

Baljuvon – Sari Khosor Road Project

Contract No. 2025.015035



Environmental and Social Action Plan, June 2026

| Version | Date | Prepared By | Reviewed By | Approved By |
|---------|---------------|-------------|--------------|-------------|
| 1.0 | 01 April 2026 | Various | A. Perkinson | N. Skinner |
| 2.0 | 08 April 2026 | Various | A. Perkinson | N. Skinner |
| 3.0 | 02 June 2026 | Various | A. Perkinson | N. Skinner |

Table of Contents

| | |
|---|---|
| TABLE OF CONTENTS | 2 |
| ACRONYMS AND ABBREVIATIONS | 3 |
| I. INTRODUCTION | 5 |
| 1.1. BACKGROUND | 5 |
| 1.2. PROJECT COMPONENTS | 5 |
| 1.3. PROJECT OBJECTIVES | 5 |
| 1.4. RATIONALE FOR THE ESAP | 5 |
| 2. ENVIRONMENTAL AND SOCIAL ACTION PLAN | 7 |

Acronyms and Abbreviations

| Acronym | Meaning |
|---------|---|
| ACM | Asbestos-Containing Materials |
| BBOP | Business and Biodiversity Offsets Programme |
| BMP | Biodiversity Management Plan |
| BSK | Baljuvon–Sari Khosor Road |
| CBD | Convention on Biological Diversity (UN) |
| CEDAW | Convention on the Elimination of All Forms of Discrimination Against Women |
| CEP | Committee for Environmental Protection (Tajikistan) |
| CESMP | Contractor’s Environmental and Social Management Plan |
| CITES | Convention on International Trade in Endangered Species of Wild Fauna and Flora |
| CLO | Community Liaison Officer |
| CRC | Convention on the Rights of the Child |
| CSC | Construction Supervision Consultant |
| DNP | Defects Notification Period |
| E&S | Environmental and Social |
| EBRD | European Bank for Reconstruction and Development |
| EHS | Environmental, Health and Safety |
| EIA | Environmental Impact Assessment |
| ERPP | Emergency Response and Preparedness Plan |
| ESAP | Environmental and Social Action Plan |
| ESHS | Environmental, Social, Health and Safety |
| ESIA | Environmental and Social Impact Assessment |
| ESMP | Environmental and Social Management Plan |
| ESMS | Environmental and Social Management System |
| ESP | Environmental and Social Policy (EBRD) |
| ESR | Environmental and Social Requirement (EBRD) |
| EU | European Union |
| GBVH | Gender-Based Violence and Harassment |
| GIIP | Good International Industry Practice |
| GRM | Grievance Redress Mechanism |
| HMMP | Hazardous Materials Management Plan |
| IFC | International Finance Corporation |
| IEE | Initial Environmental Examination |
| ILO | International Labour Organization |
| ISO | International Organization for Standardization |
| LARP | Land Acquisition and Resettlement Plan |
| LMP | Labour Management Procedures |
| MDB | Multilateral Development Bank |
| MoT | Ministry of Transport of the Republic of Tajikistan |
| MPE | Maximum Permissible Emissions |
| NCR | Non-Conformance Report |
| NGO | Non-Governmental Organization |
| NGP | Net Gain Plan |
| NTS | Non-Technical Summary |
| OHS | Occupational Health and Safety |
| PCM | Project Complaint Mechanism (EBRD) |
| PIURR | Project Implementation Unit for Roads Rehabilitation |
| PPE | Personal Protective Equipment |
| PR | Performance Requirement (EBRD) |
| PwD | Persons with Disabilities |
| RSA | Road Safety Audit |



| | |
|--------|--|
| SCLO | Senior Community Liaison Officer |
| SEA/SH | Sexual Exploitation and Abuse / Sexual Harassment |
| SEP | Stakeholder Engagement Plan |
| TMP | Traffic Management Plan |
| TOR | Terms of Reference |
| UNESCO | United Nations Educational, Scientific and Cultural Organization |
| WHO | World Health Organization |

I. Introduction

1.1. Background

The European Bank for Reconstruction and Development (EBRD) is considering providing financing to the Republic of Tajikistan for the upgrade of the Baljuvon–Sari Khosor (BSK) road section. The Project Implementation Unit for Roads Rehabilitation (PIURR) under the Government of Tajikistan will act as the implementing agency.

The Project involves upgrading approximately 56 km of an existing unpaved road to a two-lane Category V standard to enable year-round access, improve safety, and enhance connectivity between settlements and regional markets. The road is located in Baljuvon district of Khatlon Region, Republic of Tajikistan, generally following the Shurabdarya River valley through steep mountainous terrain characterised by natural hazards including landslides, mudflows, erosion, and seasonal flooding. The route is divided into two sections: Section 1 (km 0+000 to km 20+100) and Section 2 (km 20+100 to km 56+300), with the project endpoint near Kalanak village and the Sari Khosor waterfall area - an emerging tourism destination.

The Environmental and Social Action Plan (ESAP) forms part of the Project's overall environmental and social management framework and establishes the key actions required to ensure compliance with applicable EBRD Environmental and Social Requirements (ESRs), as further detailed in Section 3.

1.2. Project Components

Key components include rehabilitation of the existing alignment; construction of paved carriageway, shoulders, drainage structures, culverts, and bridges; slope stabilization and erosion protection in mountainous sections; installation of road safety features and signage; and establishment of temporary construction facilities such as camps, borrow areas, material stockpiles, and access roads. The Project also includes ancillary activities required for construction and operation, including traffic management, utility coordination, and environmental and social mitigation measures. These components will be implemented in a manner designed to maintain access for local communities and minimize disruption during construction.

1.3. Project Objectives

The Project's primary objective is to provide a safe, reliable, and year-round road connection between Baljuvon district and the Sari Khosor area, improving mobility for local communities and strengthening regional connectivity. The upgraded road is intended to enhance access to essential services such as healthcare, education, and markets; improve road safety and reduce travel times; support local economic development, including agriculture and tourism; and increase climate resilience of transport infrastructure in a mountainous and hazard-prone area. The Project also aims to align with national development priorities and international lender requirements by integrating environmental and social risk management, meaningful stakeholder engagement, and inclusive development principles throughout the project lifecycle.

1.4. Rationale for the ESAP

The Project is financed by the EBRD. The Project has been categorised as Category A under the EBRD Environmental and Social Policy (2024), reflecting significant potential environmental and social impacts in a mountainous, biodiversity-sensitive, and socially complex setting. Category A classification requires a full Environmental and Social Impact Assessment (ESIA) and meaningful stakeholder engagement throughout the project lifecycle.

The ESAP is a document outlining the specific actions necessary to implement the Project in line with the EBRD's ESP (2024) and applicable ESRs. This document will be an attachment to the legally binding



Loan Agreement between the EBRD and the Government of Tajikistan for the financing of the Project. Implementation of the ESAP will be monitored by the EBRD.

The PIURR will be responsible for implementing the ESAP and ensuring that all Contractors, subcontractors, and the Construction Supervision Consultant (CSC) comply with its requirements. Progress against the ESAP will be reported in semi-annual environmental and social monitoring reports submitted to the EBRD during construction and throughout the Defects Notification Period (DNP). This ESAP should be read in conjunction with the ESIA, Environmental and Social Management Plan (ESMP) and its annexes, SEP, LARP, and Labour Management Procedures (LMP).

The ESAP addresses the requirements of applicable EBRD Environmental and Social Requirements, in particular ESR1 (Assessment and Management of Risks and Impacts), ESR2 (Labour and Working Conditions), ESR3 (Resource Efficiency and Pollution Prevention), ESR4 (Health, Safety and Security), ESR5 (Land Acquisition and Resettlement), ESR6 (Biodiversity Conservation), ESR8 (Cultural Heritage), and ESR10 (Stakeholder Engagement).

The Lenders' Monitoring Agent (LMA) reviews CESMPs and ESAP implementation on behalf of the lenders and reports to EBRD.

2. Environmental and Social Action Plan

The ESAP presented in table 1 defines the key environmental and social actions required to ensure that the Project is implemented in compliance with the EBRD ESPs (2024) applicable ESRs, national legislation of the Republic of Tajikistan, and Good International Industry Practice (GIIP).

The ESAP translates the findings of the ESIA and the requirements of associated management plans (including the ESMP, SEP, LARP, and LMP) into a set of time-bound, measurable actions with clearly assigned responsibilities. These actions apply to the PIURR, Contractor(s), and the Construction Supervision Consultant (CSC), and will be monitored throughout the Project lifecycle. Progress against the ESAP will be reported to the EBRD through regular environmental and social monitoring reports and may be subject to independent verification.

.

Table 1: ESAP

| No. | Action | Environmental & Social Risks (Liability / Benefits) | Requirement (Legislative, EBRD ESR, Best Practice) | Resources, Investment Needs, Responsibility | Timetable | Target and Evaluation Criteria for Successful Implementation | Status |
|--|--|---|--|--|--|---|--------|
| ESR 1 - Assessment and Management of Environmental and Social Impacts and Issues | | | | | | | |
| 1.1 | Establish and operationalise a Project ESMS aligned with EBRD ESRs and GIIP (e.g. ISO 14001), including procedures, reporting, and document control | Compliance with EBRD ESRs. | Law on Environmental Protection (2011); Law on EIA (2018); Government Order No. 532 (2018); EBRD ESP (2024); EBRD ESR1; GIIP | PIURR (establish and maintain). Contractor (implement through CESMP). CSC (assist the PIURR in the development and implementation of the ESMS, verify compliance). LMA (review CESMPs and ESAP implementation on behalf of the lenders; report to EBRD). | Prior to mobilisation | ESMS documented and operational before site establishment and construction works commence. Signed roles and responsibilities matrix in place. | |
| 1.2 | <p>The MOT / PIURR will ensure that there are adequate resources and capacity provided at all times to ensure the management of EHSS risks of the project. The MOT will ensure as a minimum that the PIURR will appoint EHSS specialists familiar with the Banks PRs in respect to:</p> <ul style="list-style-type: none"> • Environmental Management • Health and Safety Management; • Social (including Resettlement and Labour Management) • Gender • Community Liaison and Stakeholder Engagement <p>Responsible personnel will communicate and monitor implementation of this ESAP requirements across all Project component</p> | <p>Minimise E&S impact of the Project.</p> <p>Ensure the EBRD E&S Policy requirements are efficiently implemented on the Project.</p> | EBRD ESR1 | PIURR | Appointment prior to project effectiveness. | <p>Job descriptions</p> <p>Monitoring reports</p> <p>Female Gender Specialist (if possible)</p> | |
| 1.3 | Contractor to appoint dedicated ESHS team before works commence per CESMP C-PC-05: (a) Environmental and Social Manager — full-time; (b) Health and Safety Specialist — full-time; (c) Ecologist; | Without qualified personnel in post, mitigation measures go unimplemented and non-compliances accumulate undetected. | EBRD ESR1; EBRD ESR4; GIIP | Contractor (appoint team; submit CVs to Engineer). CSC/Engineer (review CVs; issue written consent before mobilisation). PIURR (confirm | CVs consented to by Engineer before mobilisation; attendance register maintained throughout construction | CVs consented to by Engineer before mobilisation. CLO/SCLO contact details published in affected communities before works commence. Zero | |

| No. | Action | Environmental & Social Risks (Liability / Benefits) | Requirement (Legislative, EBRD ESR, Best Practice) | Resources, Investment Needs, Responsibility | Timetable | Target and Evaluation Criteria for Successful Implementation | Status |
|-----|--|--|---|---|--|--|--------|
| | (d) CLO/SCLO; (e) Environmental Specialist, responsible for waste management, pollution prevention and periodic monitoring of environmental indicators (noise, vibration and air quality) in accordance with national legislation. The Health and Safety Specialist shall be supported by full-time on-site Health and Safety Supervisors, with a minimum ratio of one supervisor per 50 workers. No key personnel substitution without prior review and written Engineer consent. Each subcontractor to appoint an on-site safety representative. | | | team in place before site access granted). | | unapproved key personnel substitutions. Ecologist presence confirmed before each vegetation-sensitive phase | |
| 1.4 | Develop and maintain a permit register covering all national approvals and licenses required for the Project, including CEP permits and Hukumat land-use permissions. No activity to commence without the applicable permit on file | Operating without required permits exposes PIURR and the Contractor to enforcement action by CEP or Hukumats, works suspension, and potential fines. Non-permitted discharges and extractions also create legal liability under Tajik environmental law. | Law on the Permit System (2023); Law on Environmental Protection (2011, No. 208); Water Code (2000); Government Order No. 532 (2018) — indicative permit list; CEP permitting requirements; EBRD ESR1; national licensing framework | PIURR. Contractor. CSC/Engineer (spot-check validity during site inspections). | Before construction commences; ongoing | Register established before mobilisation. Updated within 5 working days of any permit change. No site establishment or extraction without applicable permit on file. | |
| 1.5 | Complete pre-condition surveys before ground disturbance at each section. Pre-clearance ecological walkover by Ecologist resulting in a Pre-Clearance Certificate (CESMP Annex 8) required before any vegetation clearance. | Without baseline records, accidental damage cannot be distinguished from pre-existing conditions. Clearance before ecological walkover risks irreversible loss of Critical Habitat features. | Land Code (amended 2012) Art. 40–43; Government Decree No. 515 (2000); EBRD ESR1; ESR3; ESR5; ESR6; CESMP C-PC-03; GIIP | Contractor (conduct surveys; maintain records; obtain Pre-Clearance Certificates). CSC/Engineer (review survey records; verify certificates on file before clearance). PIURR (oversight). | Before any ground disturbance at each section; updated progressively as works advance along the corridor | Pre-condition photographic survey, noise/air baseline, and access road condition survey records on file. Pre-Clearance Certificate issued by Ecologist and on file before any vegetation clearance. Zero sections commenced without complete baseline records. | |
| 1.6 | Implement the ESMP for the Project. Contractor to develop, and CSC to review and approve, all required sub-plans as specified in Annexes 1-16 of the ESMP. Per ESMP, sub-plans must be submitted at | Minimise E&S impacts of Project activities; continuous improvement. | Law on Environmental Protection (2011); Law on EIA (2018); Government Order No. 532 (2018); SEE conclusion issued by CEP; EBRD ESP (2024); | PIURR to monitor. Contractor to develop. CSC to review and approve. | Sub-plans submitted at least 30 days prior to commencement of physical works; ongoing thereafter. | All sub-plans shall be submitted at least 30 days prior to commencement of physical work on site. Approval shall be obtained prior to implementation of | |

| No. | Action | Environmental & Social Risks (Liability / Benefits) | Requirement (Legislative, EBRD ESR, Best Practice) | Resources, Investment Needs, Responsibility | Timetable | Target and Evaluation Criteria for Successful Implementation | Status |
|-----|--|--|--|---|--|--|--------|
| | least 30 days prior to commencement of physical works on site. | | EBRD ESR1; IFC EHS General Guidelines (2007); GIIP | | | the relevant activity. Approval status log maintained and submitted with monthly ESHS report. | |
| 1.7 | Establish and implement NCR system for ESHS non-compliances | Failure to identify and correct ESHS non-compliances | Law on Environmental Protection (2011) — State control provisions; Code of Administrative Violations (2010); EBRD ESR1; GIIP | Contractor (operate NCR system). CSC/Engineer (issue NCRs; verify close-out). PIURR (oversight; escalation) | Prior to mobilisation, ongoing throughout construction | NCR register active before mobilisation. All ESHS non-compliances recorded within 24 hours of identification. Category 1 ¹ non-compliances notified to EBRD within 5 working days. NCR status summary included in Contractor's monthly ESHS report. | |
| 1.8 | Set-up, maintain and continually review an Environmental, Health, Safety and Social (EHSS) Incident Reporting Procedure (or equivalent) to maintain records of monitoring, accidents and incidents. This procedure is separate from, and not to be confused with, the NCR / non-conformance reporting system. The procedure must be fully integrated into the Project and for contractors located on site. | Management of EHSS accidents and incidents | EBRDESR1 and ESR4; GIIP | Contractor (operate NCR system). CSC/Engineer (issue NCRs; verify close-out). PIURR (oversight; escalation) LMA to review and follow up on serious incident/injury and/or work related accidents | Prior to mobilisation, ongoing throughout construction. Monitoring and review during construction (construction). | Root-cause analysis reports Monthly EHSS Reports submitted by the contractor to CSC. Report to EBRD semi-annually and annually in the Annual environmental and Social Report (AESR). including workhours, accident data (include contractor data separately and combined) | |
| 1.9 | Submit semi-annual E&S monitoring reports to EBRD during construction and throughout the Defects Notification Period (DNP), and annual reports during operation. Reports submitted within 45 days of period end. | Failure to submit timely, complete monitoring reports to EBRD is a Loan Agreement breach and can result in disbursement suspension. Missing GRM data obscures community impact trends. | Law on Environmental Monitoring (2011); Law on Environmental Information (2011); EBRD ESP (2024); EBRD ESR1 to ESR10; Loan Agreement reporting obligations | PIURR (submit reports). CSC (prepare reports and provide verification data and compliance assessment). Contractors (provide monitoring data) | Semi-annual during construction and DNP; annual during operation. | Reports submitted within 45 days of period end. ESAP progress table included in every report. | |

¹ Category 1 is defined as: any breach of an applicable EBRD ESR obligation; any breach of national environmental or social legislation; any fatality or serious injury to a worker or member of the public; any significant environmental pollution event (spill, discharge, or release reaching a watercourse); any SEA/SH incident; any chance find that has not been properly managed; or any instance of construction works commencing on land for which LARP compensation has not been confirmed

| No. | Action | Environmental & Social Risks (Liability / Benefits) | Requirement (Legislative, EBRD ESR, Best Practice) | Resources, Investment Needs, Responsibility | Timetable | Target and Evaluation Criteria for Successful Implementation | Status |
|--------------------------------------|--|---|--|--|---|---|--------|
| | Lenders Technical/Monitor Adviser to verify the information reported, and corrective actions plans agreed with PIURR, CSC and Contractors to address any non-conformances with the Banks ESRs. | | | | | | |
| 1.10 | Develop and implement a Design Change Management Procedure (DCMP) which includes the methodology for the assessment of, and where relevant, mitigation of environmental and social impacts of design changes. | E&S Risks | EBRD ESR 1 | Contractors to develop CSC to review and approve PIURR to approve | Prior mobilisation | Material design changes will be required to have an environmental and social assessment. Material design changes to be notified to the EBRD. | |
| ESR2 - Labour and Working Conditions | | | | | | | |
| 2.1 | Develop and adopt a Human Resources Policy, which shall cover as a minimum: <ul style="list-style-type: none"> Wages and other remuneration, including accommodation, paid leave and overtime Prevention of child and forced labour, including in the supply chain Equal opportunities Grievance mechanism Worker representation Disciplinary procedures A gender-sensitive Code of Conduct (CoC) that enshrines the commitment of the project to meet employment, labour, gender and inclusion standards Measures to prohibit all forms of sexual abuse, exploitation and harassment. | Manage labour risks; comply with national and international labour standards. | Labour Code (2016) — minimum age, working hours, forced labour prohibition, OHS; Law on State Guarantees of Equal Rights for Men and Women (2005); Law on Prevention of Domestic Violence (2013); ILO Conventions ratified by Tajikistan, IFC/EBRD Workers' Accommodation Guidelines (2009); EBRD ESR2 | Contractor (develop HR Policy and Labour & Working Conditions Management Plan; implement across all subcontractors; submit CESMP-09 for CSC approval). CSC (verify implementation). PIURR (oversight). | Prior to commencing construction at any site. | HR Policy submitted to EBRD and approved before construction. All workers briefed at induction; signed acknowledgement records maintained. | |

| No. | Action | Environmental & Social Risks (Liability / Benefits) | Requirement (Legislative, EBRD ESR, Best Practice) | Resources, Investment Needs, Responsibility | Timetable | Target and Evaluation Criteria for Successful Implementation | Status |
|-----|--|--|---|--|--|---|--------|
| | <p>Training to be provided to all workers on these requirements as a minimum during site induction.</p> <p>Apply across all contractors and subcontractors.</p> | | | | | | |
| 2.2 | <p>Ensure all accommodation provided to project workers is designed, constructed, and maintained in line with EBRD and IFC Guidelines for Workers' Accommodation (2009) and national sanitary norms. Inspection reports from CSC to be included in progress reports.</p> <p>Accommodation Management Plan to be submitted for CSC approval and EBRD "no objection" prior to occupancy.</p> | Management of working conditions and accommodation risks. | Labour Code (2016); Health Code (Law No. 1413, 2017); SanPIN sanitary norms for worker facilities; IFC/EBRD Workers' Accommodation Guidelines (2009); EBRD ESR2; GIIP | Contractor (design, construct, and maintain accommodation). PIURR (oversight). CSC (conduct inspections; include inspection reports in progress reports). | Before occupancy (CSC clearance required); monthly inspections throughout construction | CSC pre-occupancy inspection and written clearance before workers move in. Monthly CSC inspection reports included in progress reports. | |
| 2.3 | <p>Contractor to develop a Contractor Labour Management Plan (C-LMP) / Labour & Working Conditions Management Plan consistent with the Project LMP, implement it across all contractors and subcontractors, and cascade labour standards down the full contractor chain. The C-LMP shall be submitted to the Engineer, PIURR and EBRD for "no objection" prior to mobilisation.</p> | Without LMP implementation across the full contractor chain, labour standards are not cascaded to subcontractors — the highest-risk tier for wage, working hours, and child labour violations. | Labour Code (2016); ILO Labour Inspection Convention (ratified 2009); ILO Conventions ratified by Tajikistan; EBRD ESR2; GIIP | Project LMP already prepared (part of the ESMP package). Contractor — develops the C-LMP (via the Labour Officer) and implements it across all subcontractors. Engineer/CSC — reviews and approves the C-LMP; verifies compliance monthly during supervision. Independent third-party auditor — conducts annual labour audits against the C-LMP, Project LMP and EBRD ESR2, reporting findings to the Engineer and PIURR. PIURR — oversight and overall ESR2 accountability. | C-LMP approved prior to mobilisation; implementation ongoing throughout construction | C-LMP approved and implemented before mobilisation and flowed down to all subcontractors. Zero subcontractors found operating outside LMP requirements at any CSC inspection. | |
| 2.4 | <p>Contractors to develop, implement and communicate a formal grievance mechanism for all workers (including subcontractors and suppliers) involved in</p> | Suppressed complaints prevent timely corrective action and create legal and reputational liability. | Law on Appeals of Individuals and Legal Entities (2016, No. 1339) — Art. 14 (15-day and 30-day response timeframes); Labour Code (2016); Aarhus | Contractor (establish and operate). PIURR (oversight; receive summary reports). CSC (verify GRM is operational during site inspections) | Prior to mobilisation | All worker grievances acknowledged within 24 hours; resolved within 10 working days. Worker GRM log reported to Engineer quarterly. | |

| No. | Action | Environmental & Social Risks (Liability / Benefits) | Requirement (Legislative, EBRD ESR, Best Practice) | Resources, Investment Needs, Responsibility | Timetable | Target and Evaluation Criteria for Successful Implementation | Status |
|-----|--|--|--|--|--|--|--------|
| | the Project, including means of making complaints and suggestions anonymously. Ensure suggestion / grievance boxes are available at work sites and provide printed out blank forms next to the boxes to facilitate and encourage communication. Assign personnel in place to receive and process grievances. This is separate from community GRM. | | Convention (joined 2001); EBRD ESR2; ESR10 | | | | |
| 2.5 | PIURR to establish its own GRM for the project to receive and manage complaints from workers of all project parties which are not addressed or managed by contractors. | Suppressed complaints prevent timely corrective action and create legal and reputational liability. | Law on Appeals of Individuals and Legal Entities (2016, No. 1339) — Art. 14 (15-day and 30-day response timeframes); Labour Code (2016); Aarhus Convention (joined 2001); EBRD ESR2; ESR10 | PIURR with support from CSC | Prior contractor to mobilisation | All worker grievances acknowledged within 24 hours; resolved within 10 working days. Worker GRM log reported to Engineer quarterly. | |
| 2.6 | Ensure all workers have written contracts, legal wages, and no cash payments | Both prevent auditable verification of wage compliance and create forced labour indicators under EBRD ESR2 and Tajik law. | Labour Code (2016) — contract requirements, minimum wage, overtime, payment obligations; ILO Conventions ratified by Tajikistan; EBRD ESR2 | Contractor (ensure and implement). CSC (verify payroll records during inspections and annual labour audits). PIURR (oversight) | From mobilisation; ongoing throughout construction | 100% of workers holding signed written contracts, verified by CSC during site inspections. Zero workers paid cash without documented exemption. Payroll records available for inspection at any time. | |
| 2.7 | Prohibit child labour and forced labour; conduct periodic checks | Rural communities along the corridor have documented child labour in agriculture. Construction demand creates risk of under-18 engagement in haulage and camp roles. Child or forced labour triggers mandatory suspension of Bank disbursements. | Labour Code (2016) — minimum employment age 15 (Art. on child labour); Convention on the Rights of the Child (CRC) (1993); ILO Conventions ratified by Tajikistan; EBRD ESR2 | Contractor, PIURR, CSC (verify during inspections and annual labour audits) | From mobilisation; quarterly checks minimum; ongoing | Zero workers under 18 found across all contractors and subcontractors at any payroll audit. Zero instances of document retention or recruitment fees. CSC spot checks minimum quarterly with formal report following annual labour audits. | |
| 2.8 | Implement SEA/SH prevention measures and Code of Conduct | A male workforce in a remote setting adjacent to small rural | Law on Prevention of Domestic Violence (2013); Law on State | Contractor (develop CoC; deliver training; implement | Prior to mobilisation | Signed Code of Conduct on file for 100% of workers before | |

| No. | Action | Environmental & Social Risks (Liability / Benefits) | Requirement (Legislative, EBRD ESR, Best Practice) | Resources, Investment Needs, Responsibility | Timetable | Target and Evaluation Criteria for Successful Implementation | Status |
|------|---|---|---|---|---|--|--------|
| | | communities creates elevated SEA/SH and GBVH risk. | Guarantees of Equal Rights for Men and Women (2005); CEDAW (1979) and Optional Protocol; ILO Discrimination Convention (C111); Labour Code (2016); EBRD ESR2; EBRD ESP (2024) GBVH requirements | SEA/SH prevention measures). CSC (verify signed CoC and training records). PIURR (report incidents to EBRD; oversight) | | commencing work. SEA/SH training at induction and six-monthly refreshers; records maintained. Confidential reporting channel operational before mobilisation. Zero unresolved SEA/SH reports at any point. | |
| 2.9 | Report serious labour incidents: fatalities, SEA/SH, and GBVH — CSC & PIURR verbal notification within 1 hour, written report within 24 hours, full investigation within 5 working days; strikes — PIURR within 24 hours, EBRD within 48 hours; serious injuries — PIURR within 24 hours. All incidents logged and included in semi-annual E&S reports. | Failure to report fatalities, SEA/SH, or GBVH promptly to EBRD breaches the Loan Agreement, prevents timely remedial action, and exposes PIURR and the Government to legal liability. | Labour Code (2016) — accident investigation and reporting obligations; Law on Industrial Safety of Hazardous Production Facilities (2004); ILO Occupational Safety and Health Convention (C155); EBRD ESR2; EBRD ESP (2024) — mandatory 48-hour incident notification to Bank | Contractor, PIURR, CSC (immediately inform the Client and initiate investigation; provide detailed information on any fatality and work-related hospitalisation to lenders within 3 working days, in coordination with the Client). | Ongoing | Immediate notification to CSC/Engineer. Preliminary written reports to EBRD within 24 hours of fatalities, SEA/SH, or GBVH. Full investigation reports within 5 working days. Incident register current at all times. | |
| 2.10 | Ensure that the requirements for management of environmental, health, safety, social and labour standards / HR policies are adequately incorporated in tenders and works contracts for the Project components. | Contractor E&S management | EBRD ESR1, ESR2, ESR4, GIIP | PIURR | Prior to appointment of contractors | Contractor clauses setting out requirements for performance with respect to environmental, H&S, labour and HR policies of the Project are developed and included in the tender documentation and contracts. Record of inspections on contractors. | |
| 2.11 | Conduct annual labour audit covering all contractors and subcontractors. | Audit is the primary assurance mechanism for child labour, forced labour, GBVH, and wage compliance across the full contractor chain. | Labour Code (2016); ILO Labour Inspection Convention (ratified 2009); ILO C029, C138, C182; EBRD ESR2; GIIP | CSC. Contractor (provide access and documentation to auditor). | Annually; first audit no later than 12 months after physical works commence | Annual audit report submitted within 30 days of completion. Corrective action plan for all material findings within 30 days of report. | |
| 2.12 | Develop, implement and communicate a Gender Action Plan (GAP) with technical support from the Lender Monitor Adviser, | Provide equal opportunities for men and women and ensure economic inclusion in line with | EBRD ESR2 | PIURR (with external consultants EBRD) | Prior to and during construction. | Written Gender Action Plan (GAP), implemented, | |

| No. | Action | Environmental & Social Risks (Liability / Benefits) | Requirement (Legislative, EBRD ESR, Best Practice) | Resources, Investment Needs, Responsibility | Timetable | Target and Evaluation Criteria for Successful Implementation | Status |
|--|--|---|--|--|----------------------|---|--------|
| | <p>with the objective to build a safe and inclusive work environment across project construction and operation GAP to include processes and commitments on:</p> <ul style="list-style-type: none"> Prevention of gender-based violence, especially surrounding potential mobility and transport access points Measures for women's employment across roles Adequate, safe and inclusive working conditions, Gender-responsive communications and outreach Gender monitoring, including sex-disaggregated data collection <p>Inclusion of the requirement for contractors to submit a contractor-level GAP, showing how contractors will reach out, recruit and retain women.</p> <p>Implement arrangements to maximise the employment of the local population (as far as possible and including training as required), taking into account the commitments within the Gender Action Plan (GAP).</p> | <p>EBRD and ADB requirements and Tajik law.</p> <p>Mitigate social risks linked to gender-based violence and community impacts in the Project's area.</p> | <p>Law, 2005, No. 89, on 'equal opportunities and their realisation</p> <p>Labour Code of the Republic of Tajikistan</p> <p>GIIP</p> | Contractor/s | Ongoing. | <p>communicated. Included in tender documents</p> <p>Specific recruitment campaign for local women developed and implemented; women-specific recruitment sessions held.</p> <p>Information sessions on GBV and GAP with contractors and workers held.</p> <p>Regular reporting on GAP progress to MoT and Lenders</p> | |
| ESR 3 - Resource Efficiency and Pollution Prevention and Control | | | | | | | |
| 3.1 | Construct all design-embedded mitigation measures from the ESIA/ESMP design phase to specification, with no substitution, reduction or omission without the Engineer's written approval — in particular: (i) climate-resilient drainage and erosion/sediment control; (ii) seismic and slope-stability design for bridges, | All ESIA-identified environmental and social issues addressed by design and implementation. | EBRD ESR1; ESR3; IFC EHS General Guidelines (2007); GIIP | Contractor; verified by CSC. | During construction. | All design-embedded mitigation measures constructed to specification and confirmed in writing by CSC before section completion. No substitution or omission | |

| No. | Action | Environmental & Social Risks (Liability / Benefits) | Requirement (Legislative, EBRD ESR, Best Practice) | Resources, Investment Needs, Responsibility | Timetable | Target and Evaluation Criteria for Successful Implementation | Status |
|-----|---|--|--|--|--|---|--------|
| | retaining structures and cut slopes; (iii) specified road safety infrastructure; (iv) avoidance-led design around confirmed Critical Habitat (wild pear) clusters; and (v) preservation of riverbank irrigation access at confirmed abstraction points. | | | | | without written Engineer approval. | |
| 3.2 | Implement waste, hazardous materials, and spoil management plans | Significant pollution risk. Inadequate spoil disposal and uncontrolled hazardous waste handling | Law on Production and Consumption Waste (2002); Law on Soil Protection (2009); Law on Industrial Safety of Hazardous Production Facilities (2004); Basel Convention on Hazardous Wastes (ratified 2016); Stockholm Convention on Persistent Organic Pollutants; EBRD ESR3; ESMP Annexes 5, 6, 17, 18 | Contractor (implement). CSC (verify compliance with plans). PIURR (oversight) | Plans approved before construction commences; implementation throughout construction | Waste, Hazardous Materials, and Spoil Management Plans in approved status before construction. Zero unsegregated waste, uncontained hazardous materials, or unapproved disposal locations at any CSC inspection. Licensed disposal manifests submitted monthly. | |
| 3.3 | Obtain Special Water Use Permit and Discharge Permit before abstraction or discharge commences. Implement water quality and sediment control measures per CESMP C-07. Monitor water quality at agreed locations throughout construction. | Abstraction without permits and uncontrolled construction site discharges pose direct risk to the Shurabdarya River. | Water Code (2000); SanPiN 2.1.5.980-00; Special Water Use Permit (CEP); Discharge Permit (CEP); EBRD ESR3; IFC EHS General Guidelines (2007) | Contractor (implement; obtain Water Use and Discharge Permits). CSC (verify monitoring results and permit compliance). PIURR (oversight; notify EBRD of exceedances) | Permits obtained before abstraction or discharge commences; monitoring throughout construction | Permits obtained before abstraction or discharge. Monitoring results within SanPiN and IFC EHS limits. | |
| 3.4 | Obtain MPE permit before asphalt plant operation. Implement dust suppression, emissions controls, and speed limits per CESMP C-13. Monitor air quality at sensitive receptors throughout construction. | Management of air quality and dust nuisance to communities and workers. | Law on Protection of Atmospheric Air (2012); Government Resolution No. 464 (2006) — Tajik MACs; MPE permit (CEP); IFC EHS General Guidelines (2007); EBRD ESR3 | Contractor (implement; obtain MPE permit from CEP). CSC (verify monitoring results against IFC and national standards). PIURR (oversight) | MPE permit before asphalt plant operation; monitoring throughout construction | MPE permit obtained before asphalt plant operation. Monitoring results within IFC Tajik values. Results in monthly ESHS report. Community dust complaints responded to within 5 working days. | |
| 3.5 | Develop and implement a Noise and Vibration Management Plan (see Annex 14 of ESMP for Framework) | Management of noise and vibration nuisance to communities and damage to structures in a mountain setting with rock blasting. | SanPiN noise standards; Law on Protection of Atmospheric Air (2012); WHO Environmental Noise Guidelines for the European Region (2018); IFC EHS General Guidelines (2007); EBRD | Contractor (develop and implement). CSC (review and approve plan; verify monitoring results). PIURR (oversight) | Prior to construction. | Plan approved by CSC and PIURR before works at any sensitive receptor location. Noise monitoring results. Blasting notification to | |

| No. | Action | Environmental & Social Risks (Liability / Benefits) | Requirement (Legislative, EBRD ESR, Best Practice) | Resources, Investment Needs, Responsibility | Timetable | Target and Evaluation Criteria for Successful Implementation | Status |
|------------------------------------|--|--|---|---|------------------------|---|--------|
| | | | ESR3; national legislation on blasting and vibration | | | communities minimum 24 hours in advance. | |
| 3.6 | Develop and implement an Erosion and Sediment Control Plan for all earthworks and disturbed areas. | Management of erosion, sedimentation, and riverine habitat risks at scale. | Law on Soil Protection (2009); Water Code (2000); Law on Environmental Protection (2011); Law on Environmental Monitoring (2011); EBRD ESR3; IFC EHS General Guidelines (2007); GIIP | Contractor (develop and implement). CSC (review and approve plan; conduct site inspections). PIURR (oversight) | Prior to construction. | Plan approved before earthworks commence. All erosion controls installed before earthworks begin at each section and inspected weekly. Topsoil stockpiles protected. Zero visible uncontrolled sediment discharge to watercourses at any CSC inspection. | |
| 3.7 | Ensure environmentally compliant siting and operation of camps, borrow pits, asphalt plants and other ancillary facilities. Screen and assess each proposed site before establishment using the Biodiversity Screening Form and pre- clearance survey procedure (BMP Annex 8 / C-BIO-01) and the CESMP siting criteria for ancillary facilities, and manage each facility under its specific plan: Camp Management Plan (Annex 10), Borrow Areas & Quarries / Restoration (C-SG-05, Annexes 6 and 15), and asphalt plant & crusher site-selection plan (C-AQ-03, Annex 7). | Possibility of significant incidents — hydrocarbon contamination of river, community dust and odour complaints, and biodiversity impacts. Asphalt plant emissions without controls can exceed IFC EHS limits and trigger regulatory non-compliance. | Law on Environmental Protection (2011); Law on Protection of Atmospheric Air (2012); Law on Industrial Safety of Hazardous Production Facilities (2004); Atmospheric Emissions Permit (MPE) (CEP); Special Water Use Permit (CEP); Land use permissions from local Hukumats; EBRD ESR3; IFC EHS General Guidelines (2007); GIIP | Contractor (propose sites; obtain all required permits from CEP and Hukumats). CSC (review and approve site proposals before establishment). PIURR (final approval authority) | Prior to use | All required permits obtained and on file before any facility commences operation. Written PIURR site approval issued before establishment of each facility. Facilities decommissioned and reinstated on cessation of use, confirmed by CSC sign-off inspection. | |
| ESR4 - Health, Safety and Security | | | | | | | |
| 4.1 | Develop and implement OHS Management Plan per CESMP C-01, including risk assessments, site inductions, and toolbox talks. OHS induction mandatory for all workers and visitors before site access. The over-arching occupational health and safety plan, to cover as a minimum: • Roles and responsibilities | Minimise accidents; ensure safety of workers in a high-hazard mountain construction environment. | Labour Code (2016); Law on Industrial Safety (2004); Law on Fire Safety (1994); Health Code (2017); ISO 45001; EBRD ESR4; IFC EHS General Guidelines (2007) | PIURR to approve the plan and ensure oversight; Contractor develop and implement; CSC to review, approve and enforce implementation. | Prior to construction | Plan approved before construction. Fatal Accident Rate = 0. Total Recordable Incident Rate reported monthly. 100% of workers inducted before site access. | |

| No. | Action | Environmental & Social Risks (Liability / Benefits) | Requirement (Legislative, EBRD ESR, Best Practice) | Resources, Investment Needs, Responsibility | Timetable | Target and Evaluation Criteria for Successful Implementation | Status |
|-----|---|---|--|---|--|--|--------|
| | <ul style="list-style-type: none"> Job and task specific hazard analysis, risk assessment and control; PPE requirements and enforcement mechanisms Safety training for all personnel in their own language(s); Oversight of contractor OHS development / implementation, including mandatory reporting to PIURR; Record-keeping, including total work-hours, lost work-hours due to accidents/incidents, description of lost-time incidents, hospitalisations, fatalities; and Internal and external monitoring, checks, audits and inspections Principles for emergency response and evacuation <p>The same integrated document must be applied to all parties involved in the construction and operation of the Project.</p> | | | | | | |
| 4.2 | Provide PPE with no cost to any workers and enforce usage | Worker injury due to inadequate PPE use | Labour Code (2016) — employer obligation to provide PPE; Norms and Rules on Occupational Safety; Law on Industrial Safety (2004); EBRD ESR4; IFC EHS General Guidelines (2007); GIIP | PIURR to oversee; Contractor to implement and enforce usage; CSC to inspect/monitor and enforce. | Ongoing | 100% PPE compliance at all times in the work zone, verified by unannounced CSC inspections. Any non-compliance triggers immediate stop-work for affected task. PPE compliance rate in monthly ESHS report. | |
| 4.3 | Develop and implement a Traffic Management Plan (TMP) (see Annex 3 of ESMP for Framework) | Unmanaged construction traffic near settlements poses road safety risks to pedestrians, children, and livestock. Loss of access to farm tracks or irrigation channels during the agricultural | National road safety requirements; SNiP road design standards; Law on Protection of Population from Emergency Situations (2004); EBRD ESR4; | Contractor (develop TMP; implement at all active work fronts; notify communities of restrictions). CSC/Engineer (approve TMP; verify weekly compliance; confirm | TMP approved before any road-affecting works commence; ongoing throughout construction | TMP approved before any road-affecting works. Continuous vehicular access maintained at all times. Any unavoidable closure communicated at least 48 | |

| No. | Action | Environmental & Social Risks (Liability / Benefits) | Requirement (Legislative, EBRD ESR, Best Practice) | Resources, Investment Needs, Responsibility | Timetable | Target and Evaluation Criteria for Successful Implementation | Status |
|-----|---|--|---|--|------------------------------------|---|--------|
| | | season causes direct livelihood impacts. | ESR5; IFC EHS General Guidelines (2007); GIIP | emergency access arrangements). PIURR (oversight; to be notified of any unplanned closure immediately) | | hours in advance. Farm track, irrigation channel, and pedestrian access maintained or equivalent alternative confirmed with affected communities before works in each section commence. | |
| 4.4 | <p>Establish Emergency Response Plan and coordinate with local services.</p> <p>This should include:</p> <ul style="list-style-type: none"> • Roles and responsibilities • Procedures for responding to different scenarios (fire, flood, traffic accident, etc.) • Resources required (personnel and equipment) and how these will be provided and maintained • Competence and training requirements <p>This must consider delays to emergency response services, due to the current condition of the road and climatic factors that can disrupt access.</p> <p>Continually review and update, as a minimum annually and after any emergencies or accidents.</p> | Preparation for emergency situations in a remote mountain setting with limited external response capacity. | Law on Protection of Population and Territories from Emergency Situations of Natural and Man-Made Character (2004); Law on Fire Safety (1994, No. 995); Law on Industrial Safety (2004); EBRD ESR3; ESR4; GIIP; IFC EHS General Guidelines (2007) | Contractor (preparation); PIURR and CSC (review and approval). | Prior to construction | Approved ERPP in place at construction start. | |
| 4.5 | <p>Develop and implement emergency preparedness and response plans for the operational phase of the road. This should include:</p> <ul style="list-style-type: none"> • Roles and responsibilities • Procedures for responding to different scenarios (fire, flood, traffic accident, etc.) | Preparation for emergency situations and potential accidents are managed. | EU EIA Directive, EBRD ESR3 and ESR4; and GIIP | PIURR with CSC support | Prior to commencement of operation | <p>Emergency Preparedness and Response Plans.</p> <p>This must consider delays to emergency response services, due to the current condition of the road.</p> | |

| No. | Action | Environmental & Social Risks (Liability / Benefits) | Requirement (Legislative, EBRD ESR, Best Practice) | Resources, Investment Needs, Responsibility | Timetable | Target and Evaluation Criteria for Successful Implementation | Status |
|-----|--|--|---|---|--|---|--------|
| | <ul style="list-style-type: none"> Resources required (personnel and equipment) and how these will be provided and maintained Competence and training requirements <p>Continually review and update, as a minimum annually and after any emergencies or accidents.</p> | | | | | | |
| 4.6 | <p>Develop and implement an inspection and maintenance programme (I&MP) for the road, bridges, tunnels and all safety features during the operational phase. This programme should be in line with the most appropriate Tajik and/or international standards for inspection and maintenance of each type of infrastructure. The I&MP shall also include detailed H&S Management Plan (HSMP) for operational and maintenance teams working on the road during the operational phase, including as a minimum:</p> <ul style="list-style-type: none"> Specific risk assessments of activities (inclusive of all EHSS topics); Specific procedures and operational controls to minimise risks and impacts; Training and competence of personnel Emergency planning Welfare provisions (water, sanitation, etc.) Incident reporting and investigation Safety equipment Traffic controls | Improved health and safety performance | EBRDES4, and GIIP | PIURR (and maintenance contractors if used) with support from CSC | <p>Program developed prior to operation of road</p> <p>Implementation throughout operational phase</p> | <p>Program developed</p> <p>Resources allocated</p> <p>Inspection and maintenance records</p> | |

| No. | Action | Environmental & Social Risks (Liability / Benefits) | Requirement (Legislative, EBRD ESR, Best Practice) | Resources, Investment Needs, Responsibility | Timetable | Target and Evaluation Criteria for Successful Implementation | Status |
|---|---|---|--|---|--|---|--------|
| | Community health and safety Any deficiencies identified should be rectified in good time to prevent deterioration of the infrastructure. Sufficient resource should be made available to ensure that programs can be implemented to the required standards. | | | | | | |
| 4.7 | Develop and implement a Hazardous Materials Management Plan (ESMP Annexes 5 & 6). PIURR, CSC, and all Contractor ESHS staff to complete the EBRD eLearning Asbestos Awareness course. | All hazardous material E&S issues appropriately addressed. | Law on Industrial Safety of Hazardous Production Facilities (2004); Law on Production and Consumption Waste (2002, amended 2011); Law on the Permit System (2023) — hazardous waste handling licence; Basel Convention on Hazardous Wastes (ratified 2016); EU Directive 2009/148/EC; ISO 14001; ISO 45001; EBRD ESR3; ESR4; EBRD eLearning Asbestos Awareness requirement | Contractor (develop HMMP; engage licensed ACM subcontractors; complete EBRD eLearning). PIURR and CSC (approve HMMP; verify eLearning certificates; submit certificates to EBRD) | Prior to and during construction. | HMMP approved before construction. eLearning completion certificates submitted to EBRD within 30 days of contract award. ACM screening completed before any structure demolition. Licensed disposal manifests on file for all ACM removed. | |
| 4.8 | Before road opening, prepare a Road Safety Audit (RSA); submit corrective action plan to EBRD within 30 days of the RSA report. During operation, conduct annual noise monitoring at baseline settlement stations during the first three years of operation and every three years thereafter. | Road safety risks to pedestrians and livestock increase with higher speeds and volumes on an upgraded road. Operational noise is projected to exceed 55 dB(A) around Year 12; without monitoring, exceedance goes undetected. | EBRD ESR4; SanPiN noise standards (55 dB(A) daytime residential limit); IFC EHS General Guidelines (2007) — Road Safety; GIIP | PIURR (implement operational noise monitoring programme; designate speed limit if trigger exceeded). CSC (facilitate RSA; verify corrective actions are implemented before road opening) | RSA completed before road opens to public traffic; corrective actions submitted to EBRD within 30 days of RSA report; noise monitoring annually for first three years of operation, then every three years | RSA report submitted to EBRD before road opening. Corrective action plan for all RSA findings submitted within 30 days. Annual noise monitoring results reported in annual Environmental Monitoring Report. 30 km/h speed limit with physical traffic calming implemented within six months if 55 dB(A) daytime L _{Aeq} recorded at any settlement receptor. | |
| ESR5 - Land Acquisition, Involuntary Resettlement and Economic Displacement | | | | | | | |

| No. | Action | Environmental & Social Risks (Liability / Benefits) | Requirement (Legislative, EBRD ESR, Best Practice) | Resources, Investment Needs, Responsibility | Timetable | Target and Evaluation Criteria for Successful Implementation | Status |
|---|--|--|--|--|--|--|--------|
| 5.1 | Implement the Project Land Acquisition and Resettlement Plan (LARP) and Livelihood Restoration Plan, including compensation prior to land access. No works to commence on any parcel until PIURR confirms in writing that compensation for that parcel has been paid in full and the affected party notified. Confirmation of LARP delivery to be carried out via Completion Report submitted to EBRD for No Objection. Site handover can be sectional based on Sectional LARP Completion Report. | Failure to compensate affected persons before works commence is a breach of Tajik law and EBRD ESR5, and creates legal exposure for PIURR | Constitution of the Republic of Tajikistan (1994) Art. 12-13; Land Code (amended August 2012, No. 891) Art. 40-43 — compensation and notification requirements; Civil Code Art. 265 — market value assessment; Government Decree No. 515 (2000) — compensation of losses to land users; Law on Land Reform (1992); Law on Land Valuation (2001); Law on Dehkan Farms (2002, No. 48); EBRD ESR5; GIIP | PIURR and CSC. CSC to prepare LARP Completion Report subject to EBRD 'no objection' before site access is provided. | Before construction commences on any parcel; ongoing throughout construction | LARP implementation to be verified via Completion Report to be No Objected by EBRD and Client prior to handover of the affected sections to the Contractor. | |
| 5.2 | Maintain land access and damage register Contractor to maintain a land access log recording written PIURR confirmation for each section. | Without a land access log, there is no auditable record that compensation preceded works, leaving PIURR and the Contractor vulnerable to retrospective compensation claims. | Land Code (amended 2012) Art. 40 — one-year prior notification requirement; Law on Land Management (2008, amended 2016); EBRD ESR5; GIIP | Contractor (maintain land access log). CSC (verify written PIURR confirmation is on file for each section before works commence). PIURR (issue written confirmations; oversight) | Log established before construction commences; maintained throughout construction | Land access log on site with PIURR written confirmation for every parcel. Zero parcels worked without confirmation on file. Log reviewed by Engineer monthly and submitted as part of monthly ESHS report. | |
| 5.3 | Monitor livelihood restoration and vulnerable groups | Livelihood impacts in subsistence agricultural communities can persist beyond construction. Vulnerable households face the highest risk of long-term impoverishment without active monitoring. | Land Code (amended 2012); Law on Dehkan Farms (2002); Law on Pastures (2013); Law on State Guarantees of Equal Rights for Men and Women (2005); EBRD ESR5; GIIP | PIURR | During construction; ongoing post-construction until livelihood restoration targets confirmed as met | Livelihood restoration monitoring reports submitted semi-annually. LARP livelihood restoration targets confirmed as met before project completion. Results reported in semi-annual E&S monitoring reports. | |
| ESR6 - Biodiversity and Living Natural Resources | | | | | | | |
| 6.1 | Develop and implement a site-specific Biodiversity Management Plan (BMP) per CESMP C-08 based on ESIA biodiversity baseline and the Critical Habitat Assessment (CHA, May 2026). The BMP shall reflect the CHA Critical Habitat | Avoidance, minimisation, and compensation of ecological impacts; no net loss of Priority Biodiversity Features. | Law on Fauna (2008); Law on Specially Protected Natural Territories (2011); UN CBD (1997); Bonn Convention (2001); CITES (2016); EBRD ESR6 | PIURR; CSC; Contractor. | Pre-construction and during construction. | BMP and BMEP approved 3 months before any vegetation clearance or earthworks. BMP compliance confirmed in semi-annual E&S monitoring reports. | |

| No. | Action | Environmental & Social Risks (Liability / Benefits) | Requirement (Legislative, EBRD ESR, Best Practice) | Resources, Investment Needs, Responsibility | Timetable | Target and Evaluation Criteria for Successful Implementation | Status |
|-----|---|---|--|---|---|--|--------|
| | <p>determinations for <i>Pyrus tadshikistanica</i> and <i>Pyrus korshinskyi</i>, the updated Priority Biodiversity Feature list, and the Sensitive Feature Register (BAP Annex C), and be re-issued for Engineer and PIURR approval before any vegetation clearance, ground disturbance or earthworks. Contractor to adapt camp locations, work schedules, and access routes to BMP requirements. Deploy qualified Ecologist for pre-construction surveys and BMP implementation. The BMP will include a constraints map reflecting the sensitive feature mapping.</p> <p>The BMP will include a Biodiversity Monitoring and Evaluation Plan (BMEP) to track and record mitigation success and compliance.</p> <p>The BMP will include a Biorestation Plan (BRP) to ensure restoration of habitats and biodiversity on site to contribute to>NNL and NG.</p> | | | | | BRP approved 3 months after start of construction | |
| 6.2 | <p>The Critical Habitat Assessment (CHA, May 2026) has determined Critical Habitat under EBRD ESR6 paragraph 14(ii)(c) for two Critically Endangered wild pear species, <i>Pyrus tadshikistanica</i> and <i>Pyrus korshinskyi</i>, giving rise to a Net Gain obligation. PIURR to finalise and submit a Biodiversity Action Plan (BAP) and a Biodiversity Offset Management Plan (BOMP) to EBRD for non-objection, specifying offset actions, multipliers, measurable Net Gain (CH species) and No Net Loss (PBF) targets, partnership and layered stewardship arrangements, and a</p> | <p>Critical Habitat is confirmed present on the BSK corridor. Without an approved NGPBAP and BOMP, the project cannot demonstrate ESR6 compliance and risks irreversible biodiversity loss.</p> | <p>EBRD ESR6 (paragraphs 14–16) and ESR6 Guidance Note GN6 (2025); CHA (May 2026); UN CBD (1997); BBOP standards; IUCN/SSC Plant Translocation Guidelines (2013); BAP Section 8; BOMP (BAP Annex B); BMP (ESMP Annex 8) Section 10</p> | <p>ESIA team (Critical Habitat determination). PIURR (develop and submit NGP). EBRD (approve). Contractor (implement NGP; report outcomes in ESHS reporting chain). ESIA team (CHA Critical Habitat determination, completed May 2026). PIURR (develop and submit BAP and BOMP; procure offset partner). EBRD (non-objection). Contractor (implement BMP and offset</p> | <p>NGPBAP and BOMP approved by EBRD before works reach confirmed Critical Habitat sections; monitoring throughout construction until success criteria confirmed met</p> | <p>NGP approved by EBRD before works affect confirmed Critical Habitat. Implementation reported in semi-annual E&S reports. No net loss of Priority Biodiversity Features demonstrated at project completion. BAP and BOMP approved by EBRD (non-objection) before works affect confirmed Critical Habitat. Implementation reported in semi-annual E&S reports; offset mid-term evaluation at year 5</p> | |

| No. | Action | Environmental & Social Risks (Liability / Benefits) | Requirement (Legislative, EBRD ESR, Best Practice) | Resources, Investment Needs, Responsibility | Timetable | Target and Evaluation Criteria for Successful Implementation | Status |
|-----|---|---|---|--|--|---|--------|
| | minimum 20-year offset horizon with five-yearly evaluations. The Biodiversity Offset Programme shall be procured against a methodology specification, with EBRD non-objection (the BGCI/Kulob Botanic Garden Darwin Initiative, ref. 31-017, being a candidate partner). No works affecting confirmed Critical Habitat to commence until the BAP and BOMP are approved. | | | measures; report outcomes in ESHS reporting chain). Ecologist of Record (review). | | and final evaluation at year 20. Net Gain for the two CR Pyrus species and No Net Loss of Priority Biodiversity Features demonstrated. | |
| 6.3 | Construction camp and borrow pits / quarry locations to be sited away from ecologically sensitive areas identified in the ESIA biodiversity baseline. | Avoidance of biodiversity impacts from construction camp placement. | Law on Specially Protected Natural Territories (2011); Law on Environmental Protection (2011); EBRD ESR6; BMP requirements (ESMP Annex 8) | Contractor (propose camp locations). CSC (review against BMP requirements). PIURR (formally confirm compliance before site establishment) | Pre-construction. | Camp locations confirmed compliant before site establishment. | |
| 6.4 | Contractor to complete a Borrow Area Suitability Assessment for each proposed borrow area / quarry, screened against the ESIA biodiversity baseline and Critical Habitat Assessment and the siting constraints in BMP Annex 8 (§5.3) and ESMP §3.2: minimum 100 m setback from the Shurobdaryo and named tributaries; exclusion from PBF buffers and CHA no-go zones; exclusion from intact/semi-natural vegetation where a disturbed alternative exists; exclusion from the 1-in-100-year flood extent; preference for already-disturbed ground. The Ecologist shall confirm in writing that each location is acceptable before any site preparation begins. | Poorly sited borrow areas/quarries risk irreversible loss of Priority Biodiversity Features and damage to Critical Habitat, alongside riverbank/channel destabilisation and flood-zone impacts. | EBRD ESR6; ESR3; Law on Specially Protected Natural Territories (2011); Law on Environmental Protection (2011); CHA (May 2026); BMP (ESMP Annex 8); CESMP C-SG-05; GIIP | Contractor (complete Suitability Assessment; propose sites). Ecologist (written confirmation before site preparation). CSC (review against BMP/ESMP constraints). PIURR (confirm compliance before establishment). | Pre-construction — before any site preparation at each proposed borrow area. | Suitability Assessment and written Ecologist confirmation on file for each borrow area/quarry before site preparation. Zero site preparation without Ecologist sign-off. Zero borrow areas within excluded zones. | |
| 6.5 | Apply seasonal restrictions (e.g. nesting, river works). Implement works timing restrictions: no tree felling and no cutting/excavating of cliff faces identified as bird nesting sites during the bird nesting | Minimise potential ecological impacts on nesting birds. | Law on Fauna (2008) — protection of bird species; Law on Protection and Use of Flora (2004); Forest Code (2011); Bonn Convention (joined 2001); EBRD | Contractor (implement restrictions; document compliance). CSC (verify compliance during site | Throughout construction phase; 1 March to 30 September restriction applies each year | Compliance records maintained and verified | |

| No. | Action | Environmental & Social Risks (Liability / Benefits) | Requirement (Legislative, EBRD ESR, Best Practice) | Resources, Investment Needs, Responsibility | Timetable | Target and Evaluation Criteria for Successful Implementation | Status |
|-----|---|--|--|--|-----------|---|--------|
| | <p>season (1 March to 30 September) unless pre-construction surveys confirm absence of active nests. Where weather limits works between October and February, the Contractor shall plan sequencing accordingly and agree any mitigation measures with the CSC/Engineer. In addition: (i) all in-river works (bridge foundations, cofferdams, gravel extraction, machinery river crossings) are prohibited from November to February for Amu Darya trout (<i>Salmo trutta oxianus</i>) spawning, full corridor length; (ii) a breeding-season no-works buffer applies around each confirmed active cliff-raptor nest during 1 March to 30 September, including the co-located Egyptian Vulture and Cinereous Vulture nests at km 2–4 and the confirmed Egyptian Vulture nests at km 30 and km 34; (iii) a holt exclusion applies around confirmed Eurasian Otter activity near Shahidon during the breeding season; and (iv) at the Bukhara Deer breeding facility at Dashtaro village (km 35), heightened noise, lighting and buffer controls apply during the April to June calving season, coordinated with the facility operator. Buffer extents, exact dates and protocols are as specified in the BMP and the Sensitive Feature Register (BAP Annex C).</p> <p>If realignment is not possible at the raptor nests at KP 2-4 (sensitive feature register items 4 and 5) and nest abandonment occurs. Artificial nests will be installed in collaboration with regional experts in the EAAA, and monitored for adoption as part of the BAP actions to achieve NNL for these species.</p> | | ESR6; BMP (ESMP Annex 8) seasonal restriction schedule | inspections). PIURR (oversight) | | | |

| No. | Action | Environmental & Social Risks (Liability / Benefits) | Requirement (Legislative, EBRD ESR, Best Practice) | Resources, Investment Needs, Responsibility | Timetable | Target and Evaluation Criteria for Successful Implementation | Status |
|-----|--|---|--|---|---|---|--------|
| 6.6 | Monitor biodiversity impacts and implement corrective actions | Undetected in-stream impacts in a Critical Habitat corridor could trigger ESR6 non-compliance and require costly retrospective offsetting. | Law on Environmental Monitoring (2011); Law on Fauna (2008); Law on Environmental Audit (2011); UN CBD (1997); EBRD ESR6; BMP (ESMP Annex 8) | PIURR, Contractor, CSC to monitor | Ongoing | Monitoring results in semi-annual E&S reports. Brook trout population indicator collected annually during construction. | |
| 6.7 | Riverbed and floodplain borrow extraction may only proceed after: (i) CEP environmental permit; (ii) hydraulic assessment confirming no adverse morphological change; (iii) aquatic biodiversity impact assessment; (iv) material quality verification (in accordance with Technical Specifications); and (v) formal Hukumat agreement. Extraction is additionally subject to the November to February in-river works exclusion window (Amu Darya trout spawning) and to silt and turbidity controls at all in-river works regardless of timing. All conditions incorporated into the BMP. | Uncontrolled borrow extraction in an active high-energy river system risks morphological change, habitat loss, and aquatic biodiversity impacts. | Water Code (2000); Law on Environmental Protection (2011); Law on Fauna (2008) — aquatic species protection; Special Water Use Permit (CEP / Tajikgeology); CEP environmental permit; formal Hukumat agreement; UN CBD (1997); EBRD ESR6; ESR3 | PIURR; Contractor, CSC to monitor. | Prior to any riverbed/floodplain extraction. | All permits and assessments obtained; conditions documented. | |
| 6.8 | Monitor induced impacts on Sari Khosor Nature Natural Park: establish visitor baseline before construction; hold annual coordination meetings with park authority; monitor poaching and unauthorised access; implement management responses within 90 days of identifying adverse trends. Prior to mobilisation, consult and document consultation with the managers of Sari Khosor Natural Park and the Nureksky State Reserve in accordance with ESR6, and ensure the Project does not adversely affect the integrity of the values for which they are designated. Monitoring of the Bukhara Deer breeding facility at Dashtaro village (km 35), a remote object of the Park system, to be coordinated with the Park administration. | Improved road access is the primary driver of induced biodiversity risk. Without monitoring, impacts on protected species will be undetected until mitigation options are severely limited. | Law on Specially Protected Natural Territories (2011); Law on Fauna (2008); EBRD ESR6; ESMP Annex 8; Annex 20 | PIURR | Pre-construction baseline; construction phase; Yrs 1–5 of operation | Pre-construction visitor baseline established. Annual coordination meeting records maintained. Sari Khosor section in every semi-annual E&S report. | |

| No. | Action | Environmental & Social Risks (Liability / Benefits) | Requirement (Legislative, EBRD ESR, Best Practice) | Resources, Investment Needs, Responsibility | Timetable | Target and Evaluation Criteria for Successful Implementation | Status |
|------|---|---|--|--|---|--|--------|
| 6.9 | Complete pre-construction specialist surveys before mobilisation: botanical survey of the corridor with a 5 km contextual buffer (confirming <i>Pyrus</i> and <i>Allium suworowii</i> Red Data Book status); Eurasian Otter holt survey; cliff-raptor nest survey; reptile survey (including glass lizard); and aquatic survey (including confirmation of Turkestan Barbel). Survey results to populate the Sensitive Feature Register (BAP Annex C) and inform final micro-siting, no-go demarcation and the BMP. The preconstruction surveys will also confirm quantitative impacts for the BAP against which NNL and NG can be measured. | Up-to-date species locations confirmed and incorporated into design and the Sensitive Feature Register before any ground disturbance. | EBRD ESR6 (paragraphs 10–13); BAP Sections 6–7 (actions P3–P5); BMP (ESMP Annex 8); Law on Fauna (2008); Law on Protection and Use of Flora (2004); RDB (2024) | PIURR (commission); Ecologist of Record (scope and review); qualified specialist surveyors; Contractor (incorporate). | Pre-construction, before mobilisation and before finalisation of detailed design. | Survey reports completed and accepted by the Ecologist of Record; Sensitive Feature Register issued before mobilisation; confirmed in the first semi-annual E&S report. | |
| 6.10 | Undertake a micro-realignment and avoidance review at the nine confirmed wild pear (<i>Pyrus</i>) clusters (km 11, 15, 16, 29, 34, 37, 43, 47 and 48) to retain Critical Habitat trigger individuals in situ wherever feasible. In-design retention at km 29 and km 34 to be recorded in the final design drawings and tender documents before tender finalisation. Translocation by a qualified botanist to be applied only as a last resort where avoidance is demonstrably not feasible. | Avoidance prioritised over translocation; net loss of CR <i>Pyrus</i> individuals minimised; retention recorded in design. | EBRD ESR6 (paragraphs 14–16) and Guidance Note GN6 (2025); BAP Section 7 (action P1); IUCN/SSC Plant Translocation Guidelines (2013); CHA (May 2026) | PIURR; Design Engineer; Ecologist of Record (review and sign-off of translocation protocols); Contractor. | Detailed design stage, before tender finalisation. | Avoidance review documented; km 29 and km 34 retention shown in issued-for-construction drawings before tender finalisation; outcomes reported in semi-annual E&S reports. | |
| 6.11 | Appoint independent biodiversity oversight: an Ecologist of Record (senior independent advisor to PIURR who signs off translocation protocols and advises on adaptive management) and an Independent Monitoring Consultant to verify implementation of the BMP, BAP and BOMP. Both roles to be in place before mobilisation and retained through | Independent technical oversight and verification of biodiversity commitments throughout the Project lifecycle. | EBRD ESR6; BAP Section 9 (governance and monitoring); BOMP (BAP Annex B) | PIURR (appoint and fund); Ecologist of Record; Independent Monitoring Consultant; EBRD (review of monitoring reports). | Before mobilisation; retained throughout construction and the offset implementation period. | Appointments confirmed before mobilisation; independent verification reflected in annual independent biodiversity monitoring reports to EBRD. | |

| No. | Action | Environmental & Social Risks (Liability / Benefits) | Requirement (Legislative, EBRD ESR, Best Practice) | Resources, Investment Needs, Responsibility | Timetable | Target and Evaluation Criteria for Successful Implementation | Status |
|--|--|---|---|--|---|---|--------|
| | construction and the offset implementation period. | | | | | | |
| ESR 8 – Cultural Heritage | | | | | | | |
| 8.1 | Develop and implement an archaeological Chance Finds Procedure (CFP) for all earthworks and ground disturbance. CFP to be submitted within 30 days of contract award, approved by the relevant archaeological authority and PIURR. Train all contractor staff on the CFP before earthworks commence; refresher training six-monthly | Potential damage to archaeological artefacts during construction earthworks. | Law about Culture (No. 2033, 2024); Constitution Art. 44; UNESCO Convention (joined 1992); EBRD ESR8; national archaeological authority approval requirement | Contractor (prepare CFP; deliver training; maintain records). Archaeological authority, PIURR (approve CFP). CSC (verify 100% worker training before earthworks commence). | CFP submitted within 30 days of contract award; training before any earthworks commence; refresher training six-monthly | CFP approved before earthworks commence. 100% of workers trained, verified by CSC. Zero unreported chance finds. Any find triggers immediate works stop and notification to Engineer. | |
| ESR 10 - Information Disclosure and Stakeholder Engagement | | | | | | | |
| 10.1 | Implement the SEP throughout the project lifecycle, including: public disclosure of ESIA, NTS, SEP, and LARP before construction; quarterly community consultations during construction; focus groups for women and vulnerable groups; six-monthly road safety sessions at schools. Assign a dedicated CLO within the PIURR team to manage stakeholder engagement and grievances. Regularly update the SEP and submit a semi-annual stakeholder engagement log (SE log) to EBRD. | Failure to engage communities meaningfully risks loss of social licence, escalation of grievances to the EBRD Project Complaint Mechanism, and community opposition to works. | Law on Environmental Information (2011); Law on Appeals of Individuals and Legal Entities (2016); Aarhus Convention (2001); EBRD ESR10; SEP | PIURR (implement SEP; appoint CLO; submit SE log to EBRD). CLO (day-to-day engagement and grievance handling). CSC (verify engagement activities and GRM operation). | CLO appointed and documents disclosed before construction; ongoing throughout project lifecycle | All documents publicly disclosed before construction. CLO in post before mobilisation. Quarterly consultation records maintained. SE log submitted to EBRD semi-annually. | |
| 10.2 | Maintain and operate GRM (community and worker) | Unresolved grievances can escalate to the EBRD Project Complaint Mechanism, triggering independent review and potential disbursement conditions. | Law on Appeals of Individuals and Legal Entities (2016, No. 1339) Art. 14 — 15-day response for straightforward complaints; 30-day response for matters requiring further study; Aarhus Convention (joined 2001); Law on Environmental Information (2011); EBRD ESR10; EBRD | PIURR; CSC to submit monthly grievance review schedule. | Monthly grievance review; Throughout construction | All grievances acknowledged within 5 working days; resolved within 30 days (15 days for straightforward complaints). GRM log submitted to EBRD semi-annually. Zero grievances older than 30 days without recorded resolution or escalation. | |



| No. | Action | Environmental & Social Risks (Liability / Benefits) | Requirement (Legislative, EBRD ESR, Best Practice) | Resources, Investment Needs, Responsibility | Timetable | Target and Evaluation Criteria for Successful Implementation | Status |
|-----|--------|--|---|--|-----------|---|--------|
| | | | Project Complaint Mechanism (PCM) rules | | | | |