ii) there is no tolerance for inaction to prevent, report or respond to SEAH, and no tolerance for retaliation against survivors or

witnesses. These measures should be integrated into existing processes and systems of occupational and community health and safety, as well as stakeholder engagement and grievance management. The client will adopt specific measures to prevent and address these risks, based on the needs of women, children and other at-risk groups. Such measures will be informed by relevant stakeholders and may include consultation with project workers and communities, the provision of information, training and confidential channels for reporting incidents in safe and accessible formats, including by children, codes of conduct for project workers, and the provision of support in a manner consistent with paragraph 19, above.

22. When responding to incidents or allegations of GBVH and child sexual abuse, the client will adopt a survivor-centred approach that prioritises the rights, needs and wishes of the person who has experienced GBVH and/or child sexual abuse,<sup>49</sup> as well as their safety. The client will provide survivors with or refer survivors to appropriate medical, psychosocial and judicial support services. Incidents and allegations of sexual exploitation and abuse associated with the project will be reported to the EBRD and addressed in a timely manner.

## Specific requirements for health and safety management

### Contractor and sub-contractor management

23. The client will assess the OSH standards and past OSH performance of contractors proposed to carry out work on the project site or those performing any work directly related to the construction and operation of the project. This will include confirming that the contractor has developed an OSH plan that identifies appropriate capacity, resources and arrangements to safely plan, manage, implement and monitor work under the project.
24. The client will periodically review and assess, through physical site visits, the contractors' OSH performance and the ongoing suitability of their OSH plans. The review and assessment will confirm that arrangements have been implemented in accordance with the hierarchy of risk controls, remain in compliance with this ESR and ESR 2, and remain appropriate to managing current health and safety risks. The client will include appropriate provisions in contracts that will; (i) permit the suspension of the contractor's work in the event of immediate danger to the life or health of any worker or project-affected communities, and (ii) require the contractor to make the workplace safe before works may be resumed.

### Infrastructure, building, and equipment design and safety

25. The client will undertake a risk assessment appropriate to the stage, size, nature and complexity of the project and incorporate health, safety and climate change considerations into structural elements or components during project design, construction, commissioning, operation, maintenance and decommissioning, in accordance with the hierarchy of risk controls and GIP. Structural elements or components will be designed and constructed by client-appointed, qualified and trained professionals and, where possible, hazards will be eliminated at the initial design stage.
26. Independent life- and fire-safety audits will be undertaken at the design stage for all new public buildings, areas of public gathering, such as transport hubs, and major refurbishments prior to their commissioning or use.
27. The construction and major refurbishment of buildings used for communal purposes will be designed in accordance with the concept of the principles of universal design<sup>50</sup> and made inclusive and accessible to all.
28. When structural elements or components of critical infrastructure are situated in high-risk locations and their failure or malfunction may threaten the health and safety of project workers and communities, the client will appoint one or more qualified and trained professionals with relevant and recognised experience in similar projects, independent of the design and construction teams. They will conduct a review as early

49 In responding to allegations of child sexual abuse, the client will work with an expert to carry out a best interest determination in line with UNHCR guidelines: [refworld.org/policy/opguidance/unhcr/2021/en/122648](https://refworld.org/policy/opguidance/unhcr/2021/en/122648).

50 The principles of universal design refer to safe and inclusive access for people of all ages and abilities in different situations and under various circumstances. They include: (i) equitable use; (ii) flexible in use; (iii) simple and intuitive use; (iv) perceptible information; (v) tolerance for error; (vi) low physical effort; and (vii) size and space for approach and use.

as possible in the project development phase and throughout the project design, construction, operation and commissioning stages to confirm the safety and structural integrity of such structural elements or components.

### **Hazardous materials safety**

29. The client will prevent or, where it is not practicable to prevent the risk completely, reduce the potential for worker and project-affected community exposure to hazardous materials<sup>51</sup> that may be released by the project by controlling exposure and adopting the hierarchy of risk controls.
30. Where there is the risk of any intentional or unintentional release of chemicals, energy or other potentially dangerous materials that will result in serious risk to project workers or project-affected communities during project implementation, the client will carry out a risk assessment at the initial design stage to eliminate the risk of release. The risk assessment will identify process safety concerns and address these through GIP and good engineering design prior to construction
31. Where hazardous materials are part of existing facilities or operations associated with the project, the client will exercise due care and implement appropriate measures to prevent, prepare, respond and learn when conducting commissioning, operating, maintenance and decommissioning activities in order to prevent the exposure of workers and project-affected communities to such hazardous materials. Where the use of such materials cannot be avoided, the client will take the necessary measures for safe handling, labelling, storage, transport and disposal in accordance with GIP.

### **Product safety**

32. Where the project involves production of and/or trade in consumer products, the client will ensure product safety through good design and manufacturing processes, as well as safe handling, labelling, storage, transport and end-of-life disposal. GIP will be followed, including general safety requirements specific to product safety standards and codes of practice in a given business sector and country.
33. The client will identify and continually evaluate health and safety risks to all consumers associated with its products throughout their lifecycle. The approach to product safety will adhere to the hierarchy of risk control and ensure that adequate information on the product's health and safety risks is provided to consumers. For situations involving products that may pose serious health or safety threats, the client will ensure that product recall and product withdrawal policies and procedures are in place.

### **Psychosocial risks**

34. The client will identify and assess potential psychosocial risks to project workers that may occur due to exposure to project-related activities and locations and, where appropriate, identify opportunities to prevent potential negative impacts on workers' mental health. The client will adopt appropriate measures to manage any negative mental health concerns raised by project workers and provide confidential mechanisms to report concerns. The client will implement methods to support and promote mental health and wellbeing to project workers through a workplace mental health awareness plan.

### **Health and safety risks in community services**

35. Where the project involves the provision of services to communities, the client will ensure the safety and quality of such services for all community members, taking into consideration the distinct needs of vulnerable people, and implement appropriate quality management systems to make sure that such services do not pose risks to project workers or community health and safety.
36. Where the project involves the provision of public services, to the extent possible, the client will incorporate the principles of universal design.<sup>52</sup>

51 Hazardous materials refer to substances that have one or more inherently harmful properties, such as chemical, biological and radiation, which can have a significant adverse effect on the environment or human health.

52 As defined in paragraph 29 of this ESR.

37. Where the project involves the provision of health services and/or the production, distribution and use of antimicrobials, the client will incorporate antimicrobial stewardship<sup>53</sup> to minimise antimicrobial resistance.

### Traffic and road safety

38. The client will identify, assess, manage and monitor traffic and road safety risks and health impacts on project workers and project-affected communities throughout the project lifecycle and, where appropriate, develop and implement measures and plans to address them. The client will pay particular attention to the risks created by the project to vulnerable road users, including children, cyclists, the elderly and people with disabilities, and the need to engage with these vulnerable users at the project planning phase.
39. The client will take into consideration relevant EU road and traffic safety management standards.<sup>54</sup> Where appropriate, the client will carry out a road safety impact assessment, road safety audits and road safety inspections at relevant stages of the project, identify road safety measures for both motorised and non-motorised road users and incorporate technically and economically feasible and cost-effective road safety components into the project design to mitigate potential road safety impacts on local affected communities. The client will routinely monitor incident and collision reports to identify and resolve problems or negative safety trends.
40. For projects with vehicles or fleets of vehicles (owned or leased), the client will introduce GIP arrangements to manage road and traffic risks<sup>55</sup> and will proactively prevent the risk of road traffic collisions. The client will ensure regular maintenance of all project vehicles, monitor driving standards and put appropriate systems and processes in place to identify and manage unsafe driving behaviour. Where vehicles or fleets include goods or passenger vehicles, the client will implement specific driver safety training programmes and introduce measures to monitor driving hours and proactively prevent driver fatigue, consistent with GIP. For all new vehicles to be used on the project, the client will include safety performance as a criterion for selection. For existing vehicles, a robust maintenance and inspection programme will be implemented to ensure continued roadworthiness, alongside any related plan for fleet retirement.
41. The client will ensure the safe and secure transport of hazardous materials, including wastes, and will implement measures to avoid or reduce project-affected community exposure.

### Natural and climate change hazards

42. The client will identify natural hazards and assess the potential risks caused by those hazards, such as earthquakes, droughts, landslides or floods as they relate to the project, as well as any associated risks to workers. This may require the client to undertake an assessment of the vulnerability of the project to risks caused by climate change and to identify OSH prevention and control strategies and appropriate climate resilience and adaptation measures to be integrated into the project design.
43. The client will avoid and/or minimise risks caused by natural hazards or land use changes to which project activities may contribute.

### Exposure to disease

44. To help prevent or minimise the potential for worker and project-affected community exposure to disease, taking into account differentiated exposure and the higher sensitivity of vulnerable people, the client will develop appropriate mitigation in consultation with the relevant authorities. The client will take measures to avoid or minimise the transmission and spread of communicable diseases that may be associated with the influx of temporary and/or permanent project workers and diseases influenced by other environmental factors.
45. Where specific diseases are endemic in project-affected communities, the client is encouraged to identify opportunities throughout the project life-cycle to improve conditions that could help reduce their incidence,

53 Antimicrobial stewardship is a coordinated programme, as defined by the World Health Organization, that promotes the appropriate use of antimicrobials (including antibiotics), improves patient outcomes, reduces microbial resistance and decreases the spread of infections caused by multidrug-resistant organisms.

54 Consistent with the objectives of [Directive 2008/96/EC of the European Parliament and of the Council of 19 November 2008 on road infrastructure safety management as amended by Directive \(EU\) 2019/1936](#).

55 In accordance with GIP, such as [ISO 39001 on road traffic safety management](#).

both among project workers and project-affected communities. The client will take measures to avoid or minimise the transmission of communicable diseases and prevent gender-based risks that may be associated with the influx of temporary and/or permanent project labour.

### Emergency preparedness and response

46. The client will be prepared to prevent, respond to and recover and learn from incidents, accidents and emergency situations in a manner appropriate to the operational risks associated with the project and the need to prevent or reduce their potential adverse impacts, in accordance with applicable regulatory requirements and GIP.<sup>56</sup>
47. The client will identify and assess major-accident hazards and take all necessary measures to prevent major accidents or limit such risks to workers, project-affected communities – including a particular focus on vulnerable persons – and the environment, with a view to ensuring high levels of protection for people and the environment in a consistent and effective manner. These measures will be identified in a major-accident prevention/emergency preparedness policy and an appropriate management plan, integrated into the client's overall ESMS. The plan will include organisational structures, responsibilities, procedures, communications, training, resources and other aspects required to implement such a policy to ensure that the client has the capacity to respond effectively to emergencies associated with project hazards in accordance with GIP.
48. For projects where major-accident hazards are present, the client will assist and cooperate with the relevant authorities and the project-affected community in their preparations to respond effectively to emergency situations. If local authorities or responders have little or no capacity to respond effectively, the client will play an active role in preparing for and responding to emergencies associated with the project, and will provide adequate evidence to demonstrate its capacity to respond to foreseeable incidents, either directly or indirectly.

### Security

49. The client will identify and assess project security threats to project workers and project-affected communities. Where risks have been identified, adequate security management arrangements and contingency plans to protect the integrity of project operations from security incidents or changes to the operating environment will be implemented in accordance with GIP. In the event of a serious deterioration in the operating environment due to elevated security or safety risks, the client will implement changes to project operations, as required, to ensure the safety of project workers and project-affected communities.
50. When the client retains or changes security services to safeguard its project workers and property, it will assess risks posed by these security arrangements to those within and outside the project site. The assessment will consider the risks of gender-based discrimination, violence and harassment, and child sexual abuse and exploitation, both in the workplace and in project-affected communities. In making such arrangements, the client will be guided by the principle of proportionality, GIP and applicable laws in terms of rules of conduct and in hiring, training, equipping and monitoring the conduct of such project workers. The client will not sanction any use of force except when used for preventative and defensive purposes in proportion to the nature and extent of the threat. The client will make clear that any retaliation against people by security contractors will not be tolerated. If the security services retained by the project change from private actors to actors under the responsibility of the relevant governmental authority, the client will report the change to project workers, the community, and the Bank. The client will prevent the use of security services to restrict the exercise of freedom of association or other protections under ESR 2 and ESR 4 and will not sanction the use of force to intervene in labour disputes, including work stoppages.
51. If security services are the responsibility of relevant governmental authorities, the client will collaborate, to the extent permitted, with the responsible government authority to achieve outcomes consistent with this ESR. The client will identify and assess potential risks arising from such use, communicate to the relevant public authorities its intent that security personnel act in a manner consistent with paragraph 48 above,

<sup>56</sup> As set out in Directive 2012/18/EU of the European Parliament and of the Council of 4 July 2012 on the control of major-accident hazards involving dangerous substances, amending and subsequently repealing Council Directive 96/82/EC (EU SEVESO III Directive).

and encourage the relevant public authorities to disclose the security arrangements for the client's facilities to the public, subject to overriding security concerns.

52. The client will (i) make reasonable inquiries to verify that the employees or contracted project workers retained by the client to provide security are not implicated in past abuses, including GBVH and child sexual abuse and exploitation; (ii) train them adequately (or determine that they are properly trained) in the use of force (and, where applicable, firearms) and in appropriate conduct towards project workers and project-affected communities; and (iii) require them to act within the applicable law and any requirements set out in ESR 2 and any other ESRs as specified by the client.
53. The client will establish and maintain an effective grievance mechanism to allow the affected community and project workers to express concerns about security arrangements and the actions of security personnel, including adequate provisions to respond to reports of GBVH and child sexual abuse and exploitation, and will inform communities and project workers of the availability and use of grievance mechanisms, in accordance with this ESR and ESR 10.
54. The client will investigate any allegations of unlawful or abusive acts by security personnel, take action (or urge appropriate parties to take action) to prevent recurrence and, where necessary, report unlawful and abusive acts to the public authorities and the EBRD.

## **Worker welfare and accommodation**

55. The client will identify and make available appropriate worker welfare and accommodation arrangements relevant to the work being undertaken and the hazards to which project workers are exposed throughout the project lifecycle. Project workers will have access to safe and hygienically clean facilities for different genders, in accordance with GIP, where they can rest, eat and wash. Worker welfare and accommodation arrangements will be well ventilated, offer protection from extreme temperatures and be appropriately maintained. Welfare and accommodation arrangements will also include free and unrestricted access to wholesome drinking water for all project workers.
56. Where a client provides sleeping accommodation for project workers and visitors, the client will put in place and implement policies governing the quality and management of the accommodation arrangements and provision of services. The welfare and accommodation services need to ensure structural safety and reasonable levels of decency, hygiene and comfort. The accommodation facilities will be well ventilated, have suitable and safe arrangements for temperature control and be appropriately maintained. The accommodation will be provided in accordance with GIP and in a manner consistent with the principles of non-discrimination and equal opportunity, including safeguards against sexual harassment and other forms of GBVH. Workers' freedom of movement to and from the employer-provided welfare and accommodation will not be unreasonably restricted.