
Environmental and Social Action Plan

Abbreviations

Abbreviations

AESR	Annual Environmental and Social Report
BAT	Best Available Techniques
BCE	Beo Čista Energija d.o.o.
CESMP	Construction Environmental and Social Management Plan
CWMP	Construction Waste Management Plan
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EP	Environmental Permit
EPC (Contractor)	Engineering, procurement, and construction (Contractor)
ESAP	Environmental and Social Action Plan
ESMS	Environmental and Social Management System
EU	European Union
IES	Independent Environmental and Social Consultant
IFC	International Finance Corporation
LTA	Lenders Technical Advisor
OHS	Occupational Health and Safety
OESMP	Operation Environmental and Social Management Plan
PR	Performance Requirements
PS	Performance Standards
PUC	Public Utility Company Gradska Čistoća
RAP	Resettlement Action Plan
SEP	Stakeholder Engagement Plan
SVO	SUEZ Vinča Operator d.o.o

The table below constitutes the ESAP. It identifies the required actions during pre-construction, construction and operation of the project. Implementation of the actions is the responsibility of Beo Čista Energija d.o.o. (BCE). When contractors perform work under contract, BCE will be responsible for those contractors' compliance with the requirements of the ESAP.

Item	Action	Environmental and Social Risks (Liability/Benefits)	Requirement (Legislative, IFC / EBRD PRs, Best Practice)	Resources, Investment Needs, Responsibility	Timetable action to be completed by end of year	Target and Evaluation Criteria for Successful Implementation	Status
PR1 Assessment and Management of Environmental and Social Impacts and Issues							
1.1	<p>Implement an Environmental and Social Management Systems (ESMS) in accordance with PR/PS1 and ISO14001:2015, ISO45001 or equivalent international recognized certification schemes to include: (a) an E&S and Occupational Health and Safety (OHS) policy aligned with PR/PSs; (b) procedures for screening, scoping, assessment and management of environment, OHS and social risks and impacts; (c) stakeholder mapping and consultation procedures including a community grievance mechanism; (d) organization structure; (e) roles and responsibility allocation; (f) procedures for environmental and OHS training of employees and contracted workers; (g) internal and external communication procedures; (i) emergency preparedness and response; (j) periodic monitoring of E&S and OHS performance; (k) periodic internal and external audit requirements; (l) procedures for management review and for change management; and (m) contractor management (n) security and (o) Register of EU and Serbian legislation, including relevant international regulations and relevant elements of EBRD and IFC Performance Requirements (PRs).</p> <p>The ESMS will include relevant procedures for the monitoring and management of the risks and impacts of the project associated facilities operations (hot water pipeline for heat offtake), with consideration of the company's leverage on the operator of such facilities.</p> <p>The company will ensure that the risks and mitigation measures specific to interim period that the company and the City work at the same time on landfill site (~1 year) are included in ESMS. –</p>	Having an efficient ESMS in place will help to minimize the environmental and social impact of SVO's activities	EBRD PR1 IFC PS1 Good International practice	Responsibility: SVO Staff resources and Certification cost	From Interim Service Commencement Date and throughout Contract Period	<p>Submission of ESMS and relevant documentation</p> <p>ESMS Audit Reports and Management reviews</p> <p>Annual EHS Report to the Lenders</p>	

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1.2	<p>The company will establish and implement a contractor management plan which include: (i) compliance requirements and checklist; (ii) criteria for the screening, qualification review and selection of contractors; (iii) reporting requirements, and (iv) monitoring and audit procedures.</p> <p>Review the wording of procedures and supplier contracts to ensure that EBRD /IFC (and this ESAP) requirements / standards are covered appropriately within the supply chain and contractors are managed appropriately.</p> <p>In preparing specifications for ESHS requirements, BCE should refer to:</p> <ul style="list-style-type: none"> • ESIA/ Framework ESMP • this ESAP • consent/permit conditions 	To assure that E&S considerations are extended through the supply chain and during construction.	EBRD PR1: IFC PS 1 Environmental and Social Appraisal and Management EBRD PR2: IFC PS2 Labour and Working Conditions	Responsibility: BCE Staff resources: suitably qualified procurement specialist addressing environmental, social, H&S.	Prior commencement of works on site to correspond with the legal / contractual terms	<p>Submission of ESMS and relevant documentation</p> <p>Revised procedures</p> <p>Where necessary revised model contracts for Works and Services to include EBRD /IFC (and this ESAP) requirements</p>	
1.3	The company will prepare procedures and instructions, including reporting requirements for the EPC and O&M contractors, site audits and periodic meetings with EPC and O&M contractors and their subcontractors.	Manage environmental and social issues during construction, and to ensure that mitigation proposed in ESIA is incorporated into the Project design and construction activities	EBRD PR1 IFC PS1 Good International Practice	Responsibility: BCE Staff resources:	Prior commencement of works on site to correspond with the legal / contractual terms Throughout the Works and Service Periods	Submission of ESMS and relevant documentation	
1.4	The company will appoint, at a minimum, a project E&S manager, an OHS manager and a community liaison officer. The company will provide full details of the organizational structure in place to manage compliance with E&S commitments on the Project, covering all project parties including numbers, positions, roles, responsibilities, and experience profiles of E&S staff.	Improved environmental and social performance and compliance. Compliance with national requirements	EBRD PR1 IFC PS1 Good International Practice	Responsibility: BCE Staff resources:	Prior commencement of works on site to correspond with the legal / contractual term Throughout the Works and Service Periods	Submission of organizational chart, job descriptions and CVs of appointed staff.	

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1.5	Ensure that the appointed Environment and Social Manager(s) has/have dedicated resources and budget to oversee BCE's ESMS, which includes identifying aspects associated with current activities and planned developments, developing environmental policy and procedures aligned with EBRD and IFC Performance Requirements, and this ESAP, managing the corporate entity and the portfolio in accordance with Good International Practice.	Having a dedicated Environmental and Social Manager and ensuring senior management are involved at the outset will ensure ESMS requirements filter through the company.	EBRD PR1 IFC PS1Good International Practice E&S governance practices	Responsibility: BCE Staff resources	Throughout the Works and Service Periods	Record of appointment and implementation of the tasks within action. Job description for Environment and Social Manager(s) setting out roles and responsibility and lines of reporting; appropriate decision making authority	
1.6	The Environmental and Social Manager should have reporting lines to senior management in BCE and input to board level decision making. BCE should also designate one person to monitor contractors' and subcontractors' performance in fulfilling the social aspects of their contractual requirements and, if necessary, undertake corrective measures, and to manage implementation of SEP, RAP, ESAP and HRMS accordingly.	Protection of brand and share value and increased commitment to transparency and good governance.	EBRD PR1 IFC PS1Good International Practice E&S governance practices	Responsibility: BCE Staff resources	Throughout the Works and Service Periods	Record of appointment and implementation of the tasks within action. Job description for Environment and Social Manager(s) setting out roles and responsibility and lines of reporting; appropriate decision making authority	
1.7	The company will require the EPC and O&M contractors to appoint their E&S team, including site safety supervisors and OHS officers	To assure that E&S considerations are extended through Project implementation		Responsibility: BCE, EPC Contractors and SVO (O&M Contractors)	Throughout the Works and Service Periods	Submission of organizational chart, job descriptions and CVs of appointed staff.	

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1.8	<p>Develop and implement a Construction Environmental and Social Management Plan (CESMP) to implement ESIA commitments, national and Lender requirements. The plan should reflect on the legal framework as well as reporting requirements, and also include provisions for regular training of staff. The CESMP should build upon the framework ESMPs and include:</p> <ul style="list-style-type: none"> • Organizational structure, roles and responsibilities for environmental, social and stakeholder management • Mitigation to address cumulative impacts of the proposed project. • ESIA commitments and how these will be delivered • Labour Management Plan • Waste management Plan • Pollution Prevention Plan • OHS Management Plan • Community Health and Safety Management Plan including measures related to traffic management, site access controls, removal of hazardous conditions on sites, community awareness raising measures, noise and odour control, and control of spreading of garbage and litter outside of the waste management site. • Design change management plan • Supply chain management plan • Habitat protection plan • Stakeholder Engagement Plan including the Grievance Mechanism • Environmental and social monitoring plan • Quality assurance program 	<p>Manage environmental and social issues during construction, and to ensure that mitigation proposed in ESIA is incorporated into the Project design and construction activities</p>	<p>EBRD PR1 IFC PS1 Good International Practice</p>	<p>EPC Contractors: own resources Supervising Engineer IES and BCE to review and approve.</p>	<p>CESMP to be developed on or prior commencement of works on site to correspond with the legal / contractual terms Workforce trained on CESMP before construction works start on site.</p> <p>CESMP to be implemented during pre-construction and construction phases.</p>	<p>Annual EHS Report to the Bank to reflect on the implementation of CESMP</p>	

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1.9	<p>The company will develop and implement an Operations Environmental and Social Management Plan (OESMP). Applicable main design provisions will be incorporated in the OESMP which will consist of plans and operational procedures for waste management, soil and groundwater contamination monitoring and management, leachate treatment, air emissions management, noise management, spill response management and hazardous material management, OHS management, emergency preparedness and response, traffic management, security personnel requirements, grievance mechanism for all workers on site and external stakeholder, information disclosure and stakeholder engagement, community health and safety, and environmental and social performance monitoring. The company will develop and implement an ambient air quality monitoring program, to quantify background conditions and to monitor air quality during operations with respect to all emission parameters of concern, as per the relevant WBG EHS Guidelines.</p> <p>Notwithstanding, the company will provide confirmation in the form of a performance guarantee from the technology/equipment provider that emissions to the atmosphere from the facility will comply with applicable performance standards, including the most stringent among Serbian air emission standards, European Union Directive 2010/75/EU on Industrial Facilities Emissions and relevant Annexes/Amendments, and WBG EHS Guidelines for Waste Management Facilities. The provision of a continuous emissions monitoring system (CEMS) is included in the project scope. CEMS will be installed to monitor the pollutants. As part of OESMP, the company will implement risk management strategies and measures to protect the community from physical, chemical, or other hazards associated with the operations phase. All measures will be described in Community Health and Safety plans.</p>	<p>Manage environmental and social issues during operation, and to ensure that mitigation proposed in ESIA is incorporated into the Project design and operation activities and that the Project is committed to apply the Best Available Techniques (BAT)</p>	<p>EBRD PR1, PR2, PR3, PR4, PR6, PR10 IFC PS1, PS2, PS3, PS4, PS6 Good International Practice Compliance with national legislation</p>	<p>Responsibility: SVO</p> <p>Potential CAPEX and OPEX associated with necessary steps to comply with new requirements and applicable performance standards</p>	<p>From Interim Service Commencement Date and throughout Contract Period</p>	<p>Submission of OESMP</p> <p>Submission of monitoring program</p> <p>Annual EHS Report to the Bank to reflect on the implementation of OESMP</p>	

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1.10	<p>The company will prepare An Emergency Preparedness and Response Plan (EPRP) which will include the following procedures: coordination with local authorities and emergency response agencies, first aid and emergency medical treatment, establishment and availability of emergency response team, emergency response actions, training, emergency response equipment, and emergency drills. The plan will address preparedness and response for both on-site and off-site emergencies and will include actions to assist and collaborate with the potentially Affected Communities and the local government agencies. The facilities will be equipped with fire and emergency alarm systems. Regular inspections of facilities and of the body of the existing dump site (before and after its closure) will be performed to ensure timely observation of and response to fires, spills or leakages. Explosion hazard zones and relevant mitigation measures will be identified. Management of accidental spillages and potential occurrences of surplus leachate production will be also included in the EPRP.</p>	<p>Safe working environment and improved HS performance Adequate emergency response</p>	<p>EBRD PR1 IFC PS1 EBRD PR4 IFC PS4 Good International practice</p>	<p>Responsibility: BCE Staff resources: suitably qualified</p>	<p>Prior commencement of works on site to correspond with the legal / contractual terms Throughout the Works and Service Periods</p>	<p>Submission of EPRP</p>	
1.11	<p>The company will ensure that EPC and O&M contractors to align with the company's EPRP and develop and implement specific procedures covering all emergencies; and will appoint suitably qualified emergency coordinator.</p>	<p>To assure that E&S considerations are extended through the supply chain and during construction.</p>	<p>EBRD PR1 IFC PS1 EBRD PR4 IFC PS4 Good International practice</p>	<p>Responsibility: BCE Staff resources: suitably qualified</p>	<p>Prior commencement of works on site to correspond with the legal / contractual terms Throughout the</p>	<p>Submission of relevant procedures and job description.</p>	

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1.12	<p>The full investment programme includes associated facilities and network connections to the public infrastructure including:</p> <ul style="list-style-type: none"> • The 35kV and 110 kV overhead lines (OHL) for connection of the facilities to the Transmission and Distribution System and • the hot water pipeline for heat offtake are related infrastructure necessary for the development of the Project <p>however, they are not part of the project being assessed in the ESIA report prepared by EGIS. The full investment programme or each of the associated facilities will require an assessment of environmental and social impacts of the infrastructure as per EU EIA Directives.</p>	<p>Potential adverse impacts of the associated facilities</p> <p>Compliance with EBRD PR and IFC PS</p>	<p>EBRD PR1 IFC PS1 Good International Practice</p>	<p>City of Belgrade With support of BCE Staff resources: suitably qualified specialist addressing environmental, social, H&S impacts.</p>	<p>Assessment of environmental and social impacts to be developed prior commencement of works on site to correspond with the legal / contractual terms.</p>	<p>Record of implementation of the tasks within action.</p>	

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PR2 Labour and Working Conditions							
2.1	The company will refine and adopt the human resources (HR) policy and procedures of Suez to ensure the coverage of, at a minimum, the following requirements: (i) non-discrimination, equal rights and equal pay; (ii) prevention of child labor and forced labor; (iii) freedom of association and right to collective bargaining; (iv) contractor management; (v) terms of employment including recruitment, hours of work, overtime arrangements and overtime compensation, rights to refuse overtime requests; (vi) commitment to apply zero tolerance for any proven case of gender based sexual or physical violence and workplace harassment; and (vii) a formal grievance mechanism. BCE will also ensure its HR policy is complied with PS2 and implemented by the EPC contractors and subcontractors.	National legislation and EBRD PR 2 ; IFC PS2 requirements regarding labour and working conditions not being met by SPV & O&M Contractor	EBRD PR2 IFC PS2 Labour and Working Conditions	BCE staff resources	End of 2019 Or at least before the start of the Interim Service Commencement Date	HR policy and procedures <ul style="list-style-type: none"> - Submission of workers code of conduct - Submission of content of induction training programs - Submission of induction training records - Submission of external and internal grievance mechanism forms and evidence that targeted people are informed on how to access 	
2.2	In case a workers accommodation is required on site the contractor is also expected to prepare the Workers Accommodation option plan in line with "Worker's accommodation: Process and Standards" Guidance note by IFC and EBRD, to ensure that the workers on site accommodation meet the requirements for health and safety, and personal wellbeing.	Labour and working conditions on site not meeting the requirements of the national legislation and EBRD PR2 IFC PS2	EBRD PR2: IFC PS2 Labour and Working Conditions	EPC Contractors	Before the start of construction works	Workers Accommodation option plan in place and approved by BCE	

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2.3	Prior to commencement of any workers on site activity at the existing landfill, the company will undertake a comprehensive risk assessment that takes in to account geotechnical, hydrogeologic conditions and subsurface waste characteristics (but not limited to) with the objective of identifying specific OHS risks at the existing site. Based on the findings of the review, the company will develop a site management plan and implement a work program that is responsive to the risks identified, including training of workers, provision of appropriate PPE and communication devices, emergency response plans including coordination with local government agencies for catastrophic site events.	Labour and working conditions on site not meeting the requirements of the national legislation and EBRD PR2 IFC PS2	EBRD PR2: IFC PS2 Labour and Working Conditions	EPC Contractors	Before the start of construction works	Submission of relevant documentation and evidences	
2.4	Security personnel Code of Conduct to be developed in line with PS2/PR2 requirements if any security personnel are employed on site as they would be the first line of contact with the local community.	Standard of practice and behaviour for the security personnel, guided by the principle of proportionality and GIP in terms of hiring, rules of conduct, training, equipping and monitoring of such personnel.	EBRD PR2: IFC PS2 Labour and Working Conditions Good International Practice National Legislation	EPC Contractors	Before the start of construction works	Security personnel Code of Conduct in place and approved by BCE	

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PR3 Resource Efficiency and Pollution Prevention and Control							
3.1	The company will establish a baseline assessment of groundwater quality upgradient and downgradient of the project site. The baseline studies will be continued during construction and will be used to develop the project environmental monitoring program during operations.	Risk of groundwater pollution due to the project activities. Benefits: Employment of best construction practices and compliance with national and international standards	EBRD PR3 IFC and Serbian Standards, BAT	Responsibility: BCE staff resources accredited laboratory cost	Before the start of construction works	Submission of relevant assessment studies	
3.2	The company will implement a sampling and monitoring program to validate (a) compliance with applicable discharge regulation and (b) no contamination of the sub-surface or groundwater attributable to sources within the project site. If monitoring shows material exceedance of applicable regulation from baseline conditions established upstream of the project site, the company will inform the relevant government authorities of the exceedance and if necessary take immediate remedial actions that are protective of human health and environment.	Risk of groundwater pollution due to the project activities. Benefits: Employment of best construction practices and compliance with national and international standards	EBRD PR3 IFC and Serbian Standards, BAT	Responsibility: BCE staff resources accredited laboratory cost	Before the start of construction works	Periodical submission of monitoring results	
3.3	Require from a EPC Contractors to include in CESMP (within the Pollution Prevention Plan) and implement the mitigation measures listed in the ESIA study for the air quality, surface, ground and waste water management, noise, soil, waste and hazardous waste management (including asbestos waste handling procedure). The CESMP also needs to include the monitoring provisions during the construction phase as defined in the ESIA study.	Risk of air, soil and/or water pollution due to the project activities. Benefits: Employment of best construction practices and compliance with national and international standards	EBRD PR3 IFC and Serbian Standards, BAT	EPC Contractors (resources and responsibility) IES Consultant (to monitor and report)	During the entire construction phase of the project	CESMP includes the mitigation measures for pollution protection from the construction activities together with the planned monitoring program prior to the start of construction works. Monitoring results reports	
3.4	Require from a SVO to include in OESMP and implement mitigation measures listed in the ESIA study for the air quality, surface, ground and waste	Risk of air, soil and/or water	EBRD PR3 IFC and Serbian Standards, BAT	SVO (responsibility and resources)	During the entire operational phase of the project	OESMP includes the mitigation measures for pollution abatement during the	

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	water management, noise, soil, waste and hazardous waste management (including asbestos waste handling procedure). The OESMP also needs to include the monitoring provisions during the operation phase as defined in the ESIA study.	pollution due to the project activities. Benefits: Employment of best construction practices and compliance with national and international standards				operational phase of the project together with the planned monitoring program prior to the start of the operation phase. Monitoring results reports	
3.5	The flue gas treatment performances to be potentially enhanced by adding extra quantities of reagents in case the monitoring results indicate the need for the stricter air pollution mitigation measures. The exact quantities of the reagents and triggering conditions to be evaluated by a specific study carried out after a full year of air quality monitoring.	Possibility of exceedance in PM ₁₀ , NO ₂ and Benzene emissions according to the Serbian, IFC and EU Air Quality Standards	EBRD PR3 IFC, Serbian and EU standards	BCE Staff resources: suitably qualified specialist addressing environmental, social, H&S impacts. O&M Operator (SVO) resources	After a full year of air quality monitoring.	Evidence that the specific study to evaluate the new quantities of reagents and triggering conditions is conducted needed for the enhancement of the flue gas treatment. Air quality monitoring report	
3.6	Review the requirements of the latest EU BREF document for waste incineration once it is finalised (final draft as of December 2018). Develop and implement a plan to ensure the project will operate in compliance with the revised BREF.	Regulatory compliance and improved air quality.	EU standards	TBD. Some additional capex and operating costs anticipated.	Plan to be developed within six month of the adoption of the revised BREF and implemented by the end of 2022	Plan developed. Air emissions in compliance with the requirements of the revised BREF.	

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PR4 Health and Safety							
4.1	<p>Implement Occupational Health and Safety Plan across SUEZ Vinča Operator d.o.o. (SVO) in accordance with ISO 18 001 or equivalent internationally recognized certification schemes.</p> <p>The company will prepare and implement an Occupational Health and Safety Management Plan (OHSMP) for both construction and operational phases The OHSMP will include detailed procedures for: hazard identification and risk assessment; job and task specific hazard analyses, provision and use of personal protective equipment (PPE); training; safe working procedures; prevention, reporting, recording, investigation, analysis of accidents and incidents, and follow up corrective actions; emergency response; provision of medical care, first aid and provision of medical treatment; workplace and health monitoring; measures for prevention of disease spread; fire prevention and fighting system; inspections and audits; performance reporting; and management review. The OHSMP will include procedures to manage OHS risks for the project operations and maintenance. The company will require the EPC and O&M contractors to develop their own OHSMPs to implement company's requirements</p>	<p>Having an efficient OHS Plan in place will help to minimize the health & safety impact on BCE Subcontractor's employees</p>	<p>EBRD PR4 IFC PS4 Good International practice</p>	<p>SVO for operation phase Staff resources and Certification cost BCE for construction phase</p>	<p>Prior commencement of works on site to correspond with the legal / contractual terms Throughout the Works and Service Periods</p>	<p>Construction and Operational OHS Plans and appropriately trained staff in place prior to operation</p> <p>Organizational structure in place to manage compliance with ISO 18 001 standards</p> <p>Internal and external Audit Reports and Management reviews</p>	

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4.2	<p>For the construction phase, BCE to require from EPC Contractors to develop an OHS and Fire and Explosion Management Plan as well as Asbestos Management Plan as part of the CESMP and ensure that the OHS measures defined in the Main Design for the construction phase are included in such plan. Ensure that CESMP includes operational plans for emergency interventions, as well as measures to prevent or minimize the potential for worker and community exposure to hazardous materials (as defined in the ESIA study and the Main Design). Monitor Contractor's compliance.</p>	<p>Safe working environment and improved HS performance of contractors</p> <ul style="list-style-type: none"> Adequate emergency response 	<p>EBRD PR4 IFC PS4</p> <p>Decree on Construction Site Organization,</p> <p>Mandatory Documentation on Construction Site and Construction Work Participants n</p>	<p>BCE to supervise, EPC Contractors to implement</p> <p>EPC Contractors' resources</p>	<p>Prior to start of construction works</p>	<p>Construction phase: CESMP developed prior to construction and includes an OHS and Fire and Explosion Management Plan, which contains all OHS measures defined in the Main Design for construction. Operational plans for emergency interventions, as well as measures to prevent or minimize the potential for worker and community exposure to hazardous materials included in CESMP. Formal contractor monitoring procedure implemented and audited to confirm compliance.</p>	
4.3	<p>For the operation phase, BCE to ensure that the OHS Study developed as part of the Main Design for the operation phase is included in the OESMP. Ensure that the OESMP includes measures to prevent or minimize the potential for worker and community exposure to hazardous materials (as defined in the ESIA study and the Main Design). Develop an emergency preparedness and response plan as part of the OESMP. The plan must include organizational structures, responsibilities, procedures, communication, training, resources and other aspects required to implement the plan.</p>	<p>Safe working environment and improved HS performance of EPC contractors</p> <p>Adequate emergency response</p>	<p>EBRD PR4 IFC PS4</p>	<p>BCE / SVO</p> <p>In-house or external consultant support</p>	<p>Prior to start of operation</p>	<p>Operation phase: OESMP includes OHS Study developed as part of the Main Design, as well as measures to prevent or minimize the potential for worker and community exposure to hazardous materials Documented Emergency Preparedness and Response Plan Included in AESR to EBRD / IFC</p>	

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4.4	BCE will coordinate measures with PUC and the City for health and safety of waste pickers and their households by allowing only registered adults on the site, excluding children and domestic animals, ensuring that personal protective equipment, such as safety shoes, face masks, and protective gloves are provided; a worker health surveillance program, including regular vaccination and health examinations are executed; by arranging the disposal layout and providing sorting facilities to improve access to recyclables while reducing their contact with other operations to minimize potential hazards; providing water supply for washing, toilets and areas for changing clothes; implementing trainings and campaigns regarding hygiene, and care of domestic animals.	Safe working environment and improved HS within Project Area Minimise Health and Safety risks Reduce injuries	EBRD PR4 IFC PS4	Responsibility: BCE to coordinate with PUC and the City	From Interim Service Commencement Date and throughout Contract Period	Submission of relevant documented evidences	
4.5	The company will ensure that the consultant experts will carry out independent review of the construction and will periodically monitor the structural safety of the retaining structure post-construction.	H&S considerations incorporated into the design and construction, of the structural elements in accordance with GIP, taking into consideration safety risks to third parties and affected communities.	EBRD PR4 IFC PS4 Good International Practice	Responsibility: BCE to coordinate with PUC and the City LTA to carry out independent review	During the entire construction phase of the project	Submission of review	

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PR5	Land Acquisition, Involuntary Resettlement and Economic Displacement						
5.1	The company will ensure the construction and O&M contractors will include in their workforce hiring plans mechanisms for maximizing the employment of waste pickers where feasible based on workforce needs and skills required.	Waste pickers able to benefit equally from employment opportunities and benefits	EBRD PR5 IFC PS 5	BCE to coordinate with PUC, the City, EPC Contractors and SVO	From Interim Service Commencement Date and throughout Contract Period	Submission of EPC contractor's and SVOs employment plan including waste pickers.	
5.2	Implement RAP including all measures for the relocation of households currently living on the landfill, as well as measures to restore livelihoods of the waste pickers currently working on the landfill	Failure to relocate the families to suitable accommodation could deter implementation of construction works and/or leave these families without proper Loss of income for waste pickers due to limited employment options as a result	EBRD PR5: Land Acquisition, Involuntary Resettlement and Economic Displacement Good International Practice	City of Belgrade City of Sabac Ministry of Labour, Employment, Veteran and Social Affairs, and Ministry for Public Administration and Local Self Governance	Resettlement of families to be completed before the start of construction Activities to support livelihood restoration activities for waste pickers to be implemented before access to existing landfill is granted to BCE Contractors	Submission of RAP completion audit report proving that: i) All 17 households relocated from the landfill; and ii) Measures identified in the RAP were implemented successfully to restore the livelihoods of waste pickers.	
5.3	Appoint an independent external consultant to conduct periodic evaluation of the resettlement process along with a completion audit at the end of the process to verify the effectiveness of the implemented measures. Indicators for the evaluation should cover both outputs number of processed cases, compensation received, grievances processed and similar) and outcomes participation in the consultation process, impact of compensation on households and living arrangements, ability/success in restoring livelihood incomes following expropriation, etc.)	Failure to assess the full scale of displacement impacts the waste pickers will be exposed to from the project could increase the number of received grievances, slow down the resettlement process and create tensions with the local community prior to start of	EBRD PR5: Land Acquisition, Involuntary Resettlement and Economic Displacement Good International Practice	BCE IES Consultant (to monitor and report)	Before the start of construction	Terms of Reference agreed with the Lenders EBRD/IFC to have non-objection rights on selection of the consultant Independent consultant service contract awarded	

Item	Action	Environmental and Social Risks (Liability/Benefits)	Requirement (Legislative, IFC / EBRD PRs, Best Practice)	Resources, Investment Needs, Responsibility	Timetable action to be completed by end of year	Target and Evaluation Criteria for Successful Implementation	Status
PR6 Biodiversity and Living Natural Resources							
6.1	Selection of plant species for the green belt to be limited only to autochthonous species in order to preserve the domestic gene pool. Individuals of protected species midland hawthorn (<i>Crataegus laevigata</i> (Poir.) DC.) and common hawthorn (<i>Crataegus monogyna</i> Jacq.) are to be used in greenbelt formation.	Compliance with national and EBRD requirements	EBRD PR 6 IFC PS3 Detailed Plan of Regulation and Local Conditions	BCE to supervise, EPC Contractors to implement EPC Contractor's resources	During design stage and for the period of the green belt implementation Works Method Statement prior Construction Works on site	Selection of autochthonous species at design and procurement stages Included in AESR to EBRD / IFC	
6.2	For planting grassland at old landfill site (after its closure) a mixture of seeds of grasses, and other locally present plants (such as trefoil (<i>Trifolium</i> spp.), burclover (<i>Medicago</i> spp.)) should be used.	Local and permanent conversion of currently present habitats.	EBRD PR 6 IFC PS3 Detailed Plan of Regulation and Local Conditions	BCE to supervise, O&M Contractor, SVO to implement SVO resources	Along with landfill cells closure and capping	Previously selected species providing satisfaction Included in AESR to EBRD / IFC	
6.3	Individuals of protected species true comfrey (<i>Symphytum officinale</i> L.) and littleleaf linden (<i>Tilia cordata</i> Mill.), should be relocated to a suitable location or individuals of these species (from greeneries) can be used in area landscaping.	Removal of protected plant species	EBRD PR 6 IFC PS3 Detailed Plan of Regulation and Local Conditions	BCE to supervise, EPC Contractors to implement EPC Contractor's resources	Works Method Statement prior Construction Works on site	Included in AESR to EBRD / IFC	
6.4	During execution of works, in the case of encountering strictly protected species, all necessary protective measures have to be taken. Relevant authorities (Institute for Nature Conservation of Serbia) have to be informed and actions taken according to their instructions.	Encountering of other protected flora and fauna species.	EBRD PR 6 IFC PS3 Detailed Plan of Regulation and Local Conditions	BCE to supervise, EPC Contractors to implement	Works Method Statement prior Construction Works on site	Included in AESR to EBRD / IFC	
6.5	Works of removing natural vegetation within the planned project area should be performed from the beginning of September to the end of February to protect locally nesting bird fauna. If vegetation removal has to be done in this period, it will be done under constant supervision of an ecologist (ornithologist) to ensure that, if necessary, appropriate steps will be taken.	Nestlings fatalities due to the destructions of nests during construction.	EBRD PR 6 IFC PS3	BCE, with support of a specialized ecologist	Before the start of construction works on site	Independent consultant service contract awarded	

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PR8 Cultural Heritage							
8.1	Ensure that EPC Contractors develop and implements a Chance Find Procedure. This will include notification of Institute for Culture Monuments Protection of found objects, alerting project personnel to the possibility of chance finds being discovered and preventing any disturbance or destruction pursuant to the Law on Cultural Heritage (Official Gazette of Republic of Serbia, No. 71/94). EPC Contractors to implement mitigation measures identified.	To ensure that impacts on Cultural Heritage assets are identified and mitigated	EBRD PR8 IFC PS7 EU EIA Directive National Regulation	BCE to oversee. EPC Contractors to develop with the support of a suitably qualified cultural heritage consultant	Prior to commencement of construction For the duration of the construction	Documented procedure BCE to report on updates to EBRD/IFC in AESR.	
8.2	Ensure that requirement for Archaeological Monitoring during construction is included in the Procurement Plan for the Project and that suitably qualified Archaeology Service Agency is contracted prior to any works on site. BCE is required to maintain watching brief during works, with clear procedures for protection and documentation (late finds protocol) incorporated into EPC Contractors procedures	Preservation on cultural heritage and minimizing risks to archaeological remains.	EBRD PR 8 IFC PS 7 EU EIA Directive National Regulation	BCE / Institute for Protection of Cultural Heritage Budget allocation	Prior to commencement of construction for the duration of excavations and foundations works	Documented procedure: • Archaeological Monitoring in place • Watching brief during works, incorporated into construction contracts BCE to report on updates to EBRD/IFC in AESR.	

Item	Action	Environmental and Social Risks (Liability/Benefits)	Requirement (Legislative, IFC / EBRD PRs, Best Practice)	Resources, Investment Needs, Responsibility	Timetable action to be completed by end of year	Target and Evaluation Criteria for Successful Implementation	Status
PR10 Information Disclosure and Stakeholder Engagement							
10.1	Implement the Stakeholder Engagement Plan, including the Grievance Management Procedure. Oversee contractor management of grievances as outlined in the SEP to ensure conformance.	Ensure that people are informed and consulted about environmental and social issues related to the Project and that grievances are addressed in a transparent and timely manner. Timely information to citizens will enable them to plan and will reduce tensions and grievances in the affected communities	EBRD PR10 IFC PS 1 Information Disclosure and Stakeholder Engagement	BCE Costs associated with printing of any notification material (leaflets, posters)	Ongoing throughout project implementation	Update BCE's website Publish SEP, ESAP and NTS Stakeholders informed and consulted about the Project Project leaflets developed and distributed SEP and Grievance Management regularly reported in AESR report to EBRD/ IFC	