



Skuodas Cluster Hybrid Project

Environmental and Social Management
Plan (ESMP) Framework

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Environmental and Social Management Plan (ESMP) Framework

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LIST OF ACRONYMS & ABBREVIATIONS

Acronym	Description
AoI	Area of Influence
BESS	Battery Energy Storage System
BMMP	Biodiversity Monitoring and Management Plan
C	Construction
CEMP	Construction Environmental Management Plan
CHMP	Cultural Heritage Management Plan
C-ESMP	Contractor Environmental and Social Management Plan
D	Decommissioning
EE	European Energy A/S
EMP	Environmental Monitoring Plan
EPRP	Emergency Preparedness and Response Plan
ERM	Environmental Resources Management
ESIA	Environmental and Social Impact Assessment
E&S	Environmental and Social
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESR	Environmental and Social Requirement
EBRD	European Bank for Reconstruction and Development
GBVH	Gender-Based Violence and Harassment
GHG	Greenhouse Gas
GIIP	Good International Industry Practice
HD	High Definition
HSE	Health, Safety and Environment
HV	High Voltage
IASMP	Invasive Alien Species Management Plan
IFC	International Finance Corporation
IED	Industrial Emissions Directive
LAeq	Equivalent Continuous Sound Level
Lmax	Maximum Sound Level
MoC	Management of Change
MSDS	Material Safety Data Sheet
MV	Medium Voltage
O	Operation
OHS	Occupational Health and Safety

Acronym	Description
PPE	Personal Protective Equipment
PV	Photovoltaic
SEP	Stakeholder Engagement Plan
TMP	Traffic Management Plan
WTG	Wind Turbine Generator

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1. INTRODUCTION

The Skuodas Hybrid Project (the Project) is a hybrid development comprising wind and photovoltaic power generating assets and a battery energy storage system (BESS) developed by European Energy A/S in the Skuodas District Municipality, Klaipėda County, Lithuania. This document presents the Environmental and Social Management Plan (ESMP) Framework which establishes the requirements of the Environmental and Social Management Plan (ESMP) and the list and content of the management plans to be developed for the Project's Environmental and Social Management System (ESMS).

The Framework of management plans defined in the present document will establish the processes required to achieve compliance with applicable national legislation, permit conditions, lender requirements, including the European Bank for Reconstruction and Development (EBRD) Environmental and Social Policy (2024) and Environmental and Social Requirements (ESRs), as well as relevant international good practice.

Consistent with EBRD ESR1, the management plans apply the mitigation hierarchy to environmental and social management of avoidance, minimisation, restoration, offset/compensation seeking firstly to avoid adverse impacts, minimising them when avoidance is not technical feasible and restore the affected resources and livelihoods where impacts occur, finally implementing compensatory or offset measures where residual significant impacts remain. The Framework also promotes enhancement measures and opportunities to improve environmental and social outcomes where feasible.

2. ESMP FRAMEWORK OBJECTIVES

This ESMP Framework provides the overarching management structure for the Project and establishes the requirements for the development and implementation of detailed topic-specific management plans, procedures and programmes. These includes, where relevant, plans addressing biodiversity and ecosystem services, labour and working conditions, community health and safety, stakeholder engagement, traffic and transport, waste management, pollution prevention, emergency preparedness and response, cultural heritage, contractor management, and other environmental and social aspects relevant to the Project.

The framework provides indication of the plans to be prepared along the whole life of the project (i.e. Construction (C), Operations (O) and decommissioning (D) phases). Specific mitigation measures, monitoring requirements, operational controls, or implementation procedures are not developed in this document and will be developed within the ESMP and the relevant topic-specific management plans (being some of them already developed within the ESIA procedure).

The list of management plans within this ESMP framework and the specific plans contents may be further refined, updated, or supplemented/reduced as the Project progresses through subsequent phases and additional environmental and social risks, impacts, or management requirements are identified. Accordingly, this ESMP should be considered as a living document.

3. PROJECT'S MANAGEMENT PLANS

The ESMP framework identifies the following management Plans that will be developed for the implementation of the Project ESMS.

TABLE 3-1 LIST AND CONTENT OF PROJECT'S MANAGEMENT PLANS

Plan	Project Phase*	Description
Environmental and Social Management Plan (ESMP)	C, O, D	The ESMP sets the standards of environmental performance for the Project. This ESMP will translates the mitigation and monitoring commitments identified in the Project ESIA into an implementation framework for the entire Project lifecycle. It will delineate the management processes, organisational arrangements, mitigation measures, monitoring requirements and implementation mechanisms through which the Project will manage its environmental and social aspects throughout its lifecycle. Management actions for some aspects may not require a standalone management plan and will be integrated as chapters of the ESMP, specifically: water, stormwater and drainage management; soil, earthworks, erosion and reinstatement management; waste management; resource efficiency and pollution prevention, landscape and visual management and shadow flicker monitoring and management. Here is reported a simplified structure of the ESMP: • Introduction; • Applicable Standards; • Roles and Responsibilities; • Summary of Residual Environmental and Social Impacts and Mitigation Plan, Including the Environmental and Social Mitigation and Monitoring Matrix Environmental and social impact summaries by topic; • Framework of management plan (content of the present document); • Training; • Monitoring, Reporting and Review, Including audit; • Management of Change (MoC).
Construction Environmental Management Plan (CEMP)	C	The CEMP will establish the framework, procedures, roles and responsibilities necessary to manage and mitigate environmental impacts associated with Project construction activities. The Plan will be based on the ESIA ESMP and will be aimed at providing contractors and subcontractors with more in details indication on the construction impacts and mitigation. The CEMP will be developed in accordance with applicable national legislation, lender requirements, including EBRD ESR1 and GIIP. The main objectives of the CEMP are as follows: • To ensure that construction activities are undertaken in compliance with applicable environmental requirements and Project commitments; • To avoid, minimize and mitigate adverse environmental impacts associated with construction activities; • To establish environmental management procedures, responsibilities, monitoring and reporting requirements for contractors and subcontractors; • To promote continual improvement in environmental performance during construction.

Plan	Project Phase*	Description
		To achieve these objectives, the CEMP will include: • Environmental roles, responsibilities and governance arrangements; • Procedures for implementing mitigation measures identified in the ESIA; • Environmental training and awareness requirements; • Inspection, monitoring and reporting procedures; • Incident notification, investigation and corrective action procedures; • Environmental performance review and continuous improvement mechanisms. The Plan will also define the environmental requirements applicable to contractors and subcontractors, including compliance monitoring and auditing arrangements. As part of the CEMP, Construction Materials and Borrow Area will be considered.
Air Quality and Dust Management Plan	C	The Air Quality and Dust Management Plan will outline the procedures and control measures to minimize and monitor air emissions generated during construction activities (including GHG), in compliance with international standards such as the IFC EHS Guidelines and EU Industrial Emissions Directive (IED). The plan will also include a description of inspection procedures and adaptive responses to be adopted in case of exceedances.
Noise and Vibration Management Plan	C, O	The Noise and Vibration Management Plan will define the approach to assess, control, and monitor noise emissions associated with construction activities, ensuring compliance with relevant international guidelines such as the IFC EHS Guidelines for Noise. The Objectives of the Plan include: • it will cover 24h a day operation; • ensure that noise levels generated by the Project remain within regulatory thresholds (as per Annex B of the ESIA) and do not cause nuisance or health risks to workers or nearby sensitive receptors; • define and implement appropriate mitigation measures to ensure noise limits are reached; • establish a noise monitoring program; • define roles and responsibilities for implementing noise control measures and monitoring; • outline procedures for community communication and complaint response mechanisms related to noise disturbances; • ensure training of construction and operations personnel on noise minimization practices and compliance responsibilities. The Noise Management Plan will be reviewed and updated based on monitoring results and potential changes to the project layout or equipment. It will also be linked to the Community Health and Safety Plan, Environmental Monitoring Plan, the stakeholder engagement plan and community and workers grievance mechanisms and Traffic Management Plan, particularly where mobile sources contribute to cumulative noise impacts.

Plan	Project Phase*	Description
Biodiversity and Monitoring Management Plan (BMMP)	C, O	The BMMP is the main plan for managing biodiversity risks and mitigation measures for habitats, flora, fauna and sensitive ecological receptors during construction and early operation. The BMMP is developed in accordance with applicable national legislation, lender requirements, including EBRD ESR6 and GIIP. The Plan includes the following objectives as a minimum: - to generate and maintain an awareness of the sensitivity of habitats and ecosystems, as well as wildlife surrounding the Project and in the area of influence; - to provide clear and concise procedures for: - detection, reporting & recording of migratory birds, bats and wildlife incidents; - avoidance of incidents through defined management and mitigation measures; - minimize interactions with Project infrastructures and operations (e.g. wildlife collisions with infrastructures, prevention of habitat degradation); - to define effective mitigation measures to minimize the project's impacts on biodiversity; - to define the monitoring and reporting procedures to ensure the effective implementation of mitigation measures and ongoing compliance with Project commitments and applicable standards.
Invasive Alien Species Management Plan (IASMP)	C, O	The Invasive Alien Species Management Plan indicates measures to prevent, monitor and control the introduction or spread of invasive alien species during vegetation clearance, earthworks, soil movement and reinstatement. The plan describes the monitoring programme for identification and control of invasive and alien species across the different project phases, defining parameters, survey area, duration, frequency and main equipment. It also identifies the pathways through which invasive species could be introduced or spread by project activities and specify the hygiene, inspection, material handling and reinstatement controls required to prevent colonisation of disturbed areas.
Environmental Monitoring Plan (EMP)	C, O	The Environmental Monitoring Plan (EMP) will be developed in line with EBRD ESRs and national requirements. The main objectives of the Environmental Monitoring Plan are as follows: Detail the implementation of the monitoring strategy proposed in the ESIA detailing timelines, methodology, roles and responsibilities and reporting. The environmental monitoring serves as: - Verification of the environmental baseline: to confirm the environmental scenario used in the ESIA and to characterize the baseline environmental conditions, which will serve as a reference for comparison with subsequent project phases and monitoring activities. - Impact monitoring: to detect reference parameters and assess variations from the baseline scenario during construction. These activities enable verification of the

Plan	Project Phase*	Description
		effectiveness of the adopted mitigation measures and support the planning of any necessary corrective actions. To achieve these objectives, the EMP includes the following core activities: - Monitoring planning: to identify and confirm monitoring components, monitoring frequency for each project phase, details the monitoring locations and number of monitoring points via production of relevant maps and the parameter sets to be analysed. In conclusion, the EMP defines: - the monitoring objectives and the proposed methodological approach, including sampling techniques and analytical parameters that describe the qualitative and quantitative status of the environmental component/factor, enabling the assessment of its spatial and temporal evolution, consistency with the impact forecasts in the ESIA, and the effectiveness of the mitigation measures adopted; - the spatial and temporal articulation of monitoring activities; - the quality control, validation, analysis, and data processing methodologies for evaluating temporal variations in analytical parameters and identifying any anomalies during environmental monitoring; - the methodologies for verifying and assessing the effectiveness of corrective actions.
Contractor Environmental and Social Management Plan (C-ESMP)	C, O	The C-ESMP will be developed to ensure that all contractors and subcontractors working on the Project comply with applicable legal requirements and adhere to Project E&S policies and performance standards. The C-ESMP will also include an operational audit program for subcontractors. As part of the C-ESMP, the following key aspects will be considered: - Local Procurement Plan. - Local Content Plan.
Stakeholder Engagement Plan (SEP)	C, O	The SEP establishes procedures for constructive engagement and continuous dialogue that are essential to good business practice and corporate citizenship, as well as Project risk management and performance improvement. It's a dynamic document that describes how the Project has and will continue to engage with external stakeholders as the Project progresses through its lifecycle. The SEP will support implementation of commitments identified through the ESIA and associated management plans, including those relating to land access, livelihoods, community health and safety, traffic management, security arrangements and grievance management. The Plan includes: - description of national regulatory and international standards; - identification and analysis of the Project stakeholders; - summary of engagement activities undertaken to date; - strategy and proposed engagement actions with stakeholder per Project phase, including ongoing reporting to affected communities;

Plan	Project Phase*	Description
		- community Grievance Mechanism describing the process by which the stakeholders may raise concerns/complaints and seek resolution; - organisation Capacity and resources and responsibilities for implementing the stakeholder engagement activities; - evaluation and reporting methodology of Stakeholder Engagement Plan activities; - procedures for information disclosure, consultation and ongoing communication throughout construction and operation; - specific engagement requirements for affected landowners, land users, local communities, vulnerable groups and other stakeholders potentially affected by Project activities; - monitoring and reporting arrangements to assess the effectiveness of engagement activities, grievance management and stakeholder satisfaction, and to support continual improvement of stakeholder engagement processes.
Grievance Mechanism	C, O	The Community Grievance Mechanism, established as part of the Stakeholder Engagement Plan (SEP), describes the procedure for receiving, recording, assessing, resolving and closing grievances from communities and external stakeholders. The mechanism provides an accessible process through which affected stakeholders may raise concerns related to Project activities, impacts or performance and seek timely resolution. The Grievance Mechanism identifies the different stages of the process that each grievance follows: - grievance reception; - grievance acknowledgment; - grievance assesses and assign; - grievance investigation; - grievance resolution proposal; - grievance follows up and close-out. The mechanism will support implementation of commitments contained within the ESIA and associated management plans, including those relating to land access, livelihoods, community health and safety, traffic management, security arrangements and environmental performance. The Mechanism guarantees and allows for confidential and anonymous communications.

Plan	Project Phase*	Description
Workers Management Plan (Labour and Working conditions Management Plan) including Workforce Accommodation and Services Management Plan	C, O	In line with EBRD ESR2, the plan will be developed to address potential risks to worker rights and labour standards related to the construction phase by summarizing expectations and procedures to maintain quality working conditions and activities. The plan will describe the requirements and expectations in terms of EBRD ESR2 compliance, reporting, roles, supervision and training concerning labour and working conditions, including workforce accommodation. The document will include the following sections: legal requirements, roles and responsibilities, labour policies and procedures, risk assessment and impact mitigation related to labour management (tabular format), monitoring, reporting, and training and awareness. No Stakeholder engagement to get additional data, nor audit or interviews to workers is included in the scope of work. The plan will include workforce accommodation and services management to outline how the Project will provide safe, compliant, and adequate housing and related facilities for its workforce during the construction phase.
Workers Grievance Mechanism	C, O	The Workers Grievance Mechanism will describe the processes, roles and responsibilities for registering, investigating, resolving and remedying workers' grievances received. The Mechanism will guarantee and allow for confidential and anonymous communications.
Emergency Preparedness and Response Plan (EPRP)	C, O	The EPRP will outline the Project's procedures and responsibilities for responding effectively to emergency situations that could threaten people, property, the environment, or business operations. It will cover unexpected events likely to endanger the health of employees, visitors and/or contractors; threaten the environment; or create a risk for the integrity of the installations. The EPRP will define emergency preparedness, response arrangements, communication protocols, training, drills, coordination with external responders and incident investigation requirements. The Key Components of an EPRP are the following: • basic principles – general organisation, alert procedure, emergency organisation, liaison between different entities during a crisis, medevac procedure, media management, next of kin information, telephone calls management, and briefing and updates; • roles and responsibilities; • specific scenarios and emergency responses – fire/explosion, illness/casualty/death, road traffic incident, oil/chemical spill, earthquake, extreme weather events, BESS incidents and community-related emergencies; • forms for recording incidents; • management – training and exercises, update of the plan; • layout and data – charts, maps, layout of facilities, distances between facilities, MSDS; • resources – communication directory, internal emergency resources inventory, external emergency resources inventory; • consultation and coordination with relevant local fire and rescue service(s), prior to the commencement of construction works, to confirm BESS-specific emergency response arrangements and assess response capacity; any identified

Plan	Project Phase*	Description
		gaps or additional measures will be incorporated into the EPRP; • emergency drills and exercises to test preparedness, response capability and effectiveness of emergency arrangements; • incident investigation, corrective action and lessons learned processes to support continual improvement of emergency preparedness and response performance. Based on the currently available Project design information, the Project is not expected to be subject to Seveso III Directive (2012/18/EU) requirements; however, final applicability will be reviewed prior the preparation of this plan when detailed inventory and quantities of hazardous substances stored on site will be available and confirmed. The EPRP will be maintained as a controlled living document and shall be subject to regular review and revision by designated personnel to ensure continued suitability, effectiveness, and alignment with Project developments, identified risks, applicable requirements, and any Project substantial change.
Occupational Health and Safety Management Plan (OHSMP)	C, O	In line with EBRD ESR2 and local regulations, this plan will be developed to protect workers against adverse health and safety risks, providing measures and actions to be implemented to avoid or mitigate potential adverse OHS impacts that may arise from construction or maintenance activities, including work at height, lifting operations, electrical works, excavation, confined spaces, manual handling, PPE, training, hazardous materials management, permit-to-work systems, lone working, fatigue management, incident reporting and investigation, contractor management, emergency preparedness and response, and competency and training requirements for high-risk activities. This management plan will be enforced throughout the Project including all contractors and sub-contractors. It will include aspects such as regular training and monitoring. An effective Occupational Health and Safety Management Plan will support the Project and Contractors in: • avoiding or minimizing risk to and impacts on the occupational health and safety of employees and contractor's employees working in the project. • identifying, assessing and managing occupational health and safety hazards associated with Project construction and operation activities. • establishing safe systems of work, emergency preparedness arrangements, training requirements and contractor management procedures. • defining measures to manage occupational health and safety risks to employees and contractors' employees.
Community Health, Safety and Security Plan	C, O	This plan aims to outline potential impacts on the community including vulnerable groups and describe how these should be avoided, mitigated, managed and monitored. This plan will apply to all construction activities associated with the Project and seeks to ensure the safety and well-being of affected communities, workers,

Plan	Project Phase*	Description
		and other stakeholders. The Plan will be designed in alignment with EBRD ESR4 Health Impact Assessment is not included in this plan. The Plan will address risks associated with workforce presence and interaction with local communities, construction traffic and abnormal load transport, community exposure to active work areas, emergency situations, communicable diseases, security arrangements, inappropriate behaviour, gender-based violence and harassment (GBVH), and unauthorised access to Project facilities and infrastructure. The specific objectives of the Plan are the following: • to establish effective mechanisms for protecting the health and safety of nearby communities from any Project-related health risks; • to assign roles and responsibilities for all actions; • to define documentation and reporting procedures; • to determine timescales for implementation; and • to establish a schedule for periodic review and update of the plan. The plan will inform the Emergency Preparedness Response Plan with respect to viable scenarios in case of emergencies. Measures to protect communities from construction traffic, abnormal load transport, temporary access restrictions, site access risks, noise, dust, emergency situations, worker-community interaction, communicable diseases, security-related incidents, GBVH risks and public safety hazards associated with Project infrastructure. The Plan will define requirements for traffic management, security management, workforce conduct, community awareness, stakeholder engagement, incident reporting, corrective actions and monitoring throughout construction and operation. It outlines potential impacts and describes how these should be avoided, mitigated, managed and monitored.
Traffic Management Plan (TMP)	C	A Traffic Management Plan will be developed to set out the necessary requirements to be implemented by the Project to mitigate potential risks and/or avoid negative factors to the environment, workers, and adjacent community with regards to the traffic during the phases of construction and operation. The Plan will address Project-related traffic associated with workforce transport, delivery of materials and equipment, abnormal load transport, access road use, contractor vehicles and operational maintenance activities. It will include management measures for approved transport routes, delivery scheduling, abnormal load movements, traffic control measures, road safety and protection of road infrastructure. The document defines the necessary requirements that the project should implement to mitigate and/or avoid potential negative factors for the environment, workers, and adjacent community with regards to the traffic during the phases of construction and operations. Traffic Management Plan shall define management measures for the following aspects:

Plan	Project Phase*	Description
		• traffic management/journey management; • vehicle breakdown response; • vehicle and equipment maintenance and inspections programme; • hours of operation; • traffic accident contingency; • environmental management related to vehicles (noise, emissions); • protection, maintenance and reinstatement of road infrastructure affected by Project traffic; • communication of significant transport activities and traffic management measures to affected communities and stakeholders.
Land Access Management Plan / Corridor and Easement Management	C, O	The Land Access Management Plan / Corridor and Easement Management Plan will be developed to define the process for securing and managing land access, rights-of-way, easements, and temporary or permanent land use requirements. The plan will establish procedures for landowner engagement, compensation, grievance management, access agreements, restoration measures, and monitoring, in line with national regulations and international standards such as EBRD ESR5. The objective is to minimize and manage land access impacts while ensuring transparent and consistent stakeholder engagement and land-related decision-making during the construction phase. The Plan will: • manage temporary and long-term land access restrictions associated with Project activities and infrastructure; • manage easements, cable corridors and protection zones, including communication of land use restrictions and permitted activities; • define communication and engagement requirements with affected landowners and land users; • establish procedures for maintaining or providing alternative access arrangements where practicable; • define land reinstatement, compensation and commitment management requirements; • monitor land access issues, grievances and stakeholder feedback; • implement corrective measures and compensation where required.
Cultural Heritage Management Plan (CHMP) and Chance Find Procedure	C, O	The CHMP establishes the measures and procedures required to identify and protect cultural heritage resources, including archaeological, historical, and cultural features, and to avoid or minimise potential impacts during construction activities. The Plan also define requirements for implementation of the Project Chance Finds Procedure, management of unexpected discoveries, stakeholder engagement and reporting arrangements, and coordination with relevant authorities where cultural heritage resources may be affected by Project activities. The CHMP is based on international standards integrating requirements of EBRD ESR8. The main objectives of this Plan are to:

Plan	Project Phase*	Description
		• identify and document known cultural heritage resources within the area of interest, including archaeological and historical sites; • implement avoidance and protection measures to prevent damage or disturbance to cultural heritage during construction activities; • establish clear procedures, where necessary, for managing works in proximity to cultural heritage resources, including site demarcation and buffer zones; • ensure that all Project personnel are trained and aware of cultural heritage sensitivities and applicable procedures; • coordinate with relevant authorities and stakeholders, including local communities where appropriate, in the management of cultural heritage resources; • define monitoring, reporting and corrective action requirements to ensure compliance with cultural heritage commitments and applicable legal requirements; • establish procedures for consultation, grievance management and communication of cultural heritage issues through the Stakeholder Engagement Plan and Community Grievance Mechanism, where relevant • establishes and define the Chance Find Procedures with the measures and steps to be followed if archaeological, historical, cultural, or religious heritage items are unexpectedly discovered during ground-disturbing activities associated with the Project; the Procedure is designed to ensure that such discoveries are promptly identified, appropriately protected, and managed in compliance with applicable legal requirements, relevant authority expectations, and good international practice; the following are reported as key objectives of the procedure: ◦ establish clear steps for the identification and immediate protection of potential cultural heritage finds during construction activities; ◦ ensure that all works are halted in the vicinity of a discovery until appropriate assessment and authorisation are obtained; ◦ define roles, responsibilities, and communication channels for reporting discoveries to relevant authorities and specialists; ◦ facilitate appropriate evaluation, documentation, and management of chance finds in coordination with competent authorities and qualified experts; ◦ avoid or minimise impacts on previously unknown cultural heritage resources identified during construction.
Decommissioning Plan	D	The decommissioning plan will define high-level principles, requirements and approach for future decommissioning of Project assets at the end of their operational life. The Plan will outline the procedures for the safe dismantling and removal of infrastructure, management of demolition and decommissioning waste, reinstatement of affected areas, and post-decommissioning monitoring activities. The key objectives of this Plan are to:

Plan	Project Phase*	Description
		• define the principles and requirements for the safe and systematic decommissioning, dismantling, and removal of all Project infrastructure and assets; • minimise environmental and social impacts associated with decommissioning activities, including those related to waste generation and land disturbance; • ensure appropriate management, segregation, reuse, recycling, and disposal of decommissioning wastes in accordance with applicable regulations and good practice; • establish procedures for land reinstatement and restoration, aiming to return affected areas to their original or agreed condition; • identify and implement post-decommissioning monitoring measures to verify the effectiveness of reinstatement and ensure long-term site stability; • ensure that decommissioning planning is aligned with Project lifecycle considerations and updated as necessary to reflect evolving regulatory, technical, and environmental conditions.

C= Construction; O= Operation; D= Decommissioning.