

BAJGORA WIND POWER PROJECT. KOSOVO
ENVIRONMENTAL AND SOCIAL ACTION PLAN (DRAFT FOR DISCLOSURE)

Abbreviations:

BAP: Biodiversity Action Plan
 CH: Critical Habitat
 EBRD: European Bank for Reconstruction and Development
 E&S: Environmental & Social
 ESIA: Environmental and Social Impact Assessment
 CESMP: Construction Environmental & Social Management Plan
 ESMS: Environmental & Social Management System
 GIP: Good International Practice
 HR: Human Resources
 LALR: Land Acquisition and Livelihood Restoration
 OHTL: Overhead Transmission Line
 PBF: Priority Biodiversity Feature
 PR: Performance Requirements (as defined by EBRD in its 2014 Environmental and Social Policy)
 PS: Performance Standards (as defined by IFC in its 2012 Sustainability Framework)
 SEP: Stakeholder Engagement Plan

No.	Action	E&S Risks (Liability/Benefits)	Requirement	Responsibility	Timetable	Target and Implementation Criteria
PR1.1	E&S Manager Appoint a suitably qualified and experienced Enlight / Sowi Kosovo E&S Manager for the early works, main construction and operation phases, responsible for Project ¹ compliance with national legislation and EBRD/IFC E&S requirements, and in charge of organizing the implementation of the ESIA and ESAP actions. The E&S Manager will directly report to the Enlight / Sowi Kosovo Project Manager.	E&S risk management and capacity	PR1 / PS1	Enlight / Sowi Kosovo	Prior to financial close	Responsibility assigned. Name and contact of the responsible person provided to the Lenders.

¹ The Project refers to the development and operation of the Bajgora wind power project including the overhead transmission line to be constructed for the wind farm.
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<p>PR1.2</p>	<p>E&S Management: early works</p> <p>Implement, and where relevant update, the Early Works CESMP. The Early Works CESMP will include (i) a description of the early works activities and contract arrangements, (ii) a register of all environmental, social and health & safety risk for the early works period, and corresponding mitigation measures to meet EBRD PRs and IFC PSs following the mitigation hierarchy (including avoidance of impacts on PBF/CH species), and (iii) a mechanism for the effective enforcement and monitoring of the CESMP implementation across the chain of the contractors and subcontractors involved in early works.</p> <p>Monthly reporting to Project lenders on the Early Works CESMP implementation (this is separate to ESAP Action 1.9)</p>	<p>Corrective action to ensure compliance of early works with PRs and PSs</p>	<p>PR1 / PS1</p>	<p>Enlight / Sowi Kosovo E&S manager, with support from a consultant</p>	<p>Early works CESMP in place before financial close. Implemented during Earl Works.</p>	<p>EW-CESMP in place, implemented and monitored. Early works compliant with PRs and PSs. Monthly monitoring report provided to the Project lenders.</p>
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PR1.3	<p>ESMS: main works</p> <p>Establish an ESMS for the implementation of the main construction activities. The ESMS shall include procedures for change or non-compliances management and an E&S monitoring mechanism.</p> <p>The ESMS will define roles and responsibilities and the allocation of E&S commitments and actions (i.e. between the Enlight /Sowi Kosovo team and contractors).</p>	E&S management system	PR1 / PS1 GIP	Enlight / Sowi Kosovo E&S manager, with support from a consultant	ESMS prepared before the first disbursement ESMS implemented throughout construction and commissioning.	ESMS established and implemented.

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PR1.4	<p>ESMS: operational phase</p> <p>Develop and implement an ESMS (structured according to ISO9001 – 14001 standards) for the operational phase of the Project. The ESMS shall include an E&S policy, public and occupational H&S procedures, procedures for change or non-compliances management and an E&S monitoring mechanism.</p> <p>The ESMS will define roles and responsibilities and the allocation of E&S commitments and actions (i.e. between the Enlight /Sowi Kosovo team and any contractors).</p>	E&S management system	PR1 / PS1 GIP	Enlight / Sowi Kosovo E&S manager, with support from a consultant	Preparation: before operation Implementation: during operation	ESMS established and implemented.
PR1.5	<p>ESMP finalisation and integration</p> <p>Further develop, and integrate into the respective ESMS, the ESMPs disclosed as part of the ESIA. This will include refinement and further development of the mitigation and management measures, roles and responsibilities, targets, limits and thresholds as well as monitoring and reporting provisions into procedures, plans and/or instructions such that they can be implemented and effectively monitored.</p>	E&S impact and performance management	PR1 / PS1	Enlight / Sowi Kosovo	Prior to construction commencing with respect to construction phase ESMP requirements Prior to operations commencing with respect to operational phase ESMP requirements	ESMPs fully integrated into ESMS for construction and operation
PR1.6	<p>E&S performance for the construction period</p> <p>Include in each contractor's binding documentation a general obligation (i) to meet EBRD PRs and IFC PSs, and (ii) to implement corrective actions required by the Project Lenders in relation to compliance with EBRD PRs and IFC PSs.</p> <p>Include in each contractor's binding documentation a specific obligation to implement the E&S actions identified in the Project's E&S documentation. Attach this E&S documentation (EIAs, ESIA, ESMPs, etc.) to each contractor's contract.</p>	Contractor E&S performance management	Kosovo law PR1 / PS1	Enlight / Sowi Kosovo	Before contract signature with contractors.	Contractor's obligations as per Project E&S documentation included in contractor binding agreements.

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PR1.7	<p>Contractors HSEMP and management system</p> <p>Request contractually, review, approve and monitor the effective implementation of a specific Health, Safety and Environment Management Plan (HSEMP) prepared by each contractor in order to meets its contractual E&S obligations and tailored to its activities.</p> <p>Request contractually each contractor to have a management system/plan in place to ensure the effective implementation of the HSEMPs.</p>	Compliance with applicable requirements	Kosovo law PR1 / PS1	Enlight / Sowi Kosovo	Prior to construction and maintenance / rehabilitation works	HSEMP prepared and implemented by contractors, approved and monitored by Enlight / Sowi Kosovo E&S manager
PR1.8	<p>E&S responsibility assigned by Contractors</p> <p>Request contractually each contractor to appoint a suitably qualified and experienced E&S Officer, with the responsibility to organize the implementation of the E&S actions that fall under the contractor's responsibility as per their respective contract.</p>	Compliance of construction activities; effective implementation of the E&S actions under the responsibility of contractors.	Kosovo law PR1 / PS1	Each contractor, on Enlight / Sowi Kosovo request	Before starting on-site activities.	Contractor's E&S obligations are met. E&S officer in contact with the E&S manager as per the Project's ESMS.
PR1.9	<p>Regular reporting to lenders</p> <p>E&S Monitoring reports to Project Lenders and guarantor. The standard EBRD E&S reporting template can be used and adjusted to meet this requirement. This reporting may also be conducted by the Lenders E&S monitoring consultant.</p>	Regular Lenders monitoring process	PR1 / PS1	Enlight / Sowi Kosovo E&S manager	Every four months during construction and every year during operation	Reports issued and acceptable to the Lenders
PR1.10	<p>Code of conduct</p> <p>Provide (and request all contractors to provide) workers with a code of conduct, and an induction training on local customs and behaviours to be avoided, including awareness raising on sexually transmissible diseases and prevalence rates in Kosovo.</p>	Prevention of issues or conflict caused by intentional or unintentional behaviours	PR1 / PS1	Enlight / Sowi Kosovo E&S manager	Code of conduct and induction material ready before first disbursement. Training and induction of all new workers across construction and operation.	Code of conduct and induction material prepared and updated when necessary. Training and induction of all new workers.
PR1.11	<p>Land entry procedure</p> <p>Prepare, communicate to all contractors and enforce contractually the implementation of a land entry procedure before entering new work areas. The procedure shall include a delineation of (i) sensitive environmental features to be preserved, (ii) delineation of areas that have not been acquired / leased by the Project and should not be entered, and (iii) specific public and worker H&S measures (eg asbestos) applicable to the work site.</p>	Prevention of environmental and social damage from inconsiderate land use.	PR1 / PS1	Enlight / Sowi Kosovo and contractors	Procedure in place prior to fist disbursement	Procedure in place and implemented. No works undertaken outside authorised areas.

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PR2.1	HR policy and procedures HR policy aligned with EBRD/IFC requirements to be prepared, disclosed to workers, and shared with contractors with a contractual obligation to apply the policy at the contractor level and to subcontractors (during both the construction and operation phases). The policy shall forbid the employment of staff below 18 years of age in the context of the Project.	Improved human resources practices and compliance with national legislation and PR2 / PS 2 requirements	PR2 / PS2 ILO standards National legislation	Enlight / Sowi Kosovo	Policy prepared before first disbursement Implementation throughout construction and operation	HR Policy and Procedures prepared and abide by contractors
PR2.2	Illegal / informal employment Conduct monthly unannounced and random HR audits of contractors and subcontractors to identify any form of illegal employment (child labour, no work contracts, non-compliance with HR requirements under ESAP action PR2.1).	Avoidance of illegal / informal employment	National legislation	Enlight / Sowi Kosovo	Construction (early works and main works) and commissioning period	HR audits conducted, results included in reports to lenders, and non-compliant contractors evicted after first notice.
PR2.3	Workers grievance mechanism Prepare and implement a grievance mechanism accessible to all workers (directly or indirectly employed to work on the Project).	Worker grievance management	PR2 / PS2	Enlight / Sowi Kosovo E&S manager	Mechanism prepared for early works Implementation throughout construction and operation	Grievance mechanism in place. Workers informed at induction stage.
PR2.4	Security personnel Security personnel hired for the construction or operation periods must be subject to a training based on the UN Voluntary Principles on Security and Human Rights.	Mitigation of risks related to non-employee security personnel	PR2 / PS2	Enlight / Sowi Kosovo E&S manager	Training provided prior to commencement of services (i.e. at induction)	Security personnel trained at the induction stage.
PR3.1	Erosion control and reinstatement plan Prepare and implement an erosion control plan, including a comprehensive set of measures to manage earthworks, temporary sites, top soil and reinstatement works in a way that avoids or minimize the risk of uncontrolled erosion or sediments dispersion. Implement the plan directly or through contractors. The reinstatement of impacted areas is to be maximised and the project footprint kept to a minimum (e.g. turbine platforms).	Prevention of uncontrolled sediments transport and erosion processes.	PR3/PS3	Enlight / Sowi Kosovo E&S manager	Plan prepared and implemented for construction starting from early works. Plan updated for the operation phase operation.	Erosion controlled; temporary sites reinstated.
PR3.2	Turbine oil spills To avoid any pollution caused by lubricants leaks, design the production units so that any unexpected lubricant leak is collected and retained, or use biodegradable / non-toxic lubricants.	Prevention of uncontrolled oil leaks to the environment during operation.	PR3/PS3	Turbine supplier	Design stage.	Toxic / polluting oil leaks avoided.

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PR3.3	Disturbances to public facilities Identify sensitive public building (hospitals and health facilities, schools, cult and religious sites, police, defence) located in the vicinity of the OHTL worksites, and consult them on the disturbance minimization measures put in place to control noise, dust and traffic.	Prevention of disproportionate disturbance.	PR3/PS3	Enlight / Sowi Kosovo E&S manager	Prior to OHTL works.	Public building managers consulted, and disturbance minimization actions agreed.
PR3.4	Pesticides ban Ban the use of herbicides during the construction and operation period. Mechanical removal of plants only is authorized.	Avoidance of unnecessary pollutants dispersion.	PR3/PS3	Enlight / Sowi Kosovo E&S manager	Early works, main works and operation phase.	No pesticides used.
PR3.5	Flicker effect avoidance Apply turbine shutdown during operation to avoid flicker effect on sensitive receptors as identified in the flicker impact assessment.	Avoidance of flicker effect on neighbouring communities.	PR3/PS3	Enlight / Sowi Kosovo Turbine supplier	Incorporated into design and operations system	Shutdown mechanism included in design and operation system. Flicker effect related impacts avoided.
PR3.6	Asbestos Implement the Asbestos Management Plan	Asbestos risk control	PR3/PS3	Enlight / Sowi Kosovo through specialized contractors	Early works, main works and operation phase.	Plan implemented. Asbestos risk controlled.
PR4.1	Workers accommodation Accommodate (and require contractors to accommodate) workers in line with the objectives of the IFC/EBRD workers' accommodation guidance note.	Healthy and safe accommodation of workers	PR4/PS2	Enlight / Sowi Kosovo Contractors	Early works and main works	Workers accommodation monitored monthly by Enlight / Sowi Kosovo E&S Manager
PR4.2	Use of explosives If the use of explosives is planned, prepare a specific E&S risk assessment in liaison with the authorized contractor for blast-works and with the Project's E&S experts, with a focus on biodiversity, water springs and social receptors.	Explosives risks management	PR4/PS4 PR6/PS6	Enlight / Sowi Kosovo E&S manager	Before using explosives	Specific E&S risks assessment conducted and mitigation measures adopted and implemented.
PR4.3	Emergency Preparedness and Response Prepare and implement Emergency Preparedness and Response Plans for the construction and operational phases of the Project.	Anticipation of emergency situations.	PR4/PS2&4	Enlight / Sowi Kosovo	Starting from early works for the construction period Update for the operational phase.	Plans prepared, reviewed annually and updated when necessary.

No.	Action	E&S Risks (Liability/Benefits)	Requirement	Responsibility	Timetable	Target and Implementation Criteria
PR5.1	<p>Land Acquisition and Livelihood Restoration (LALR) plan Develop the LALR Framework into a LALR plan. Implement the LALR plan and organize internal and independent monitoring, including:</p> <ul style="list-style-type: none"> • detailed records of all aspects of compensation entitlements and payments • Database with details of all project affected persons, their compensation entitlements, status of payment, inclusion in livelihood restoration programs, assistance received or jobs. • LALR related complaints and their resolution. 	Ensure appropriate compensation is paid to project affected persons and that the LALR Plan achieves its objectives to enhance, or at least restore, the livelihoods of all affected persons in real terms relative to pre-project levels.	PR5/PS5 Kosovo legislation	Enlight / Sowi Kosovo	<p>LALR plan finalized prior to first disbursement</p> <p>Monthly internal reporting during LALR plan implementation.</p> <p>External monitoring reports and reporting to Lenders' every 6 months during LALR implementation.</p>	<p>LALR plan satisfactory to the Lenders.</p> <p>LALR plan implemented</p> <p>Progress update to Lenders' with reporting on targets (targets to be validated with Lenders).</p>
PR5.2	<p>LALR completion audit Undertake completion audit for all land acquisition and compensation activities</p>	Ensure appropriate compensation is paid to project affected persons and that the LALR plan achieves its objectives to enhance, or at least restore, the livelihoods of all affected persons in real terms relative to pre-project levels.	PR5/PS5	Enlight / Sowi Kosovo	Upon completion of land acquisition and compensation or at least 2 years after completion of LALR.	<p>Audit signed off by Lenders'</p> <p>Number of resettlement related complaints and their resolution status.</p>
PR6.1	<p>Biodiversity Management Plan (BMP) Implement the BMP, and organize internal and independent monitoring, including for:</p> <ul style="list-style-type: none"> • Natural habitats converted to modified habitats • Effective implementation of no net loss / net gain actions for PBF / CH species. • Corrective actions definition and implementation where success criteria are not met (eg biodiversity offsets, etc.) <p>ESAP Action 6.3 is directly related to this action.</p>	Ensure biodiversity mitigation measures are effectively implemented.	PR6/PS6 Kosovo legislation	Enlight / Sowi Kosovo	<p>As per the BMP and Project schedule.</p> <p>Continued implementation of mitigation, management and monitoring measures will be informed by monitoring and in agreement with the Lenders.</p>	<p>BMP implemented and objectives met.</p> <p>Progress reported to the Lenders</p> <p>Any corrective actions agreed with the Lenders</p>

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PR6.2	Biodiversity and environment protection Include (and request contractors to include) in the workers induction training an awareness raising training about wildlife conservation in the Project area, and pollution control.	Biodiversity and environment protection	PR6/PS6 Kosovo legislation	Enlight / Sowi Kosovo	During construction period. Workers trained during their induction training.	Workers trained
PR6.3	Bird and Bat monitoring (Operations) Develop an appropriate bird and bat monitoring programme for the wind power project, including visual observations and carcass surveys and in line with GIP. Commence implementation during 2020 (bird and bat observations/surveys) and implement the full programme for a minimum of two years during operations. The programme should include an adaptive management component and inform the need for additional or modified mitigation measures to avoid and/or reduce, or at a last resort offset/compensate for, impacts to birds and bats. Appropriate reports will be prepared on an annual basis and included in the annual reports to the Lenders as per ESAP Action 1.9 Implementation post the first two years of operation will be informed by the outcomes of programme implementation and in agreement with the Lenders.	Bird and bat monitoring	PR6/PS6 GIP	Enlight / Sowi Kosovo With specialist support	Programme developed prior to first disbursement Programme implemented during construction and operations	Programme in place and satisfactory to the Lenders. Outcomes of monitoring included in annual report to the Lenders Implementation beyond two years of operations agreed with Lenders.
PR6.4	Update the assessment of impacts to biodiversity, specifically with respect bird and bat collision risk, to reflect field data gathered during October 2019. Where necessary update the mitigation and management measures. This update will be disclosed as an update to the ESIA prior to consideration of the Project by EBRD's Board of Directors.	Bird and bat impact assessment	PR6/PS6 GIP	Enlight / Sowi Kosovo With specialist support	Prior to consideration of the Project by EBRD's Board of Directors.	Updated biodiversity assessment accepted by Lenders and disclosed.
PR8.1	Chance finds Prepare a chance find procedure for contractors involved in the Project and include requirement to implement it in tender documents and works contracts. Train (and request contractors to train) workers on the nature of potential chance finds, and the way to manage them.	Minimize risk of impacts on cultural heritage	PR8/PS8	Enlight / Sowi Kosovo	Prior to construction activities	Procedure prepared. Contractors required to implement Workers trained and training records held.

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PR10.1	Stakeholder Engagement Plan Implement the Stakeholder Engagement Plan (SEP). Review at least annually and update when necessary. Key information to be communicated in English, Albanian and Serbian languages.	Ensure effective stakeholder engagement and maintain good community relations	PR10/PS1	Enlight / Sowi Kosovo E&S manager	Prior to disclosure period, continued during construction and operation.	SEP implemented, regularly updated.
PR10.2	Community grievance mechanism Establish and maintain an effective community grievance mechanism	Ensure effective stakeholder engagement and maintain good community relations	PR10/PS1	Enlight / Sowi Kosovo	Starting from early works, continued during construction and operation.	Grievance mechanism prepared, put in place and communicated to affected communities. Grievance record maintained, and grievances timely managed.
PR10.3	OHTL social impacts Undertake meaningful consultation of stakeholders along the OHTL route, not limited to those impacted by land acquisition. Inform stakeholders about the OHTL route, its construction planning and arrangements and future rights limitations (land ownership, right of ways, OHTL maintenance, etc.). Seek and document solutions or alternatives where stakeholders raise legitimate concerns. Register concerns deemed illegitimate and the answers that were provided.	Minimization of social risks along the OHTL	PR5/PS5	Enlight / Sowi Kosovo	When finalizing the OHTL route.	Stakeholders engaged by the project. Register of all concerns raised, and solutions / alternatives.
PR10.4	Environmental information sharing Disclose and maintain access to environmental and social documents of interest to the public throughout the Project lifecycle. ESIA disclosure package and other relevant documents available on the Enlight / Sowi Kosovo and Lender website (s).	Ensure effective stakeholder engagement and maintain good community relations	Good practice	Enlight / Sowi Kosovo	During operation	Environmental and social information shared with the public.