

SKUODAS CLUSTER PROJECT - ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP)

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, 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	Implement an integrated Environmental and Social Management System (ESMS), including an E&S Policy and clearly defined roles and responsibilities within European Energy and its contractors.	Systematic E&S management	ESR 1	Own resources, with help of external consultants if required. Responsibilities – to be assigned.	3 months after commencing the construction	ESMS approved and operational; dedicated E&S/HSE team appointed.	

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1.2	Develop and implement a Contractor Environmental and Social Management Plan (C-ESMP) and a robust subcontractor audit programme.	Management of contractor and subcontractor E&S risks	ESR 1 / ESR 2/ ESR 4	Own resources, with help of external consultants if required. Responsibilities – to be assigned.	3 months after commencing the construction	Contractor agreements include binding E&S requirements; C-ESMP approved and implemented; subcontractor audit programme operational.	

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1.3	Appoint an Environmental, Health, Safety and Social (EHSS) Manager for the Project and establish an EHSS management system covering the construction and operational phases. The system shall include internal audits of contractors and project-specific E&S performance indicators (KPIs).	Ensuring implementation of corporate policies and applicable EBRD requirements.	ESR 1 / ESR 2/ ESR 4	Own resources, with help of external consultants if required. Responsibilities – to be assigned.	3 months after commencing the construction KPIs operational by commissioning	EHSS Manager appointed; EHSS management system operational; project-specific KPIs developed and monitored.	
1.4	Implement environmental, health and safety and social policies and procedures through a comprehensive E&S management system.	Effective and consistent management of E&S risks and impacts.	ESR 1	Own resources, with help of external consultants if required. Responsibilities – to be assigned.	Ongoing	Documented policies and procedures implemented and periodically reviewed.	

1.5	Develop and Implement a Supply Chain Management System (SCMS). Undertake technical audits of module and inverter suppliers to verify chain-of-custody requirements and the origin of components identified in the Bill of Materials for solar modules and cells. Enhance existing supply chain processes through a robust, documented system to identify, manage and remediate supply chain risks associated with labour exploitation, as well as other significant environmental and human rights risks and impacts. The system shall provide for supply chain traceability, labour audits and third-party verification	Risk of the Project being exposed to forced labour, labour exploitation or human rights violations within the supply chain, including the polysilicon/silicon supply chain.	ESR 1 / ESR 2	Own resources, with help of external consultants if required. Responsibilities – to be assigned.	Prior to signing supply contracts	Evidence of implementation of the SCMS, including due diligence reports, supply chain risk assessments, contractual clauses, traceability documentation and labour audit reports.	
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	proportionate to the identified risks.						
1.6	Update the Climate Change Risk Assessment (CCRA) 10 years after commencing the operation to check if all "current" recommendations are still valid.	Risk of damage to transmission cables and substations due to climate-related hazards, including pluvial flooding and extreme weather events not covered by the initial CCRA.	ESR 1	Own resources, with help of external consultants if required. Responsibilities – to be assigned.	10 years after commissioning	Updated climate risk assessment submitted to the EBRD.	
1.7	Implement an automated shadow flicker curtailment system for the wind turbines.	Risk of excessive shadow flicker exposure at sensitive receptors.	ESR 1/ ESR 4	Own resources, with help of external consultants if required. Responsibilities – to be assigned.	Prior to commercial operation	Shadow flicker control system operational; shadow flicker exposure at sensitive receptors remains within the applicable project threshold.	

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1.8	Provide the EBRD with an annual report covering the legal status of the Project, significant environmental, health, safety and social matters, stakeholder engagement activities, grievances and complaints, and GHG emissions, as applicable.	Ensuring transparency and enabling the EBRD to monitor implementation of the ESAP and the Project's E&S performance.	ESR1/ ESR 3/ ESR 10	Own resources, with help of external consultants if required. Responsibilities – to be assigned.	Annually throughout the financing period	Annual Environmental and Social Report (AESR) submitted to the EBRD in accordance with the financing agreement and ESAP.	

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ESR 2	Labour and Working Conditions						

2.1	Implement Labour Management Procedures, a worker grievance mechanism and oversight arrangements for worker accommodation. Ensure compliance with ESR 2 and Lithuanian labour legislation, including the Labour Code of the Republic of Lithuania. Cascade applicable ESR 2 requirements to the EPC Contractor and all subcontractors through binding contractual clauses, E&S onboarding and targeted training. Ensure that all workers, including foreign and migrant workers, are legally employed, formally registered and receive all legally required wages and social security contributions. Undertake regular,	Risk of non-compliance with labour legislation and ESR 2 requirements, particularly within contractor and subcontractor workforces, including migrant workers. Risk of illegal employment, unpaid wages, excessive working hours, recruitment fees and retention of identity documents.	ESR 2	Own resources, with help of external consultants if required. Responsibilities – to be assigned.	3 months after commencing the construction and throughout construction and operation, as applicable	Labour Management Procedures and worker GM implemented; contractor/subcontractor compliance verified through audits; findings and corrective actions documented and reported.	
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	independent E&S audits, payroll reviews and confidential worker interviews to verify compliance with labour rights, working hours and overtime requirements, wage payments, and the prohibition of worker-paid recruitment fees and passport retention.						
2.2	Implement a policy and procedures addressing gender-based violence and harassment (GBVH), including a Contractor and Subcontractor Code of Conduct applicable to all workers.	Risk of harassment, GBVH and other inappropriate behaviour associated with the influx of workers, including potential impacts on local communities.	ESR 2/ ESR 4	Own resources, with help of external consultants if required. Responsibilities – to be assigned.	3 months after commencing the construction	Code of Conduct implemented and communicated to all workers; relevant training completed; confidential reporting channels available.	

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ESR 3	Resource Efficiency and Pollution Prevention and Control						
3.1	Develop and implement a Construction Environmental Management Plan (CEMP), including measures for dust suppression, construction noise management, waste management, spill prevention and response, and protection of soil and water resources.	Risk of soil and groundwater contamination and nuisance impacts, including dust and noise affecting nearby residents.	ESR 3/ ESR 4	Own resources, with help of external consultants if required. Responsibilities – to be assigned.	3 months after commencing the construction	CEMP approved and implemented; no significant pollution incidents; construction noise and dust monitored and managed in accordance with applicable requirements.	
3.2	Establish a system for reporting GHG emissions and resource efficiency indicators, including water, fuel and energy consumption.	Lack of measurable data on the Project's resource efficiency and GHG performance.	ESR 3	Own resources, with help of external consultants if required. Responsibilities – to be assigned.	First annual reporting cycle following commencement of construction	Annual E&S report includes relevant GHG and resource consumption data.	

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3.3	Implement measures to manage operational wind turbine noise, including the use of appropriate turbine operating modes and sector-specific curtailment where required, based on post-construction monitoring results.	Risk of exceeding applicable operational noise limits at sensitive receptors.	ESR 3	Own resources, with help of external consultants if required. Responsibilities – to be assigned.	From commencement of turbine operation	Post-construction noise monitoring confirms compliance with applicable noise limits at sensitive receptors; corrective measures implemented where required.	
ESR 4	Health, Safety and Security						
4.1	Develop and implement an Emergency Preparedness and Response Plan (EPRP), covering relevant emergency scenarios, including BESS fire, electrical incidents, spills, traffic accidents and other credible emergency events. Conduct drills and training for relevant personnel.	Risks to worker, community and public safety.	ESR 4	Own resources, with help of external consultants if required. Responsibilities – to be assigned.	Prior to commissioning / prior to relevant construction activities	EPRP approved and implemented; emergency drills and training completed and documented.	

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4.2	Use anti-reflective coatings (ARC) on photovoltaic panels.	Risk of glare affecting road users and nearby residents.	ESR 4/ ESR 1	Own resources, with help of external consultants if required. Responsibilities – to be assigned.	Prior to procurement of PV panels	Manufacturer's technical documentation confirms the specified low-reflectance properties of the panels.	

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ESR 6	Biodiversity Conservation and Sustainable Management of Living Natural Resources						
6.1	Implement the bird and bat collision risk mitigation measures specified in the BMMP, including seasonal bat curtailment and/or automated detection and shutdown, real-time bird migration monitoring and turbine shutdown during high-risk periods, and temporary turbine shutdown during bird-attracting agricultural activities. Apply an adaptive management approach based on monitoring results.	Risk of bird and bat collision mortality during turbine operation; potential impacts on sensitive species and migration routes.	ESR 6	Own resources, with help of external consultants if required. Responsibilities – to be assigned.	Pre-construction and throughout the operational phase, with seasonal curtailment and monitoring implemented in accordance with the BMMP.	All applicable BMMP mitigation measures implemented and documented; turbine curtailment/shutdown measures operational; biodiversity monitoring undertaken and reported; mitigation measures reviewed and adjusted where monitoring identifies elevated collision risk.	

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6.2	Implement an Invasive Alien Species Management Plan (IASMP), including measures addressing <i>Lupinus polyphyllus</i> and other invasive alien species identified during surveys.	Risk of spread of invasive alien species during construction.	ESR 6	Own resources, with help of external consultants if required. Responsibilities – to be assigned.	Prior to commencement of earthworks	IASMP implemented; vehicle and machinery hygiene measures in place; identified IAS areas appropriately managed and monitored.	
6.4	Implement amphibian trapping and translocation measures. Undertake pre-construction amphibian surveys and, where required, implement supervised trapping and translocation of amphibians from areas affected by construction works to suitable receptor habitats, in accordance with applicable permits and ecological requirements.	Risk of injury or mortality of amphibians during construction and site preparation.	ESR 6	Own resources, with help of external consultants if required. Responsibilities – to be assigned.	Prior to and during site preparation and construction works, as required.	Pre-construction surveys completed; all required trapping and translocation measures implemented and documented; no avoidable amphibian mortality associated with site clearance and construction activities	

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ESR 8	Cultural Heritage						
8.1	Develop and implement a Cultural Heritage Management Plan (CHMP) and Chance Finds Procedure (CFP), where relevant to the Project.	Risk of unexpected discoveries of archaeological or other cultural heritage during construction, including heritage associated with river corridors and other areas of archaeological potential.	ESR 8	Own resources, with help of external consultants if required. Responsibilities – to be assigned.	Prior to commencement of earthworks	CHMP and CFP approved, incorporated into contractor requirements and implemented; relevant workers trained.	
8.2	Implement appropriate physical security measures to protect archaeological finds or heritage assets identified during construction from theft, damage or unauthorised removal.	Risk of theft, looting and illicit trafficking of archaeological artefacts discovered during excavation.	ESR 8	Own resources, with help of external consultants if required. Responsibilities – to be assigned.	During construction, if applicable	Appropriate security measures implemented where finds are identified; no incidents of theft or unauthorised removal reported.	

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ESR 10	Information Disclosure and Stakeholder Engagement						
10.1	Implement and disclose an accessible Project Grievance Mechanism, including measures to overcome language and accessibility barriers. Provide grievance forms and information in Lithuanian and ensure that appropriate local contact arrangements are available	Risk of escalation of community concerns and reduced trust in the Project.	ESR 10	Own resources, with help of external consultants if required. Responsibilities – to be assigned.	Throughout Project implementation	Grievance Mechanism operational and publicly accessible; appropriate local contact point established; grievances recorded, investigated and responded to within defined timeframes.	

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10.2	Publicly disclose the Stakeholder Engagement Plan (SEP) and Grievance Mechanism (GM), including information on how stakeholders can raise concerns safely and confidentially.	Risk that local residents do not report concerns regarding noise, shadow flicker or other impacts due to lack of awareness or concerns about retaliation.	ESR 10	Own resources, with help of external consultants if required. Responsibilities – to be assigned.	Prior to commencement of stakeholder engagement and throughout Project implementation	SEP and GM publicly available on the Project website; accessible and confidential grievance channels established; information periodically updated.	
10.3	Provide information on stakeholders' right to escalate complaints to the EBRD Independent Project Accountability Mechanism (IPAM).	Lack of awareness among local stakeholders of the EBRD's independent accountability mechanism.	ESR 10	Own resources, with help of external consultants if required. Responsibilities – to be assigned.	Throughout Project implementation	SEP and grievance materials include up-to-date information and contact details for IPAM in Lithuanian.	