

Annex 5

Environmental and Social Action Plan (ESAP)

The ESAP is based on findings from the ESIA process.

Some actions listed in the ESAP entail the provision of external support. The resources required are largely in the form of technical assistance.

The budgetary needs primarily relate to external costs and do not include e.g. cost of staff at the Ministry of Economy and Finance or Hygiena Ltd. This in kind contribution is however critical for a successful project implementation. Construction related costs are not shown in the table. All budget indications are estimates.

A. GENERAL REQUIREMENTS (for all phases)

No.	Actions	Environmental and Social Risks Liability / Benefits and Comments	Investment Needs / Resources / Responsibility Implementation & Monitoring	Legislative Requirement / EBRD performance requirement / Best practices	Timetable	Target and Evaluation Criteria for Successful Implementation ((Indicators)
1	EHS Management and monitoring (PR 1, affecting PR 2, PR 3 and PR 4)					
1.1	Develop and implement Environment, Health and Safety (EHS) Management System for Tsetkhauri landfill, based on recommendations for Corporate structure for Hygiena Ltd and ISO 14001 and OHSAS 18001.	<p>Reducing risks related to health and safety: for staff, for people living nearby the landfill site, for persons passing by or visiting the site/s</p> <p>Increasing staff knowledge and understanding of the operations</p> <p>Ensuring safe handling of waste and adherent processes at the site, and reduce risks of negative environmental impact</p> <p>Mitigating long term environmental impact after closure</p>	<p>€ 12 000</p> <p>External and own Resources</p> <p>MoFE/Hygiena Ltd¹</p>	<p>EBRD PR1 (PR2, PR4)</p> <p>Best practice</p>	<p>To be completed before issuing the Taking Over Certificate under the Works Contract</p> <p>EHS Mgmt System to be continuously updated thereafter</p>	<p>Corporate EHS Policy, EHS-Management Plan, Health and Safety Risk Assessment, EHS Procedures, Templates in place</p> <p>Operational Manual</p> <p>Environmental and Social Monitoring Plan</p> <p>Emergency Plan</p> <p>Closure plan</p>

¹ MoFE is responsible until Hygiena Ltd. is operational.

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1.2	Develop and implement an Environmental and Social Monitoring Plan for Tseskhauri to avoid negative effects from the landfill operations and for monitoring of the environment, including e.g.: <ul style="list-style-type: none"> • Gas leakage both at the landfill and the gas • Leachate volumes and quality before and after treatment • Storm water runoff quality from the recycling and sorting area • Control of sediment from storm water runoff from the landfill site • Control of littering • Noise & Dust production • Groundwater & Receiving waters • Staff health • Traffic safety • Visual impact 	Mitigate pollution and other negative environmental impact Possibility to identify and correct unforeseen environmental or health impacts Ability to analyze trends over time Transparency of operations and impacts Proper handling of complains and building trust with local community	€ 1,000 Own Resources MoFE/Hygiena Ltd	EBRD PR3 and PR 4 Best practices	To be developed before issuing the Taking Over Certificate under the Works Contract Monitoring Plan to be continuously updated thereafter	Environmental and Social Monitoring Plan Monitoring records Updates/revisions of Environmental Monitoring Plan
1.3	Prepare and implement an Emergency Preparedness and Response Plan as a part of the Operation Manual for Hygiena Ltd. with procedures in the event of an emergency incident such as <ul style="list-style-type: none"> • Gas Explosion at the landfill or at the Gas Treatment facilities • Gas migration • Fire incident (e.g. on the landfill area or at the Gas Treatment Facility) • Serious accident (e.g. on the landfilling area, at the gas treatment facility, at the waste recycling and sorting area) 	Minimize the time period of any Emergency incident Minimize the risk of deaths or serious injuries Minimize damage to the landfill facilities and reduce costs of remediation Minimize operation down-time	€ 1,000 Own Resources MoFE / Hygiena Ltd	EBRD PR2 and PR4 Best Practices	To be prepared before issue of the Taking Over Certificate under the Works Contract To be continuously updated	Emergency Plan prepared Records of incidents, root cause assessments and responses Updates/revisions of the Emergency Plan
1.4	Prevent unauthorized access to the landfill and install a fence and/or wall.	Reduce health risks to persons entering the premises unauthorized	Cost of fence included in	EBRD PR 4 Georgian	Construction phase	Installed fence Information board at

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	Provide guarding service at the landfill.		Construction budget Cost of guards included in Hygiena Ltd operational budget MoFE/ Hygiena Ltd	legislations	Operational phase	entrance Zero tolerance to waste picking communicated to staff (incl. guards)
1.5	Collaborate with nearby health centers and use available statistics from e.g. national level to access relevant data on public health	Reducing risk of overseeing unforeseen health impacts related to the closed dump sites and/or the new landfill Creating possibility to undertake corrective measures if necessary	Own resources MoFE/Hygiena Ltd	EBRD PR 4	During construction phase and operation	Health statistics produced on Batumi, Kobuleti and Tsetskhauri on waste related virus and parasites. # of reported cases (disaggregated to sex/age/geographical location)
1.6	Close the existing non-compliant dumpsites at Batumi and Kobuleti in accordance with the specifications given in the ESIA. Ensure the relevant labour, health and safety and environmental requirements in the ESAP are followed during the closure.	Proper closing may result in positive impact for e.g. biodiversity, landscape, ecosystem services	Own Resources MoFE / Hygiena Ltd	EBRD PR 6	During operation	Follow-up on dumpsite closure activities
	As part of the tendering process, carry out an assessment of the EHS management policies, procedures and management capacities of contractors. Include the Environmental, Social and Health and Safety requirements as described in the ESIA, ESAP, and SEP as contractual requirements for all appointed contractors and sub-contractors.		procurement and legal teams; Construction Manager	EBRD PR1	Standard conditions to be prepared 3 months prior to issue of contract tenders	EHSS clauses are included in contractual arrangements. To be reviewed and agreed by the LTA.

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	All future contractors should have a Construction, Environmental Management Plan (CEMP) that should also include a Transport Management Plan.					
A7	Undertake periodic inspections of the subcontractors to ensure that there is compliance with national laws	Minimise Health and Safety risks Reduce injuries	Internal resource	Best practice EBRD PR1, paragraph 19 EBRD PR2, paragraph 19	Inspections on-going thereafter	Inspection reports
2	OHS and workers rights (PR 2) staffing and retention					
2.1	<p>Prepare and implement a specific Human Resource Policy document outlining policy and procedural requirements regarding labour and working conditions. This should be provided to and implemented for Hygiena Ltd, main contractor and sub-contractor employees. The policy shall address e.g.:</p> <ul style="list-style-type: none"> • Human resource function and management system; • Working conditions (including hours and shifts); • Recruitment planning; • Training; • Terms of employment (employee contracts); • Employment and working conditions for women and men so that there is they are able to access opportunities on an equal basis.; • Child Labour; • Forced labour; • Equal Opportunities/non-discrimination; • Workers organizations; 	<p>Ensuring high company performance and CSR</p> <p>Ensuring that policy and practice correspond</p> <p>Ensuring labour rights of subcontracted staff</p>	<p>Own Resources</p> <p>MoFE / Hygiena Ltd</p>	<p>EBRD PR 2 Best practice</p>	<p>To be completed six (6) months after assignment of corporate development consultant²</p>	<p>Human Resource Policy Documents Reviewed and approval by e.g. Lenders Technical Advisor (LTA) (or the Lenders directly) No. of staff with contracts according to Georgian legislation</p>

² A corporate development consultant will be assigned with the task of setting up the Hygiena Ltd company.

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	<ul style="list-style-type: none"> Workers accommodation; Occupational Health & Safety; proper safety equipment for women and men; Grievance mechanism for employees 					
2.2	<p>Benchmark the workers' wages against other employers in similar sectors in the area and according to their education, years of experience and level of responsibility</p> <p>Revise salaries and salary scales to eliminate gender gaps</p> <p>Communicate salary scales and bonus systems to employees</p>	<p>Ensuring fair salaries</p> <p>Ensuring retention of staff</p> <p>Ensuring that women are not discriminated (include revisions of double salaries, and national holiday additional salaries)</p> <p>Increasing staff motivation</p>	<p>Own Resources</p> <p>MoFE / Hygiena Ltd</p>	<p>EBRD PR 2</p> <p>Best practice</p>	<p>To be completed six (6) months after assignment of corporate development consultant</p>	<p>Annual salary revision</p> <p>Salaries and salary scale correspond to education, years of experience and level of responsibility</p> <p>% of women's salary scale to that of men</p> <p>% of women's salaries to men</p> <p>Staff turn over rate</p>
2.3	<p>Development and implementation of a Recruitment Policy (transparent, meritocratic, for all positions)</p> <p>Development and implementation of a Gender equality and diversity policy and plan</p> <p>Training of HR staff at the waste utility to ensure proper implementation of the Recruitment Policy</p> <p>Development of necessary supporting guidelines (e.g. guideline for appraisal interviews, regular team/staff/management meetings with pre-defined agenda and shared meeting notes, maternity/paternity leave)</p> <p>Monitor employee motivation and satisfaction</p>	<p>Ensuring performance based recruitment, promotion and salary/bonuses</p> <p>Retention of high performing staff</p> <p>High employee motivation</p> <p>Good relations with community</p>	<p>Own Resources</p> <p>MoFE / Hygiena Ltd</p>	<p>EBRD PR 2 (and in relation to high performance in PR 1, 3, 4, 5, 6, 8 and 10)</p> <p>Best practice</p>	<p>To be completed six (6) months after assignment of corporate development consultant</p> <p>Trainings and meetings are permanent actions</p>	<p>Recruitment policy developed/updated</p> <p>% of women/men in management and middle management</p> <p>% of women/men recruited</p> <p>Gender equality plan developed/updated</p> <p>Non-discrimination policy and plan developed/updated</p> <p>No. of HR trained staff in the operation of the waste utility</p>

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						Personal and organizational development tools developed Rate of staff motivation Staff turnover rate
2.4	Job description for all positions and information on workers' rights Provide information on job descriptions and workers right (e.g. right on building workers organizations) to all staff members	Ensuring clear roles and responsibilities within the organization	Own Resources MoFE / Hygiena Ltd	EBRD PR 2	To be completed six (6) months after assignment of corporate development consultant	Updated work descriptions for all positions Workers' awareness rate, with regards to workers rights Rate if staff motivation Staff turnover rate
2.5	Establish an internal grievance mechanism for workers Grievance mechanisms should include a clear structure for: <ul style="list-style-type: none"> • Who to receive complaints relating to closure of existing dump sites and Tsetkhauri landfill respectively • How to handle and register responses to complaints • An agreed time period for responses to be made • Developed criteria for prioritizations of complaints (e.g. what remedial actions are needed, how they should be prioritized and why) • Documentation of all internal complaints • How to involve the workers union/s 	Reducing risk of mismanagement or poor management practices	Own Resources MoFE / Hygiena Ltd	EBRD PR 2	To be completed six (6) months after assignment of corporate development consultant	Register of internal grievances and responses No of internal grievance cases Staff motivation rate Staff turnover rate Budget allocation for health and safety

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	<ul style="list-style-type: none"> How to inform all staff about their rights and how to submit a grievance 					
3	Pollution, prevention and abatement (PR 3)					
3.1	<p>Develop Operation Manual (see above), to encompass procedures to reduce environmental impacts, e.g. Noise, Odour, Spill (e.g. oil, fuel, chemicals), Dust, Landfill gas fires/explosions (green house effects, smoke) , Emission to surface waters and leachate treatment odours, Littering</p> <p>Examples of routines to be implemented, following the Operational Manual:</p> <ul style="list-style-type: none"> Establish and implement a work schedule adhering to local labour regulations In case of unforeseen deviations to the work schedule, affected population should be informed Ensure well-functioning complaints mechanism (internal and external) and ensure immediate response when necessary Refueling in designated areas with spill protection Handling and storing of chemicals in designated areas only Reduce littering or aerosols, risk of fires, risk of odour etc. by daily covering and by surrounding concrete wall Reduce dust by watering of roads and work when necessary Avoid odour by maintenance of aerated lagoons Reduce risk of nuisance due to birds, vermins, insects <p>Reduce noise at the nearby settlements by constructing new access road not passing the houses.</p> <p>Installation of gas collection system Gas extraction equipment shall be installed 3-5 years after the landfill operation starts.</p>	<p>Avoiding and mitigating disturbance for people living nearby the site</p> <p>Avoiding and mitigating potential environmental impacts from the operations</p> <p>Avoiding and mitigating risks for staff</p> <p>Ensuring control, monitoring and evaluation of all operations, thereby allowing for corrective measures to be undertaken if unforeseen impacts are identified</p>	<p>€ 700 000</p> <p>MoFE/Hygiena Ltd, External resources</p> <p>MoFE / Hygiena Ltd</p>	<p>Operational phase</p> <p>EBRD PR3</p> <p>Operation Manual</p> <p>Best practices</p>	<p>Regular inspections of operations procedures</p> <p>Daily checking for excess dust, odour and litter</p> <p>Sampling and analysis according to the permit conditions</p> <p>Landfill gas concentration monitoring, checked minimum monthly</p>	<p>Established Grievance mechanism for cases of disturbances of population</p> <p>Records of incidents and accidents, e.g. spills</p> <p>Records of environmental monitoring</p> <p>Regular environmental reporting to competent authorities</p>

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	<p>Gas Safety manager to be on duty at all times during operation of the gas extraction system.</p> <p>Storm water management Storm water runoff from hard areas will be collected to oil trap.</p>					
4	Health and Safety (PR4)					
4.1	<p>Develop a Health and Safety Plan including Health and Safety Measures to avoid Accidents and Injuries during work for Hygiena Ltd:</p> <ul style="list-style-type: none"> • Safety training for work operation procedures, fire safety, personal protective equipment and for plant and equipment • Fire safety manual • Vehicles to have audible reversing alarms and visible reversing lights • Define and implement codes for communication between drivers and loaders or other workers • Design of traffic routes in order to minimize crossing traffic • Restrict access of people to the landfill cell during landfilling operations • Minimize direct exposure of workers to exhaust pipes • Follow gas safety measures at the site. Use gas warning equipment in necessary conditions. Test before entering into any area/pit, which is suspected to be dangerous. If risk for explosion, evacuate the work place • Provide regular medical checks, vaccinations and procedures for immediate medical care in case of injuries and accidents 	<p>Ensuring workers Health and Safety</p> <p>Reducing occupational health and safety impacts. Common health risks at landfills include:</p> <ul style="list-style-type: none"> • Accidents and injuries • Chemical/toxic exposure • Exposure to pathogens and infectious waste • Risk for explosion or fire 	<p>Own Resources MoFE / Hygiena Ltd</p>	<p>EBRD PR 2 (and PR 4)</p> <p>Best Practices</p>	<p>Should be completed before issue of the Taking Over Certificate under the Works Contract</p>	<p>Health and Safety Plan Health and Safety Training Register of incidents and impacts (when applicable)</p>

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4.2	<p>Firefighting</p> <ul style="list-style-type: none"> • Install necessary signs and instructions to inform staff and other person entering the site • Install firefighting equipment at the waste facility to reduced risk to workers and public • Fire- and explosion protected equipment required in parts of the facility due to landfill gas safety measures. These requirements are specified in the Tender Documents for Construction Works. • Keep the Municipal fire brigade informed about the layout of the facility and gas extraction system 	<p>Reducing risk of fire and risk of ignition of landfill gas Reducing impacts of a fire or an explosion</p>	<p>€ 3,000 External and own recourses MoFE / Hygiena Ltd</p>	<p>EBRD PR 2 (and PR 4) Best practices</p>	<p>Should be completed before startup of operations Tests on Completion of Plant/Equipment under the Works Contract</p>	<p>Signs installed Fire prevention equipment installed. Record of fire brigade visit and submission of supporting documentation Development/update of firefighting procedures # workers trained annually</p>
4.3	<p>Supply Personal Protection Equipment to all staff as necessary (sizes to fit both men and women). Provision of clear instructions on when and how to use the equipment. Mandatory equipment for operational staff to include:</p> <ul style="list-style-type: none"> • Protective clothing, gloves, safety shoes • Respiratory face masks • Noise protection • Hard hat • First Aid including eye wash • Mobile phone 	<p>Ensuring workers health and safety</p>	<p>€ 2,000 Own Resources MoFE / Hygiena Ltd</p>	<p>EBRD PR 2 Best Practices</p>	<p>Should be completed before startup of operations Certificate under the Works Contract</p>	<p>All staff has access to proper Personal Protection Equipment # workers using personal protection equipment where required</p>
5	Resettlement and economic displacement (PR 5)					
5.1	<p>Implement the Resettlement /Livelihood Restoration Plan (R/LRF) in relation to identified:</p> <ul style="list-style-type: none"> - 2 plots on Tsetskhauri landfill with 3 families - 4 (of 7 plots) within Tsetsklauri sanitary zone 	<p>Ensuring awareness of resettlement and economic displacement needs and knowledge of who may be entitled to compensation Clarifying Georgian legal requirements compared to EBRD</p>	<p>External resources MoFE / Hygiena Ltd</p>	<p>EBRD PR 5 (and PR 10)</p>	<p>Developed prior to construction</p>	<p>RAP document developed Identification of possibly affected parties/persons</p>

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	<ul style="list-style-type: none"> - plots with houses on the boarder to Tsetsklauri sanitary zone - plots used for crops on Tsetsklauri landfill area - Waste pickers at Batumi and Kobuleti landfills - 9 shelters at Batumi landfill (North part) - 2 shelters with farming at Batumi landfill (South part) 	requirements				
5.2	Implement the Resettlement Action Plan (RAP), including census and cut-off date for identifying project affected population (PAPs)	Ensuring proper compensation of resettled/economically affected persons: Involvement of community in early planning stages, correct and timely information to all stakeholders, just handling and compensation of the people in the households affected by the landfill and in the sanitary zone assured by proper implementation of the RAP	External and own resources Process in dialogue with: Adjara government, Kobuleti and Batumi Municipality MoFE / Hygiena Ltd	EBRD PR 5 (refer also to SEP) Georgian legislation	Prior to first disbursement	Approved RAP
5.3	Compensation in funds and in-kind carried out according to RAP and/or LRF	Ensuring proper compensation of resettled persons	Own resources MoFE / Hygiena Ltd	EBRD 5	During construction of Tsetsklauri and closure of Batumi and Kobuleti landfills	<p>Report on: € or inkind compensations to PAP for economic displacement (where and for what, disaggregated by sex and age)</p> <p>Report on: € or in-kind compensations to PAP for resettlement (where, for what, disaggr. by sex and age)</p>
6	Biodiversity (PR 6)					

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6.1	Develop and implement an Environmental Monitoring Plan (see above)	Ensuring monitoring and evaluation of potential impact on biodiversity, ensuring corrective actions to be undertaken if/when necessary	Internal resources MoFE / Hygiena Ltd	EBRD 6	See above	See above
7	Cultural heritage (PR 8)					
7.1	Contracted entrepreneur/s and sub-contractor/s to be required to immediately report and document any chance finds during construction Development of chance find procedures Staff to receive trainings on handling of cultural heritage (e.g. involve Ministry of Culture)	The purpose of this action is that any artefacts excavated and that is meaningful in terms of cultural heritage issues are properly taken care of	Own resources Support/dialogue: Ministry of Culture MoFE / Hygiena Ltd	EBRD PR 8 National legislation	Project start and at all subcontractin g activities	Chance find procedures at Hygiena Ltd. % of ToRs for sub- contracting including chance finds requirements No. of trainings
8	Stakeholder engagement (PR 10)					
8.1	Adopt and implement the Stakeholder Engagement Plan including routines for managing grievances (Gender perspective will be included in the stakeholder involvement and shall be reflected in the Plan. Since it is a predominant female responsibility to manage household waste (and any potential recycling initiatives), and since women more likely pass their knowledge to their children, it is crucial that women are specifically targeted in the SEP)	General information to stakeholders about project objectives and	External and own resources MoFE / Hygiena Ltd	EBRD PR10 Best Practices	Before construction is initiated Continuously during project implementatio n	Pls refer to SEP
8.2	Outreach to Project affected population (PAP)	To ensure that PAPs are informed about project and solutions on resettlement and economic displacement are found for Batumi, Kobuleti and Tsetskhauri landfills Mitigate social unrest in Tsetskhauri	External and own resources MoFE / Hygiena Ltd	EBRD 10 (and 5)	Before construction	Pls refer to SEP and RAP

B. CONSTRUCTION PHASE (specifically for this period only)

No.	Action	Environmental and Social Risks Liability / Benefits and Comments	Investment Needs / Resources / Responsibility Implementation & Monitoring	Legislative Requirement / EBRD performance requirement / Best practices	Timetable Action to be completed by	Target and Evaluation Criteria for Successful Implementation
9	General Environmental and Social Performance of construction activities					
9.1	<p>MoFE/Hygiena Ltd to require every Contractor to prepare a Construction Environmental and Safety Management Plan (CESMP), that should in turn be approved by the MoFE/Hygiena Ltd</p> <p>The CESMP should describe the Contractor's safety procedures, incident procedures and environmental impact mitigation measures and monitoring program</p>	<p>Mitigating personnel injuries, ensuring efficient response to incidents</p> <p>Protecting the environment and upholding good public relations</p>	<p>Construction costs</p> <p>Construction Company</p> <p>MoFE / Hygiena Ltd</p>	<p>EBRD PR3</p> <p>Best practices</p>	<p>Construction Phase</p>	<p>Engineer/Employer has approved the CESMP</p> <p># of accident</p> <p># of complains</p> <p>Established public grievance mechanism</p>
9.2	<p>Contractor to avoid and mitigate noise (to be included in CESMP)</p> <ul style="list-style-type: none"> Communicate work schedule to affected residents before construction commences. Carry out construction works only during day time. (regular working hours refer to labour regulations) In case of unforeseen delays to the work schedule, inform the affected residents 	<p>Minimized disturbance to population during construction phase</p>	<p>Construction costs</p> <p>Construction Company</p> <p>MoFE / Hygiena Ltd</p>	<p>EBRD PR3</p> <p>Best practices</p>	<p>Construction Phase</p>	<p>Monthly inspection of construction works to monitor conformance with construction work schedule</p> <p># of Complaints</p>
9.3	<p>Examples of measures to avoid environmental impacts, to be included in CESMP:</p> <ul style="list-style-type: none"> Pre-agreed work schedule including schedule when which company will be present at the construction site Emergency Plan Safety and Health Plan for Construction Works incl. traffic safety Spill Prevention Plan Soil Handling of Excavated Material and Storage Plan (incl. measure how to pile earth to prevent erosion, where to use earth after storage e.g. for roads, daily cover, cover layer etc.) Filled embankments according to construction 	<p>Minimizing risk of contamination of soil/surface water/groundwater during construction</p> <p>Minimizing soil erosion/compaction during earthworks</p> <p>Minimizing impact from traffic (dust, noise, safety)</p>	<p>Construction costs</p> <p>Elaboration by Construction company prior to construction; implementation throughout construction by Construction Company under supervision of contracted Supervision company</p> <p>Designated Construction's Site Manager and EHS Responsible</p>	<p>EBRD PR3</p> <p>Best practices</p>	<p>Prior to start and during construction phase</p>	<p>Construction contractor's Site Manager and EHS Responsible in place</p> <p>Construction site management plan, incl. work instructions for environmental aspects, in place and adhered to</p> <p>Internal auditing and reporting by</p>

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	<p>plan, e.g. slopes, designs, cover material, landscaping, planting</p> <ul style="list-style-type: none"> • Hazardous Material Handling and Storage Plan • Construction Waste Management Plan • Minimizing vehicle movements on excavated ground during wet weather • Construction Site Closure Plan • Safe handling of oils, chemicals and liquids • Refueling and cleaning of vehicles only at designated areas, fitted with proper pollution prevention and mitigation measures (i.e. not at construction site) • Stockpiling of soil at distance from sensitive areas • When necessary, water areas to reduce dust • Use of covered trucks to reduce dust • Install speed limits for unpaved roads • A monitoring system will be installed in order to measure compliance with objectives • Routine for chance find of cultural heritage 		<p>MoFE / Hygiena Ltd (supervision/follow-up)</p>			<p>contractor Records of training</p>
9.4	<p>Construct the new landfill according to project plans, and in accordance with the EC directive for landfills for non-hazardous waste</p>	<p>Preventing future pollution of soil, surface water and groundwater</p>	<p>Construction Costs Construction company MoFE / Hygiena Ltd (supervision/follow up)</p>	<p>EBRD PR3 Council Directive 1999/31/EC on landfill of waste</p>	<p>During construction phase</p>	<p>Supervision by the contracted supervision company</p>
9.5	<p>MoFE/Hygiena to develop a Supply Chain Policy, to be included in all contracts with Contractors</p>	<p>Preventing poor environmental and/or social management of suppliers</p>	<p>Own resources (development of Policy) Construction costs (implementation)</p>	<p>Best practices</p>	<p>During construction phase</p>	<p>Follow-up on Contract</p>

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			Construction Company (implement) MoFE/Hygiena Ltd (follow-up)			