

Bajgora Wind Project

*Environmental and Social Management System (ESMS) Manual
including Organizational Structure*

Submitted to:

SOWI Kosovo

Submitted by:

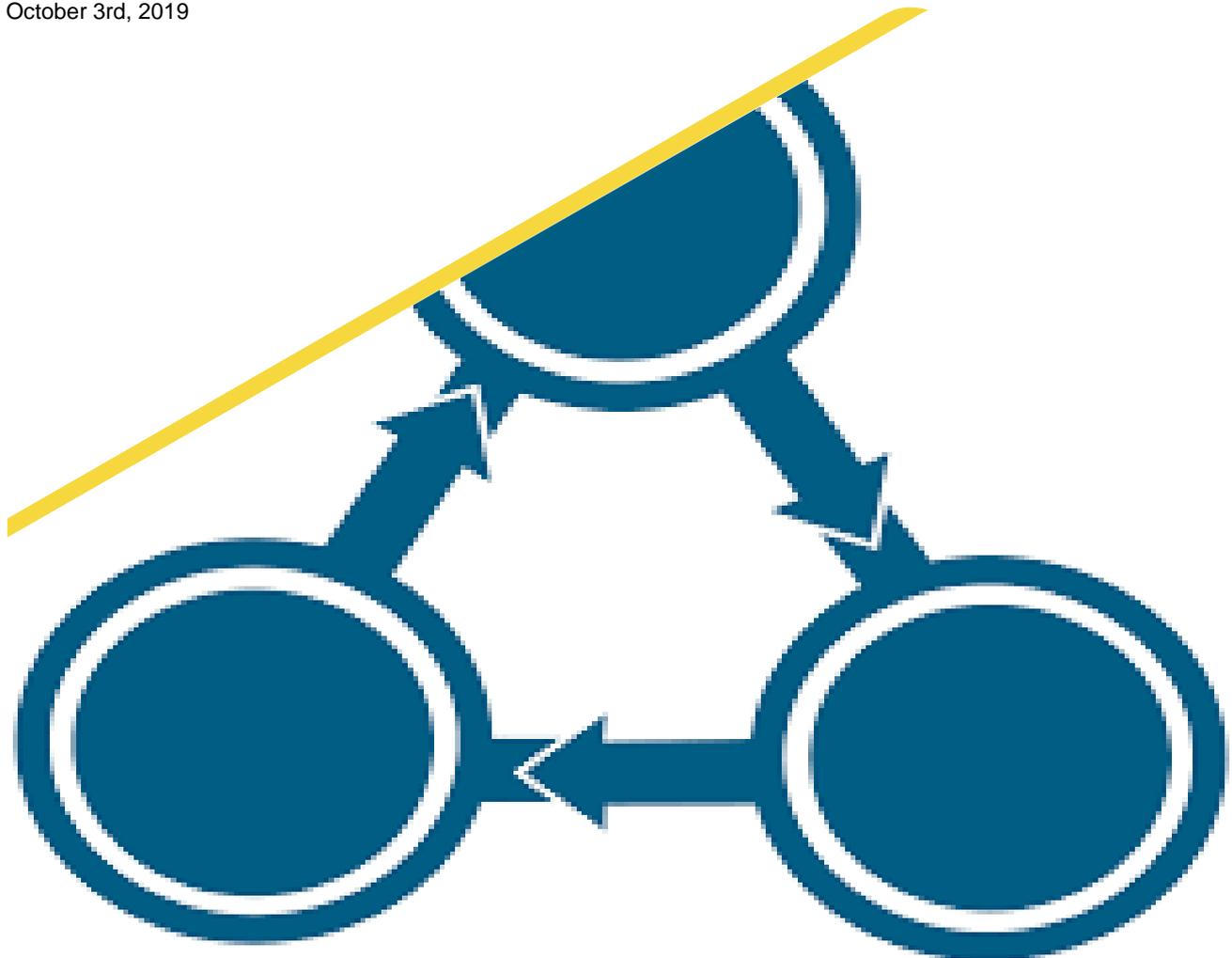
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19122298/12271 Final

October 3rd, 2019



Acronyms and Definitions

ESMS	Environmental and Social Management System
EBRD	European Bank for Reconstruction and Development
IFC	International Finance Corporation
KPI	Key Performance Indicators
PR	Performance Requirement (issued by EBRD)
PS	Performance Standard (issued by IFC)
HSE	Health, Safety and Environment
ESIA	Environmental and Social Impact Assessment
EPC	Engineering Procurement and Construction
ERP	Emergency Response Plan
EU	European Union
ESHS	Environmental, Social Health and Safety
ESMP(s)	Environmental and Social Management Plan(s)
MP	Management Plans
WF	Wind Farm
OHL	Overhead line
GIIP	Good International Industry Practice
OHS	Occupational Health and Safety
BAT	Best Available Technology
ISO	International Organization for Standardization

Client:	SOWI (Solar & Wind) Kosovo
Project:	Wind Farm Selac 1, 2 and 3 located near the village of Bajgora in the municipality of Mitrovica, in Northern Kosovo. It includes 20 km connection powerline.
Facilities:	The project consists of 27 WTGs type GE 3.8-137 with a capacity of 3.83 MW with a hub height of 110 m and total capacity of 103.41 MW. The energy will be connected to the existing grid through an 110kV overhead line (OHL), having approximately 20 km length. The power line is considered part of the Project during its construction phase and it will be considered an associated facility for the operation phase.
EPC Contractor:	NOTUS
Site Management:	All key managerial roles involved in the Construction Site management and in the windfarm operation, mainly referring to the SOWI personnel.

Table of Contents

- 1.0 PURPOSE AND SCOPE1**
- 2.0 BACKGROUND POLICIES AND STANDARDS.....2**
 - 2.1 National standards and regulation3
 - 2.2 International standards.....3
 - 2.3 Project limit values4
 - 2.3.1 Environmental and Social Planning4
 - 2.3.2 Health and safety planning5
- 3.0 ESMS STRUCTURE5**
 - 3.1 Manual structure7
 - 3.2 ESMPs structure7
- 4.0 IMPLEMENTATION AND OPERATION.....8**
 - 4.1 Resources, roles, responsibility and authority8
 - 4.2 Training, Awareness and Competence11
 - 4.3 Communication11
 - 4.4 Documentation13
 - 4.5 Operational control13
 - 4.5.1 Environmental and Social aspects.....13
 - 4.5.2 Occupational Health and Safety aspects14
 - 4.6 Emergency preparedness and response16
- 5.0 CHECKING17**
 - 5.1 Monitoring and measurements.....17
 - 5.1.1 Environmental and Social monitoring17
 - 5.1.2 OHS monitoring.....18
 - 5.1.3 Evaluation of compliance18
 - 5.1.4 Control of records.....20
 - 5.1.5 Audit.....21
- 6.0 MANAGEMENT REVIEW21**
- TABLES**
- Table 1: List of contractors involved in the construction phase.....2

Table 2: National standards and regulations3

Table 3: International standards3

Table 4: List of ESMPs6

Table 5: Roles and responsibilities9

1.0 PURPOSE AND SCOPE

This manual identifies and presents the framework and the strategy for implementing the Environmental and Social Management System (ESMS) of the Bajgora Windfarm Project (Project); the manual has been developed in accordance with SOWI policies, with the commitments undertaken in the ESIA, with Kosovo regulatory framework, with EBRD Environmental and Social Policy and Performance Requirements, IFC Performance Standards and IFC General and Sector Specific EHS Guidelines .

This document is intended as the ESMS overarching document and hereafter will be referred to as “ESMS Manual” (or simply “manual”). The term “ESMS” will be used to refer to the ESMS Manual, the Environmental and Social Management Plans (ESMPs) and all the related documentation.

The ESMS described in this manual applies to both **construction phase** and **operation phase** of the Project. It provides also guidelines to the contractor in charge for the Engineering Procurement and Construction (EPC) activities of the Project for addressing Environmental and Social aspects according to the standards mentioned above.

Additional details related to the operation phase of the Project are expected to come in due course; it is therefore recommended that this ESMS manual and the related ESMPs are subject to a systematic review process before start of operations in order to encompass and consider any information relevant to the environmental and social matters. The Purpose of this manual is to define:

- standards for the Project ESMS during the construction and operation phase;
- the scope of the ESMS during the construction and operation phase;
- responsibilities and commitments, for the implementation of the ESMS;
- the framework for the definition and implementation of the mitigation measures applicable to the Project
- provides the framework for the definition, implementation and management of the monitoring activities.
- the framework for the review of the environmental and social performance and of the adequacy of the ESMS manual and ESMPs.

The ESMS applies to normal operating conditions during the construction and operation activities and does not specifically address any emergency situation. Emergencies are addressed in a specific Emergency Response Plan (ERP).

The overall objective of the ESMS is to identify the mitigation and monitoring measures for the construction and operation activities in order to:

- adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimize and restore impacts to the environment;
- develop and implement policies, plans and procedures to integrate environmental and social aspects within the overall project management framework throughout its lifecycle;
- establish a monitor program to assess the effects of residual impacts on the environment;
- report the results of the periodic audits and provide for corrective actions, if necessary, in order to reach the planned objectives.

The Company will have fully control on the operations, however there are contractors vowed to carry out different duties during the operating period.

SOWI will have the following contracts for the operation of the wind farm:

- FSA with the turbine supplier (GE) for operation and maintenance of the turbines
- BoP+Asset Management with another contractor for operation and maintenance of the wind farm (excluding the turbines)

In addition, the following contractors will be involved in the construction phase.

Table 1: List of contractors involved in the construction phase

No.	Works/Services	Company
1	BOP Contractor)	Notus energy Kosovo (Kosovo/Germany
2	Civil works access roads and hardstands	GEO Mineral (Kosovo)
3	Civil works WTG foundations	Schmees Bau (Germany)
4	- OHL 110 kV - Internal cable lines	Elektrostublla (Kosovo)
5	- Civil works SS Selac - Internal cable lines - Electrical works SS Selac – primary and secondary electrical equipment - Civil works SS Vushtrri - Electrical works SS Vushtrri - SCADA (SS and TSO)	Wibres (Germany)
6	Security	Bajgora Security (Kosovo)
7	Supervision of constr. Works / Health & safety	H & B consulting (Kosovo)
8	HSE Manager	Zonnum (Kosovo)
9	Surveyor	N.SH Geodeti (Kosovo)
10	Turbine delivery	GE & ZabgrebTrans (US/Germany and Croatia)
11	Turbine erection	GE (US/Germany)

2.0 BACKGROUND POLICIES AND STANDARDS

This section includes all those policies, standards and requirements of reference for the ESMPs that are applicable to the Project during the construction phase and during the operation phase.

This section includes references:

- to applicable national laws and regulations, including those laws implementing host country obligations under international law and treaties;
- to the applicable international standards i.e. those issued by:

- EBRD Performance Requirements (May 2014) and related guidance documents and EU Regulatory framework (EU Regulations and Directives).
- IFC Performance Standards (2012) and EHS general and sector specific EHS Guidelines.

The project is expected to achieve whichever is more stringent amongst national standards and EBRD Performance Requirements (including EU Regulatory framework). The IFC General EHS Guidelines will be applicable in the absence of applicable Kosovo and EU standards.

2.1 National standards and regulation

Table 2: National standards and regulations

Kosovo Reg. Gaz. Date
Law no. 03/l-025 on environmental protection
Law no. 03/l-043 on integrated prevention pollution control
Law no.03/l–233 of nature protection
Law no. 03/l-214 on environmental impact assessment
Law no.03/l –230 on strategic environmental assessment
Law no. 03/l-160 on air protection from pollution
Law no. 04/l-174 on spatial planning
Law No.03/L-212 on Labour
Law No 04/L-161 on Safety and Health at Work
Law No. 04/L-219 on Foreigners
Law No.05/L-023 on Breastfeeding
Law No. 04/L-011 on Organizing trade union in Kosovo
Law No. 03/L-200 on Strikes
Law No. 04/L-006 on Social Economic Council
Law No. 2002/9 on Labour inspectorate

2.2 International standards

Table 3: International standards

International standards
EBRD Environmental and Social Policy and Performance Requirements (PR) – May 2014
EBRD PR 1: Assessment and Management of Environmental and Social Impacts and Issues
EBRD PR 2: Labour and Working Conditions

International standards
EBRD PR 3: Resource Efficiency and Pollution Prevention and Control
EBRD PR 4: Health and Safety
EBRD PR 5: Land Acquisition, Involuntary Resettlement and Economic Displacement
EBRD PR 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
EBRD PR 7: Indigenous Peoples
EBRD PR 8: Cultural Heritage
EBRD PR 9: Financial Intermediaries
EBRD PR 10: Information Disclosure and Stakeholder Engagement
Directive 2011/92/EU as amended by Directive 2014/52/EU
All EU Directives and regulation as applicable to the Project (details available each ESMPs)
IFC Performance Standards (PS) and Guidance Notes (GN)
IFC General EHS Guidelines: Environmental
IFC General EHS Guidelines: Occupational Health and Safety
IFC General EHS Guidelines: Community Health and Safety
IFC General EHS Guidelines: Construction and Decommissioning
IFC Industry Sector EHS Guidelines: Wind Energy (07/08/2015)
IFC Industry Sector EHS Guidelines: Electric Power Transmission and Distribution (20/04/2007)
IFC Performance Standards (PS) and Guidance Notes (GN)
Workers' accommodation: processes and standards A guidance note by IFC and the EBRD

2.3 Project limit values

2.3.1 Environmental and Social Planning

SOWI has defined a set of Environmental and Social Management Plans (ESMPs), consistent with SOWI policies and commitments, addressing the environmental and social aspects that have been identified in the ESIA as potentially having the most significant risks and impacts.

The ESMPs have to be implemented broadly across SOWI organization and the Project, including:

- EPC Contractor (including its Subcontractors), other contractors and primary suppliers over which SOWI has control or influence;

- Associated facilities (as defined by EBRD PR1: “*facilities that are not funded by the EBRD as part of the project and may be separate legal entities yet whose viability and existence depend exclusively on the project and whose goods and services are essential for the successful operation*”).

The level of detail and complexity of the ESMPs is commensurate with the expected impacts and risks of the Project.

Each of the ESMPs clearly identifies general objectives (or purpose) and targets. The ESMPs also identify KPIs that can be of qualitative or quantitative type, to be monitored for evaluating performance. For each KPI the plan identifies, if applicable/feasible, specific targets (for quantitative indicators) or acceptance criteria (for qualitative indicators) that can be tracked over defined time periods. Targets or acceptance criteria could be derived from specific regulatory requirements or threshold limits; the case where the identified targets represent also a regulatory requirement is specified in the plan.

2.3.2 Health and safety planning

SOWI is committed to implement all reasonable precautions to protect the health and safety of workers. Preventive and protective measures have to be introduced according to the following order of priority:

- Eliminating the hazard by removing the activity from the work process
- Controlling the hazard at its source through use of engineering controls;
- Minimizing the hazard through design of safe work systems and administrative or institutional control measures;
- Providing appropriate personal protective equipment (PPE) in conjunction with training, use, and maintenance of the PPE.

The application of prevention and control measures to occupational hazards is based on comprehensive risk assessment and job hazard analyses. The results of these analyses are prioritized as part of an action plan based on the likelihood and severity of the consequence of exposure to the identified hazards.

The “OHS Plan” describes the main elements for the implementation of the system for the OHS aspects management. This plan applies to work activities and employees under the control of SOWI, EPC Contractor/ Subcontractors and other contractors.

In addition, the JHAs carried out for each position of the workforce indicate OHS procedures and work instruction to be developed by all the companies that operate on the Construction Site and all the companies that will operate for the operation and maintenance of the windfarm.

The procedure and work instructions have to be appropriate to the nature and scale of the Project and have to contain provision of preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances.

3.0 ESMS STRUCTURE

The Project ESMS is structured as follows:

- SOWI ESHS Policies;
- ESMS Manual (this document);
- Environmental and Social Management Plans (ESMPs);
- Procedures, Work instructions;

- Records/reports evidence of ESMS application.

Before the drawing of the ESMS, it has been issued a Construction Early Management Plan (CEMP) for the first part of LNTP1 Works with the purpose of define requirements for dealing with potential impacts deriving from the construction activities foreseen.

The list of ESMPs that need to be implemented for fulfilling the commitments undertaken by SOWI in the ESIA are listed in the table below; they are listed by Performance requirements of the EBRD. The last two columns indicate whether the plan has been developed for the construction phase, for the operation phase or for both phases.

Table 4: List of ESMPs

EBRD PR (IFC PS)	Plans / Procedures	CONS.	OP.
PR 1: Assessment and Management of Environmental and Social Impacts and Issues (IFC PS1 5-24)	<ul style="list-style-type: none"> ESIA ESMS Manual Training and awareness procedures 	X X X	X X X
PR 2: Labour and Working Conditions (IFC PS2)	<ul style="list-style-type: none"> Human Resources and Labour Procedure and Plan Contractor, Supply Chain Management and Procurement Plan 	X X	X X
PR 3: Resource Efficiency and Pollution Prevention and Control (IFC PS3 - IFC EHS GL)	<ul style="list-style-type: none"> CEMP (plan for early construction) Pollution Prevention Plan <ul style="list-style-type: none"> Waste Wastewater Air Quality Noise Hazardous Materials Traffic Erosion control and reinstatement 	X X X X X X X X	X X X X
PR 4: Health and Safety (IFC PS4 - IFC EHS GL)	<ul style="list-style-type: none"> Occupational Health and Safety (OHS) Management Plan Community Health and Safety Management Plan Traffic Management Plan Emergency Preparedness and Response Management Plan Asbestos management plan 	X X X X X	X X X
PR 5: Land Acquisition, Involuntary Resettlement and Economic Displacement (IFC PS5)	-	-	-
PR 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources (IFC PS6)	<ul style="list-style-type: none"> Biodiversity Management Plan 	X	X
PR 7: Indigenous Peoples (IFC PS7)	-	-	-

EBRD PR (IFC PS)	Plans / Procedures	CONS.	OP.
PR 8: Cultural Heritage (IFC PS8)	■ Cultural Heritage Management Plan (including Chance Find Procedure)	X	-
PR 10: Information Disclosure and Stakeholder Engagement (IFC PS1 25-36)	■ Stakeholder Engagement Plan (SEP)	X	X

3.1 Manual structure

This Manual and the related ESMPs encompass, for specific Environmental and Social aspects, the full management process as conceived by ISO 14001: planning, operating, checking and reviewing.

This Manual is therefore structured according to the following scheme:

- 1.0 Purpose and scope
- 2.0 Background policies and standards
- 3.0 ESMS structure
- 4.0 Implementation and operation
- 5.0 Checking (i.e. monitoring and auditing)
- 6.0 Management review

3.2 ESMPs structure

ESMPs are structured according to the following scheme:

■ Purpose and scope of the Plan

This section provides a general and synthetic description of the requirements, commitments, actions, mitigations etc. the plan intends to implement.

■ Roles and responsibilities

This section describes the roles and positions within the Project (SOWI and Contractor) that is responsible for the implementation of the plan or for ensuring that the plan is implemented by Contractors. This section clearly states whether implementation plans have to be issued by Contractor.

■ Background Policies and Standards

This section includes policies, standards and requirements of reference for the plan. It may include lists or tables with key performance indicators and targets set by legislation or standards. The following subsections provide a list of the source documents for the requirements included in the plan (see section "Legal and Other Requirements" of this Manual).

- National standards and regulations
- International standards
- ESIA

- Other Source documents (e.g. permits)

- Mitigation measures

This section presents mitigation actions and measures (derived from source documents) that each plan intends to implement. It establishes a clear link between commitments (derived from source documents) and mitigation actions/measures required and between and mitigation actions/measures and acceptance criteria. Clear responsibilities are assigned to ensure that each action has a responsible party (SOWI, Contractor, Subcontractors) for its implementation (see also section “Operational Control” of this Manual).

- Monitoring actions

This section presents monitoring (intended as measurements) actions that each plan intends to implement. It clearly identifies measurement methodologies, KPI, targets/acceptance criteria and any mandatory limits (and the relative source document). Clear responsibilities are assigned to ensure that each monitoring action has a responsible party (SOWI, Contractor, Subcontractors) for its implementation (see also section “Monitoring (measurements)” of this Manual).

- Audit and review

This section includes the audit and review scheme for ensuring the correct implementation of the ESMS.

- Reporting

This section defines requirements for reporting the results of the monitoring activities and the performance against Targets/Acceptance criteria set out in the plan, as well as reporting frequency and responsibilities.

4.0 IMPLEMENTATION AND OPERATION

4.1 Resources, roles, responsibility and authority

The efficient establishment and implementation of an ESMS requires that all the Project parties (SOWI, Contractor and Subcontractors) involved define a dedicated organization with clearly identified responsibilities for managing Environmental, Social, Health and Safety aspect of the Project.

The organization charts represent SOWI organization adopted for the ESMS establishment and implementation during the construction phase (commissioning included). An organization chart will have to be developed for the operation phase.

For both the construction and operation phase, the Contractor has to develop and implement a dedicated organizational ESHS structure. This structure has to include clear interdependencies between SOWI's and Contractor's key HSE management roles.

Main roles and responsibilities for the implementation of the ESMS are indicated in each ESMP and in Table 5 below.

Table 5: Roles and responsibilities

Role	Overall responsibilities	Specific responsibilities
<p>Management</p>	<ul style="list-style-type: none"> ■ Management will ensure sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of actions, measures and monitoring activities under SOWI's responsibility. ■ This will include the selection of specialized contractor(s) for specific tasks to be carried out as part of the implementation of the ESMS such as (but not limited to) management surveys, monitoring activities and data analysis and reporting; ■ designating specific personnel on site or at the administrative level, clearly define their roles and responsibilities within the environmental and social management system; 	<ul style="list-style-type: none"> ■ Final approval of this Manual and of the related ESMPs and contractor and subcontractors' plans/procedures for the Project; ■ Taking appropriate actions to address major Non-Conformities based on audit reports, performance monitoring reports and on SOWI HSE Manager proposed approach
<p>HSE Manager</p>	<ul style="list-style-type: none"> ■ Ensuring that this Manual and related ESMPs are up to date and appropriate to the nature and scale of the Project and ensuring that they are implemented effectively; ■ Programming inspections and audit activities to ensure the correct implementation of this Manual and related ESMPs; and of specialized contractor(s) tasks ■ Collecting, organizing and reviewing monitoring data and performance monitoring reports provided by the specialized contractor(s) and providing summary results of such reports to Management, to stakeholders and to the Lenders 	<ul style="list-style-type: none"> ■ Ensuring that action/measures and monitoring activities directly under SOWI responsibilities are carried out timely and adequately according to the requirements of this Manual and related ESMPs; ■ addressing Non-Conformities through the definition of Preventive/Corrective actions proposing to Management, if necessary, amendments and/or updates to this Manual and related ESMPs and issuing revisions; ■ bringing major Non-Conformities immediately to the attention of Management;

Role	Overall responsibilities	Specific responsibilities
EPC Contractors and subcontractors	<ul style="list-style-type: none"> ■ effective execution of the specific tasks assigned in conformity with this manual, with the ESMPs and with contractual arrangements; ■ respect of EHS requirements included in the ESMS; ■ agree with the timing and logistics of the monitoring activities 	<ul style="list-style-type: none"> ■ provide relevant monitoring data and monitoring reports to as indicated in this manual and in the related ESMPs; ■ may propose changes and integrations to the monitoring activities included in this manual and in the related ESMPs; the proposed changes shall be evaluated and approved by HSE Manager and by Management.
All employees and contractors	<ul style="list-style-type: none"> ■ Comply with environmental management requirements. ■ Report any activities which are causing unnecessary biodiversity issues. 	<ul style="list-style-type: none"> ■ Give evidence that the relevant mitigation measures identified in the current ESMPs are being properly considered, implemented and monitored during execution of the works.

4.2 Training, Awareness and Competence

SOWI provides adequate training to all his employees and managers, ensuring that:

- Personnel is aware of the importance of developing and implementing SOWI Policies, ESMS and ESMPs and fulfilling requirements therein and that failure in fulfilling these requirements may lead to significant impacts to the Environmental, to population and to Project workers.
- Personnel within the organizational structure with direct responsibility for the Project's environmental, social, health and safety performances have the knowledge, skills, and experience necessary to perform their work, including current knowledge of the applicable laws, regulations and requirements of IFC Performance Standards and Guidelines;
- Personnel possess the knowledge, skills, and experience to implement the specific measures and actions required under the ESMS and the methods to perform such actions in a competent and efficient manner.

The Contractor is required to develop a "Training and Awareness Procedure". and a training program for its personnel and for Subcontractors' personnel. The procedure shall identify training needs, training planning and training execution; it shall include specific instruction for developing and maintaining an updated an ESHS training program.

The Contractor HR Manager is responsible for issuing/updating the Training Procedure supported by the HSE Manager.

4.3 Communication

Regarding the Project the following communication flows can be distinguished:

- a) internal communication among the various levels and functions of the organization;
- b) internal Project communication among the various parties involved in the Project (i.e. SOWI, Contractor);
- c) relevant communication from external interested parties related to Environmental and Social issues.

The internal communication amongst the various functions and roles and among Project parties is addressed in this Manual and in the other documentation of the ESMS such as ESMPs, procedures and work instructions.

The communication with and the grievances from external interested parties are addressed in a dedicated section below. The workers' consultation and grievances are as well addressed in a dedicated section below.

Workers' consultation and grievances

The Contractor is required to develop a "Grievance Mechanism" providing indications on the management of Project workers grievances. The mechanism shall include a framework for receiving, recording, answering and facilitating resolution of workers' concerns and grievances with particular reference to labour and OHS issues.

In order to ensure the effectiveness of the process and minimization of grievances related to OHS/Labour issues, OHS procedures have to be developed in consultation with personnel who are directly involved in the hazard analysis processes for the relevant tasks.

Contractor has to require that Subcontractors' workers grievances are managed in a similar way.

In particular, a grievance mechanism open to employee and non-employee workers must be implemented. It his due to ensure that all workers directly and indirectly employed are informed about this channel to submit grievances. It is due to ensure that the grievance mechanism is managed in line with indications of the SEP and that appropriate budget and resources are assigned

Stakeholders engagement and grievances

SOWI established an effective Stakeholders engagement process, aimed at building strong, constructive and responsive relationships for the successful management of Project's environmental and social risks and impacts, since the ESIA phase.

Stakeholders' analysis and planning have been provided in a "Stakeholder Engagement Plan" (SEP) describing the activities to be implemented by SOWI to ensure that a full participatory process is put in place and that all relevant Stakeholders, including potentially Affected Communities (particularly involving those working in the field of tourism and fisheries) and any possibly disadvantaged or vulnerable group, are involved in the engagement process throughout the entire Project life-cycle.

The SEP shall be regularly updated to ensure that:

- it remains fit for the purpose at each phase of the Project;
- it addresses the outcomes of Stakeholder consultation activities;
- it addresses the grievances received from Stakeholders.
- In particular, the SEP updated for the Construction phase:
- Includes a Grievance Mechanism, a procedure providing a framework for receiving, recording, answering and facilitating resolution of Affected Communities' concerns and grievances about SOWI environmental and social performance;
- Ensure the disclosure to the Affected Communities of relevant information on:
 - The purpose, nature and scale of the Project;
 - The duration of proposed Project activities;
 - Any risk to and potential impacts on such communities and relevant mitigation measures;
 - The envisaged Stakeholder engagement process;
 - The Grievance Mechanism;
- Ensure a Stakeholders' Consultation and Participation process is in place and culturally appropriate for the potentially Affected Communities, their decision-making process and the needs of disadvantaged or vulnerable groups.
- Document how feedback from Stakeholders' Consultation and Participation (including views of potentially Affected Communities on matters that may affect them directly) shall be included into SOWI Management decision-making process and used to improve impact mitigation measures;
- Ensure the provision of periodic reports to the potentially Affected Communities, that describe progress with the implementation of the ESMS on issues that may involve ongoing risk to or impacts on such Communities, and on issues that the Consultation process or grievance mechanism have identified as of their specific concern.

The Contractor is not required to develop its own SEP as this activity falls under the responsibility of SOWI. The Contractor is required to collaborate with SOWI on an "as needed" basis for:

- providing the necessary information for answering to Stakeholder requests;
- providing the necessary support to address Stakeholders' grievances.

4.4 Documentation

Based on the outcomes of the ESIA all the required management plans and procedures have been developed

With reference to the contents of the present document, the ESMS documentation consists of:

- Policies;
- ESMS Manual;
- Environmental and Social Management Plans (ESMPs);
- Plans/procedures;
- Work instructions (if needed to be developed in general by the contractor);
- Records/reports evidence of ESMS application.

All documents and procedures of the ESMS are issued, revised and controlled according to the SOWI Project Management System. The activities related to the control of records are provided in this Manual.

The following structure is intended as a general rule; more documents may be developed by SOWI or Notus as needed during the construction or operation phases. At present stage the EPC needs to develop:

- Operation phase policies
- Safety procedures
- emergency plan
- work instructions
- monitoring records

4.5 Operational control

4.5.1 Environmental and Social aspects

Main Environmental and Social aspects to be addressed by the ESMS have been identified in the ESIA and can be summarized as follows:

- Employment and labour issues
- Public health issues in relation to Workers and Local community interferences
- Air emission (in particular dust)
- Traffic related risks and impacts
- Noise emissions
- Wastewater emissions
- Waste production
- Hazardous materials management
- Soil management
- Water/Energy resources management

■ Biodiversity management

No significant adverse impacts to cultural heritage have been envisaged by the ESIA. The occurrence of cultural heritage findings during construction has been assessed as low. In any case, as part of SOWI ESMS, a “Chance Finds Procedure” has been developed for managing chance finds which have to be applied in the event that cultural heritage is subsequently discovered, consistently with the requirements of this EBRD PR 8.

Operational controls for the significant Environmental and Social aspects are addressed by SOWI in the ESMPs and in particular in the ESMPs section “Management methods and mitigation measures”, consistently with its ESHS Policies and the commitments included in the ESIA.

4.5.2 Occupational Health and Safety aspects

Main OHS aspects to be addressed by the Contractor’s OHS plan are:

- Over-exertion, and ergonomic injuries and illnesses;
- Slips and Falls on the same elevation
- Work in heights, falls from elevation
- Struck by Objects related to the potential fall of materials or tools
- Exposure to dust generated by various sources
- Confined Spaces and Excavations
- Moving Machinery
- Exposure to chemicals, hazardous or flammable materials, and wastes.

A JHAs is required for each position of the workforce; the JHA shall indicate OHS procedures and work instruction to be developed by all the companies that operate on the Construction Site and that will carry out the operation and maintenance of the windfarm once completed.

The procedure and work instructions have to be appropriate to the nature and scale of the Project and have to contain provision of preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances.

The process of identifying hazards, assessing risks and issuing HS procedures is a continuous process and have to be repeated/carried out every time significant changes to working conditions occurs or new working operations or new type of machineries are used for the Project purposes. The OHS procedures and work instruction are therefore subject to continuous revision based on the outcomes of the risk assessment process.

SOWI employees are not directly involved in construction and/or operation in their organization. Construction operations are organized and carried out by the EPC Contractor and its Subcontractors. SOWI employees carry out mainly office activities and some field activities consisting mainly on inspections and auditing.

During the execution of the works under the Construction Contracts, the Contractor shall comply with the applicable national and international requirements detailed in section “Legal and Other requirements” of this Manual. The Contractor shall implement and demonstrate compliance with these requirements at all times.

The Contractor has to address the requirements of those applicable standards in the form of a Specific Construction OHS Plan that meets SOWI’s Minimum OHS Standards for Construction Contracts and specific Project requirements stated in the ESIA and this manual. Project Work Procedures/Instructions, detailing the operating criteria required to implement the standards developed through Job Hazard Analysis.

A list of OHS procedure and work instruction that may be required to be prepared by Contractor and Subcontractors for their workers is provided below (the need for OHS procedures and work instruction is based on the JHA):

- Training and Orientation
- Office Safety
- Travel Safety
- Emergency Preparedness (Medical, Fire, Chemical, Weather)
- Permit to Work
- Substance Abuse Prevention Program
- Work Hour Control/Working Alone
- Security
- Industrial Hygiene
- Eating and Sanitation Facilities
- Working in Heat
- Abrasive Blasting
- Hazard Communications
- Control of Substances Hazardous to Health
- Control of natural occurring asbestos
- Pre-Project Medical Examination — International/National
- Prevention of diseases
- Ionizing Radiation Control
- Personal Protective Equipment
- Fall Protection/Working at height
- Hot Work (Welding, Cutting, Burning)
- Pressurized/Compressed Air Equipment and Compressed Gas Cylinders/Operations
- Cranes and Rigging — Introduction/Pre-use
- Loading and Unloading Material
- Powered Industrial Trucks (Forklifts)
- Aerial Lifts, Elevating Work Platforms, and Material/Personnel Hoists
- Working Near Overhead Power Lines
- Portable Ladders
- Scaffolds

- Manual Handling
- Hand and Portable Power Tools
- Electrical Work Safety
- Excavation, Trenching, and Shoring
- Earthwork, Concrete, and Masonry
- Drill and Blast Operations
- Hot Tapping
- Steel Erection
- High-Pressure Water Cleaning
- Tank and Piping System Testing
- Confined Space Entry
- Accommodation H&S requirements

In addition, the Contractor has to ensure that;

- The resources are in place to implement the requirements of the ESMS;
- The Contractor personnel receive the required training for the safe performance of the assigned tasks;
- Systems are in place for routine auditing and inspection to ensure the compliance with the applicable national and international requirements and conformity with SOWI ESMS requirements;
- Systems are in place for reporting and investigations of environmental events, near-misses, accidents, incidents and potential hazards within an agreed and legally required timeframe.

The Contractor has to provide progress updates to SOWI on an agreed basis on the OHS performance.

The Contractor has to keep all the records and other relevant documentation to demonstrate compliance/conformity to Project requirements for the duration of the Contract.

4.6 Emergency preparedness and response

Contractor is required to establish and maintain a Site Emergency Response Plan(s) – ERP(s) (developed in accordance with IFC EHS Guidelines - 3.7 Emergency Preparedness and Response) in order to be prepared to respond to accidental and emergency situations associated with the Project, in a manner appropriate to prevent and mitigate any harm to people and/or the environment.

The Contractor in the ERP(s) shall include detailed information for the following basic elements:

- Identification of emergency situations that may occur, and communities and individuals that may be impacted;
- applicable legislation requirements and reference and contact details of local government agencies (e.g. police, emergency rescue, harbour authority);
- Roles and responsibilities;
- emergency response standard operating procedures (SOP);

- the provision of equipment and resources and designate responsibilities for emergency preparedness and response;
- Communication procedures, including that with potentially Affected Communities and local government agencies;
- periodic training in order to ensure effective response to possible emergency situations.
- periodic emergency drills, involving Affected Communities and in order to ensure preparedness to possible emergency situations
- Business continuity and contingency.

The ERPs, as minimum requirement, shall address the following emergency conditions:

- Life and fire safety including natural disasters (according to IFC EHS Guidelines - 3.3 Life and Fire Safety)
- Leaks or spills of hazardous chemicals/hazardous waste in the Construction site and the operating windfarm once completed (according to IFC EHS Guidelines - 1.5 Hazardous Materials Management);
- Transportation of hazardous chemicals/ waste off-site (according to IFC EHS Guidelines - 3.5 Transportation of Hazardous Materials);
- First aid emergencies (according to IFC EHS Guidelines – 2.1 General Facility Design and Operation - First aid).

Contractor, with the support of SOWI, shall involve the Affected Communities and the local government agencies in the preparation of the ERPs.

The Contractor, with the support of SOWI, shall carry out periodical emergency drills that also involve Affected Communities and local government agencies on a quarterly basis. The emergency drills will have to be documented by Contractor.

The ERPs have to be periodically reviewed and revised, as necessary, to reflect possibly changing conditions during the Construction phase. A specific ERP will have to be developed for the windfarm management, before the start of the operation phase.

Contractor must properly document emergency preparedness and response activities, resources, and responsibilities, and have to provide, on request, appropriate information to potentially Affected Community and relevant government agencies.

The ERP shall be subject to periodic audit and inspections by SOWI and by Contractor according to the “Audit and non-Conformities procedure”.

5.0 CHECKING

5.1 Monitoring and measurements

5.1.1 Environmental and Social monitoring

Monitoring and measurements activities and related reporting for the significant Environmental and Social aspects are addressed in the ESMPs and in particular in the sections “Monitoring (measurements)” and “Reporting”, consistently with its ESHS Policies and the commitments included in the ESIA.

The ESMPs provides the relevant information to monitor/measure the Environmental and Social performance, to ensure ESMS compliance with national and international regulatory requirement and conformity with ESMS requirements.

The extent of monitoring and measurement has to be commensurate with the Project's ESHS risks and impacts and with relevant obligations/requirements.

The scope, frequency, methodologies and responsibilities (SOWI or Contractor) of such monitoring and measurement, as well as reporting needs, are indicated in the ESMPs and depend upon the nature and scope of the monitoring activities identified and are undertaken in accordance with applicable Project requirements (ESIA commitments, EBRD PR and Kosovo regulation).

If needed, monitoring and measurement have to be adjusted according to possible actions requested by relevant regulatory authorities.

SOWI is responsible for collecting and aggregating the information related to monitoring activities carried out by Contractor and for developing, updating and managing the tools for data collection and aggregation.

5.1.2 OHS monitoring

The contractor is required to develop an OHS monitoring program. The OHS monitoring program should verify the effectiveness of prevention and control strategies. The selected indicators should be representative of the most significant occupational, health, and safety hazards, and the implementation of prevention and control strategies. Therefore, the OHS monitoring program have to be closely linked to the findings of JHA. The occupational health and safety monitoring program to be developed by Contractor has to include, as a minimum:

Safety inspection, testing and calibration of:

- OHS critical equipment (i.e. forklifts, cranes and lifts)
- All safety features and hazard control measures focusing on engineering and personal protective features (i.e. PPE continues to provide adequate protection and is being worn as required);
- Hazardous work procedures (i.e. permit to work),
- Monitoring of the workers exposure: Monitoring methodology, locations, frequencies, and parameters should be established individually for each task or activity following the JHA (i.e. dust monitoring, confined space air quality monitoring)

5.1.3 Evaluation of compliance

The evaluation of compliance will be carried out through internal auditing (refer to section "Audit and Non-Conformities" for further details); compliance evaluation addresses specifically:

- the regulatory requirements of the Kosovo legislation
- the relevant permits obtained under Kosovo legislation
- commitments undertaken by SOWI in the ESIA

Any requirement of the above documents that is not met or it is only partially met will generate a "Non-Compliance" that will be treated as indicated in the section below "Non-Conformities, Non-Compliances, Preventive/Corrective Actions".

The Contractor is required to implement a similar system for the evaluation of compliance of its operation and of Subcontractors' operations.

Non-Conformities, Non- Compliances, Preventive/Corrective Actions

In general Audits can lead to the identification by SOWI audit teams of issues of concern defined as follows:

- Non-Conformity (N-CF): non-fulfilling, lack or deviation to requirements of the ESMS or to

- Non-Compliance (N-CP): non-fulfilling, lack or deviation to requirements of external rules and regulations, such as EBRD Performance Requirements and Kosovo Regulations).
- Observation (OBS): issues for which no clear lack or deviation to requirements are identified but that may need specific actions aimed at improving performance.

N-CFs, N-CPs and OBS can be identified as well by any of the SOWI personnel at any time during the Construction phase and the Operation phase; in this case the person who believes to have observed a specific condition that may be of Environmental Social, health or Safety concern has to inform immediately the HSE Manager. The HSE Manager is responsible for evaluating whether the reported condition represent an actual N-CFs, N-CPs or OBS.

N-CFs, N-CPs and OBS are treated by HSE Manager through the implementation of Preventive/Corrective Actions aimed at eliminating their consequences and root causes in order to prevent recurrence. Based on the assessment, the issues reported are categorized in terms of seriousness according to the following definitions:

- Level 1: complete deviation or non-fulfilment of the requirements, based on objective evidences. N-CFs/N-CPs are classified as level 1 if their resolution has to be managed in coordination with external bodies (i.e. authorities), if they are expected to have impacts on SOWI operations and activities and if they are expected to be reported by media. These N-CFs/N-CPs have to be immediately communicated to SOWI Management by the HSE Manager as part of the Management Review process. The HSE Manager proposes PA/CAs; SOWI Management approves PA/CAs and eventually decides further actions to be implemented. The N-CFs/ N-CPs and the PA/CAs implemented should be disclosed to stakeholders during one of the periodic engagement activities.
- Level 2: complete deviation or non-fulfilment of the requirements, based on objective evidences. N-CFs/N-CPs are classified as level 2 if their resolution has to be managed in coordination with other internal managers and if they are expected to have impacts on SOWI operations and activities. These N-CFs/N-CPs have to be immediately communicated to SOWI Management by the HSE Manager as part of the Management Review process. The HSE Manager proposes PA/CAs; SOWI Management approves PA/CAs and eventually decides further actions to be implemented.
- Level 3: partial deviation or non-fulfilment of the requirements, based on objective evidences. N-CFs/N-CPs are classified as level 3 if their resolution can be managed directly by the HSE Manager and if they are expected to have only limited impacts on SOWI operations and activities. These N-CFs/N-CPs are addressed directly by HSE Manager through PA/CAs. Progresses are communicated to SOWI Management on a periodical basis as part of the Management Review process.
- Level 4 is assigned to all observations (see above for the OBS definition).

Level 1 and Level 2 N-CFs/N-CPs are also referred to as “major N-CFs/N-CPs”; while Level 3 N-CFs/N-CPs are referred to as “minor N-CFs/N-CPs”.

Corrective Actions are appropriate to the effects of the N-CFs/N-CPs encountered and Preventive Actions are appropriate to the effects of potential problems.

The Contractor is required to implement a similar system for addressing N-CFs/N-CPs of its operation and of the Subcontractors’ operations.

OHS Incident reporting and investigation

All incidents and hazards occurred within the Project will be reported and investigated; all incidents must be reported to the SOWI and Contractor HSE Managers.

All Project personnel are responsible for reporting incidents (including near misses) and hazards to their immediate supervisor as soon as practicable after the incident occurs or the hazard is identified. Whenever practicable, every individual is required to immediately rectify identified hazards provided they do not expose themselves to any danger.

Incidents may be subject to a detailed investigation and required reporting. The report has to meet national legislative reporting requirements.

Disagreements over action taken in response to a reported hazard will be resolved in consultation with the HSE Managers.

Each company operating at the Construction Site and at the windfarm (once completed) is responsible for providing any person under their responsibility and who is affected by any critical incident with:

- Appropriate counselling services;
- Employee assistance program;
- Immediate notification and contact with their family or next of kin;
- Direct access to communications at all times (such as phones).

5.1.4 Control of records

SOWI has to maintain records demonstrating ESMS performance and conformity/compliance to the requirements set out in its ESMS and in the National and International regulations. Relevant records have to be maintained and archived under responsibility of the SOWI HSE Manager.

A list of main recording documents of SOWI ESMS is provided below:

- Reports of internal audits;
- Reports of third parties' audits;
- Non-Conformities, Corrective/Preventive Actions forms;
- Minutes of the Management Review meetings;
- Reports of the monitoring (measurement) activities, including analytical certificates;
- Records of grievances submitted to SOWI;
- Records of incidents reporting and investigations;
- Communication with the authorities;
- Communication material addressed to Stakeholders;
- Records of Stakeholder engagement activities;
- Any other relevant document providing evidence of the ESMS performance.

The process for records management is described in the relevant sections of this Manual and in the relevant ESMPs (Reporting section) and procedures.

The Contractor is required to implement a similar system for managing records related to its operation and to Subcontractors' operations.

5.1.5 Audit

Internal Audit

SOWI has implemented an internal inspection and audit system to periodically and effectively verify:

- Correct implementation of SOWI ESHS Policies, of the ESMS Manual, of the ESMPs and conformity to the requirements set therein;
- Correct implementation of Contractor's Plans (descending from SOWI ESMPs requirements);
- Project operation compliance to the national regulatory requirements (Kosovo legislation and relevant permits), to the ESIA commitments and to the IFC Performance Standards;
- Contractor meets its contractual obligations.

An internal inspection and audit program are established, implemented and maintained by SOWI on a periodical basis, taking into consideration the ESHS aspects importance of the operation(s) concerned and the results of previous audits/inspections. The audit program indicates audit schedule, frequency and the objectives as well as responsible internal auditors; the program can be amended based on the outcomes of the audits and of the Management Reviews.

The Contractor is required to implement a similar inspection and audit system in relation to its operation and to Subcontractors' operations.

External Audit

External Audits can be performed by third parties if allowed by SOWI Management.

These external Audits are aimed at verifying:

- Project compliance to the Kosovo regulatory requirements (legislation and relevant permits), to the ESIA commitments and to the EBRD Performance Requirements;
- Correct implementation of SOWI ESMS, including Policies, Manual, ESMPs, procedures and conformity to the requirements set therein.

SOWI Management and Contractor shall provide full availability of their resources, as well as full access to site and documentation for the allowed external audits.

6.0 MANAGEMENT REVIEW

SOWI Management reviews on a periodical basis (at least half-annually) the performance of the ESMS, in order to ensure its continuing suitability, adequacy and effectiveness.

HSE Manager is responsible for convening a Management Review meeting in case of:

- Major Non-Conformities and Non-Compliances (i.e. those of Level 1 and Level 2);
- Serious injuries/fatalities to workers of SOWI, Contractor or Subcontractors;
- Significant changes to the context or to the Project entailing the adoption of the management of change procedure;
- Grievances having the potential to impact media or to result in a claim;
- Significant changes to the regulatory framework.

SOWI HSE Manager is responsible for preparing the agenda of the Management Review meeting and for preparing input documentation/information. Input documentation/information to the Management Review includes but is not limited to:

- Internal audit reports and records of Non-Conformities and Non-Compliances;
- Injuries statistics;
- Corrective/Preventive Actions progress;
- Audit reports from other third parties;
- Monitoring reports;
- Grievances records.

SOWI HSE Manager is responsible for providing a summary of the ESMS performance since the last Management Review meeting, to summarize the progress of the action decided during the last meeting, to address specific issues on an “as needed basis” and to propose, if deemed necessary, further actions to be approved by SOWI Management.

SOWI HSE Manager is responsible for issuing the minutes of the Management Review meeting including a detailed description of the actions decided, measures adopted and related responsibilities. This may include changes to the ESMS documentation, including the policies, the Manual, ESMPs. Procedures and work instructions.

SOWI Management is responsible for deciding actions and measures appropriate to the nature and scale of the Project and related responsible.

The Contractor is required to implement a similar Management Review system in relation to its operation and to Subcontractors' operations.



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REPORT

Bajgora Wind Project
Environmental and Social Impact Assessment
Early Works Construction Environmental and Social Management Plan

Submitted to:

SOWI Kosovo LLC

Submitted by:

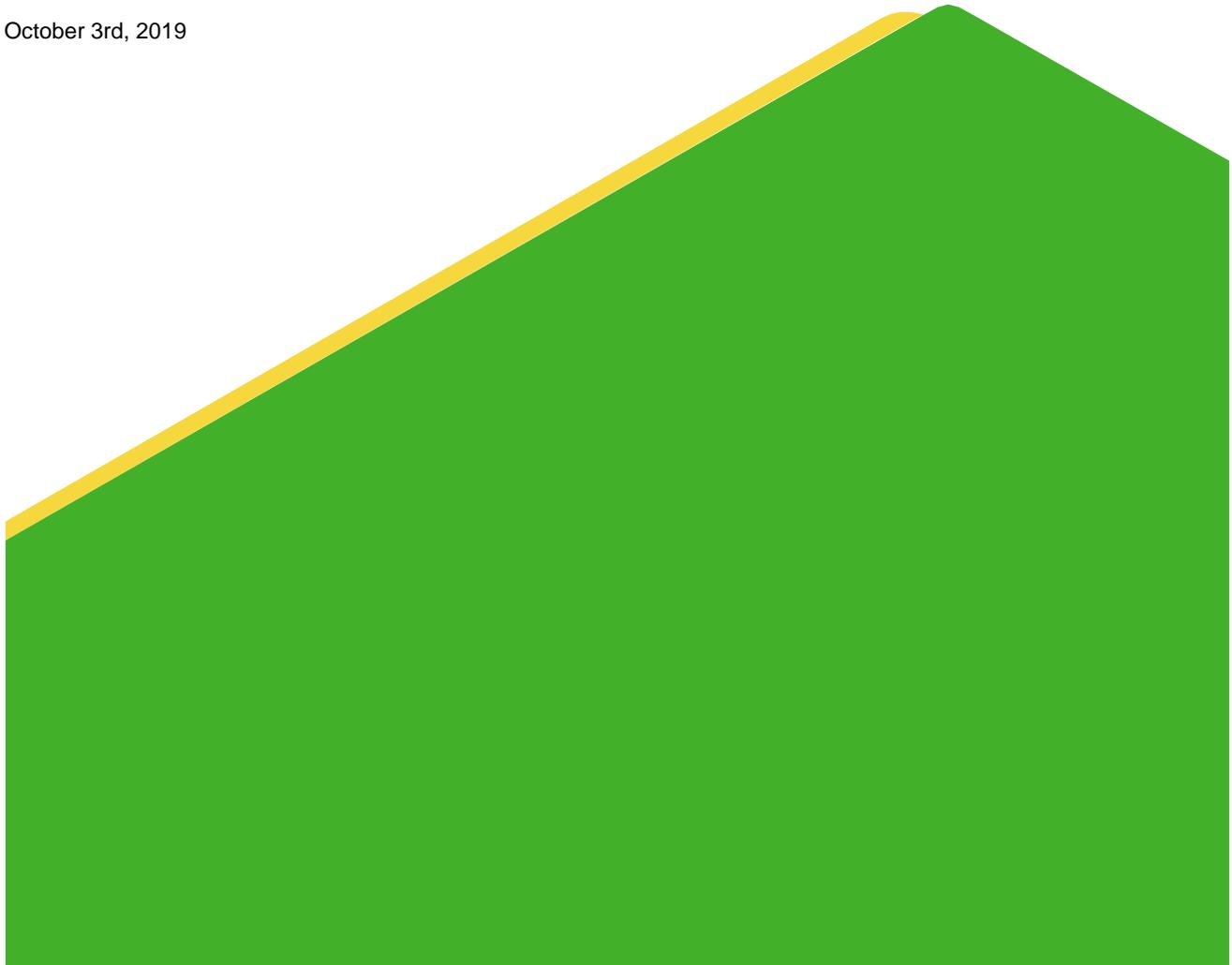
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19122298/12211 Final

October 3rd, 2019



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Table of Contents

1.0 INTRODUCTION	1
2.0 SCOPE	4
3.0 ROLES AND RESPONSIBILITIES	4
4.0 MITIGATION AND MONITORING MEASURES	6
5.0 AUDIT AND REVIEW	22
6.0 REPORTING	22
6.1 Mitigation measures reports.....	22
6.2 Monitoring reports	22
6.3 Audit report.....	23
 TABLES	
Table 1: Key Roles and Responsibilities	4
Table 2: Mitigation and monitoring measures for construction activities	8

1.0 INTRODUCTION

The present management plan was developed for the first steps of planned construction works (defined LNT P1 works), here after identified as “construction activities”, that will include (Figure 1):

- 1) installation Subcontractor Site camp for road-construction;
- 2) reconstruction of approximately 600 meters of the existing access road (no widening required);
- 3) widening (cuts and fills) of 500 meters of the of existing road starting;
- 4) widening expected to include blasting and profile levelling on 600m of existing road for the construction of Bypass Road Selac II;
- 5) clearance gauge at WTG 7 and 8 according to construction permit (approx. 1000 m).

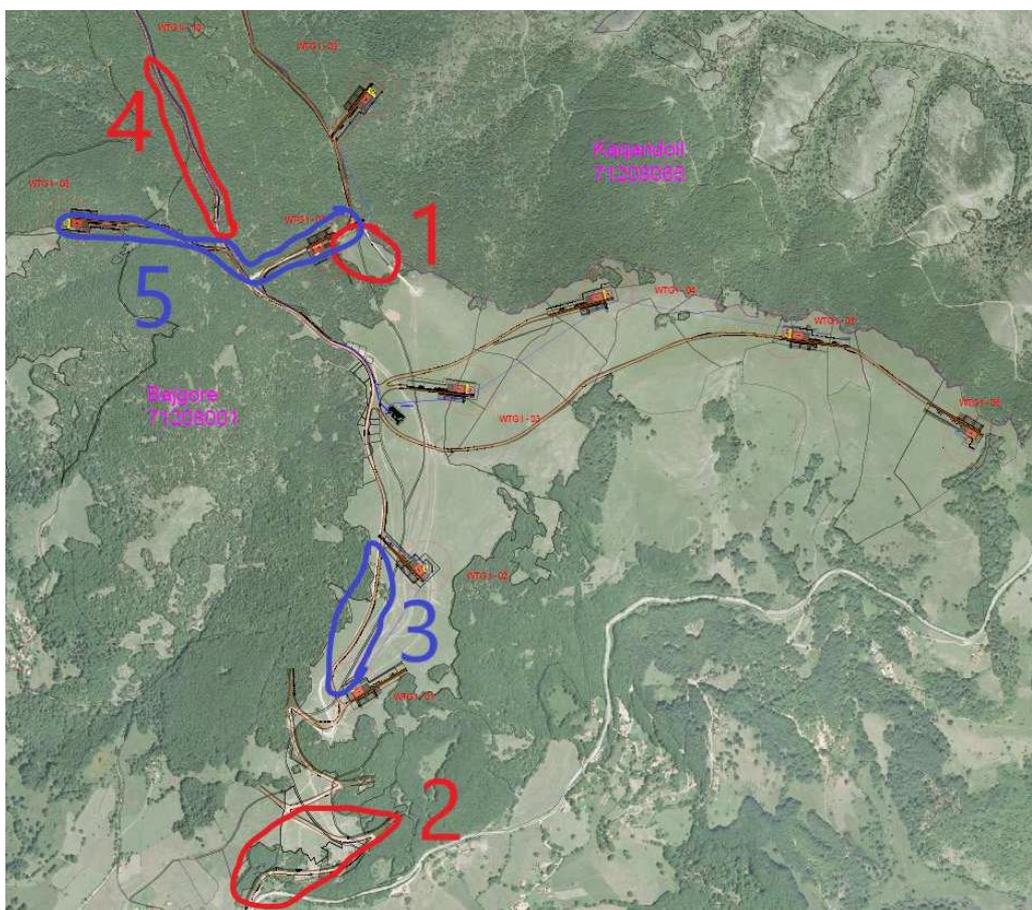


Figure 1: Locations of the planned works

These activities will be performed according to the construction permits already obtained. Activities 3 to 5 will include limited loss of natural habitat. Activities 4 to 5 will include limited tree clearing in order to create clearance gauge.

Specific management plans will be developed for the management of other project activities of the construction and operation phases and for the associated environmental impacts.

The present document was prepared to ensure compliance with National Laws and shall also conform to international standards and practices generally prevailing in the Energy industry, including relevant

Performance Standards of the International Finance Corporation (IFC 2012 PS) And of the European Bank for Reconstruction and Development (EBRD, 2014 PR).

The document includes some site-specific measures identified following a walk-over survey conducted by local consultant Biomaster on May 4-5 with site personnel, which has identified some biodiversity features requiring specific attention (Figures 2-6).



Figure 2: Biodiversity features identified in Section 1

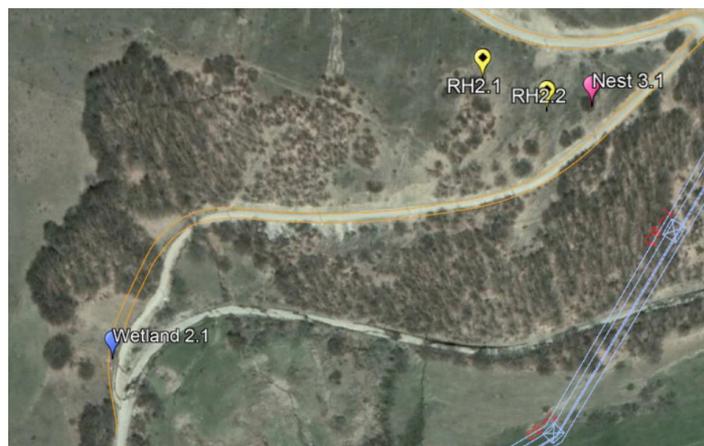


Figure 3: Biodiversity features identified in Section 2



Figure 4: Biodiversity features identified in Section 3



Figure 5: Biodiversity features identified in Section 4

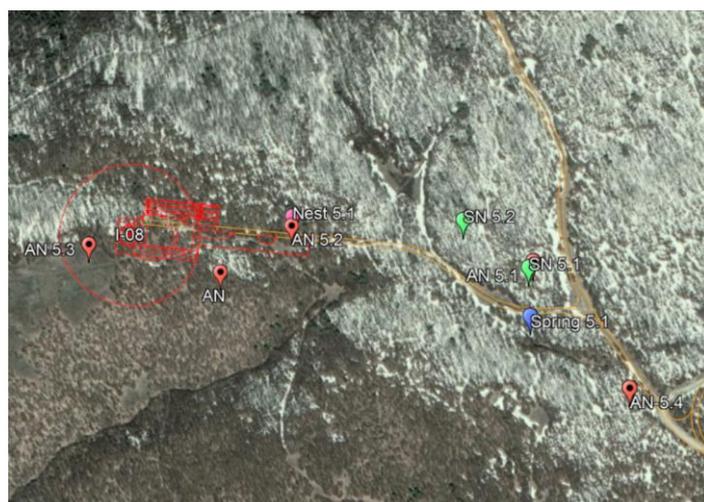


Figure 6: Biodiversity features identified in Section 5

2.0 SCOPE

The purpose of the Environmental Management Plan (EMP) is to define the requirements for dealing with the potential impacts deriving from the construction activities foreseen on the environment during the construction activities.

The overall objectives is to identify the mitigation and monitoring measures for the construction activities in order to:

- adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimize and restore impacts to the environment;
- development and strict implementation of policies, plans and procedures to integrate environment al management within the framework of the environmental and social management plans/procedures for the lifecycle of the project;
- establish a monitor program to assess the effects of residual impacts on the environment;
- report the results of the periodic audits and provide for corrective actions, if necessary, in order to reach the plan objectives.

3.0 ROLES AND RESPONSIBILITIES

Principal roles and responsibilities for the implementation of this plan are in outlined Table 1 below. The organization chart for the early construction works is presented in Figure 7

Table 1: Key Roles and Responsibilities

Role	Responsibilities
Management	<ul style="list-style-type: none"> ■ management Plan final approval; ■ ensuring sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of actions, measures and monitoring activities. This will include the selection of specialized contractor(s) for specific tasks to be carried out as part of the implementation of this Management Plan such as (but not limited to) biodiversity surveys, monitoring activities and data analysis and reporting; ■ designating specific personnel on site or at the administrative level, clearly define their roles and responsibilities within the environmental and social management system; ■ taking appropriate actions to address major Non-Conformities, based on audit reports, performance monitoring reports and on HSE Manager proposed approach and actions.
E&S Manager	<ul style="list-style-type: none"> ■ ensuring that this Management Plan is up to date and appropriate and ensuring that this Management Plan is implemented effectively; ■ ensuring that action/measures and monitoring activities directly under responsibilities are carried out timely and adequately according to this Management Plan requirements; ■ proposing to Management, if necessary, amendments and/or updates to this Management Plan and issuing plan revisions;

Role	Responsibilities
	<ul style="list-style-type: none"> ▪ programming inspections and audit activities to ensure the correct implementation of this Management Plan and of specialized contractor(s) tasks; ▪ addressing Non-Conformities through the definition of Preventive/Corrective actions; ▪ bringing major Non-Conformities immediately to the attention of Management; ▪ collecting, organizing and reviewing monitoring data and monitoring reports from the specialized contractor(s) and providing summary results of such reports to Management, to stakeholders and to the Lenders.
Specialized contractor(s)	<ul style="list-style-type: none"> ▪ effective execution of the specific tasks assigned in conformity with this Management Plan and with contractual arrangements; ▪ respect of EHS requirements included in the ESMS; ▪ agree with the timing and logistics of the monitoring activities; ▪ provide relevant monitoring data and monitoring reports to as indicated in this plan; ▪ may propose changes and integrations to the monitoring activities included in the Management Plan; the proposed changes shall be evaluated and approved by HSE Manager and by Management.
All employees and contractors	<ul style="list-style-type: none"> ▪ Comply with environmental management requirements. ▪ Report any activities which are causing unnecessary biodiversity issues. ▪ Demonstrate that the relevant mitigation measures identified in the current Construction EMP are being properly considered, implemented and monitored during execution of the works.

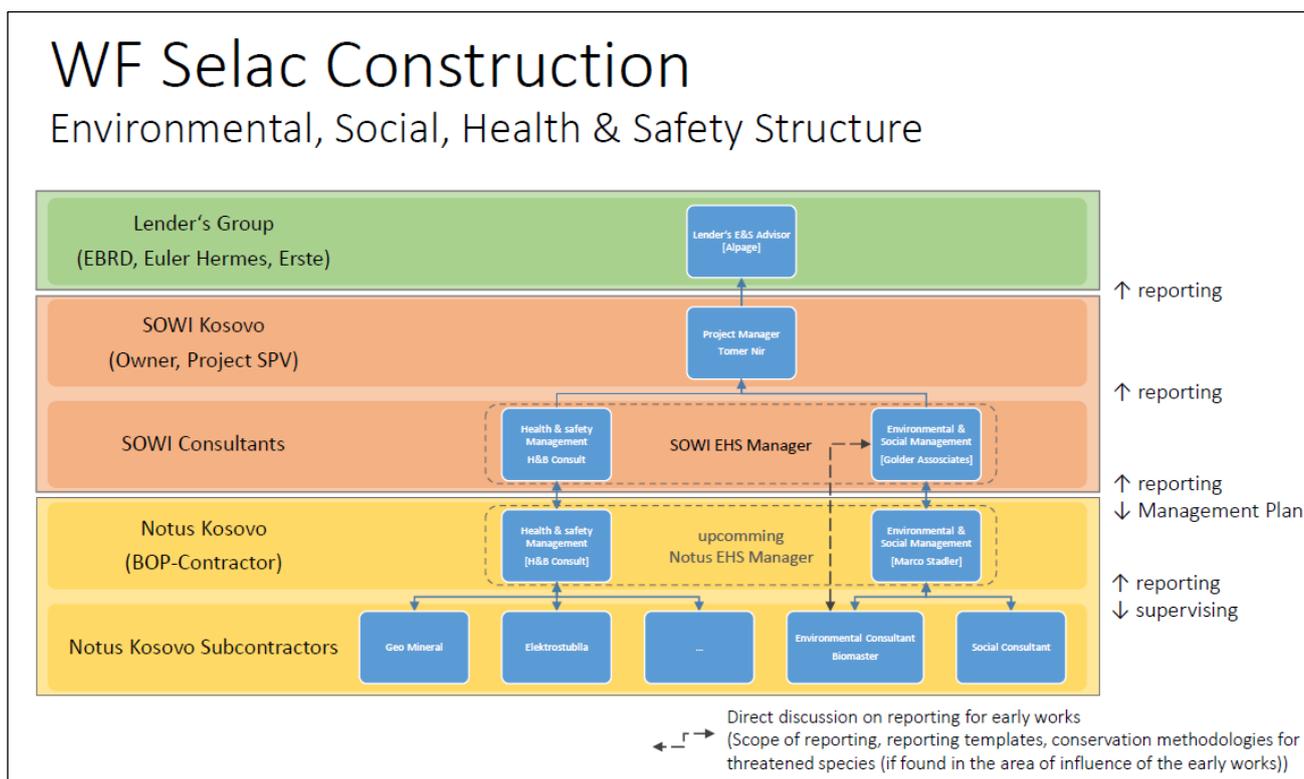


Figure 7: Selac early works organization chart

4.0 MITIGATION AND MONITORING MEASURES

This section presents the mitigation and monitoring measures that the Plan aims to implement in order to mitigate the impacts on environmental components which are related to the construction activities.

The concept of “mitigation hierarchy” (avoidance, minimization, rehabilitation/restoration, offset) is applied for the selection of the measures to limit as far as possible negative impacts to the environment.

The potential impacts deriving from the construction activities foreseen on environmental components are:

- 1) changes in local morphology and hydrology;
- 2) increased exposure to atmospheric pollutants;
- 3) interference with local traffic/vehicular incidents
- 4) increased exposure to contamination of soil and surface water;
- 5) increased exposure to anthropic noise;
- 6) habitat loss and habitat fragmentation;
- 7) increased mortality for wildlife due to site preparation and vehicular traffic;
- 8) spreading of alien species.

The following table details the environmental management and monitoring measures/actions identified for the construction activities. For each item identified, the table shows:

- Item: the identification code (ID.);
- Measure/Activity: description of the measure/activity;
- Resources: responsible for implementing the measure/activity;

- Timeline and frequency: frequency/timing of the measure/action;
- Compliance Indicator, if applicable, and related quantitative target or qualitative acceptance criteria;
- Status: implementation status of the measure/activity

This process is intended as an adaptive management system of the project, so that the mitigation and management approach will be adapted based on any new findings which could arise from the monitoring program.

Table 2: Mitigation and monitoring measures for construction activities

Item	Measure/Activity	Resources	Timeline and frequency	Compliance Indicator	Status
MM	Mitigation Measures				
MM01	Avoidance: minimising the length of internal and access roads	Internal resources	During construction activities	Final design	Ongoing
MM02	Avoidance: hunting and collection of wild animals by staff and contractors will be strictly prohibited within the Project area.	Internal resources	During construction activities	Record of internal regulation - Annual Environmental report	Not started
MM03	Minimization (increased exposure to atmospheric pollutants): <ul style="list-style-type: none"> • use of working machinery with low emissions and good levels of maintenance; • preference in the use of wheeled machines instead of crawler and with power commensurate to the intervention; • use of diesel with low sulphur content; • periodic maintenance of machinery with combustion engine; • in dry periods dirt roads and soil stock piles should be sprayed with water in order to reduce dust; • vehicle speed should be reduced on dirt road within and outside the site. 	Internal resources	During dry periods of construction activities	Record of training - Annual Environmental report	Not started

Item	Measure/Activity	Resources	Timeline and frequency	Compliance Indicator	Status
MM04	<p>Minimization (interference with local traffic/vehicular incidents):</p> <ul style="list-style-type: none"> • Speed limits will be defined and applied throughout the construction routes and legal requirement will be applied for public roads. • Visible signs, signals and flags will be placed in necessary areas and officers will be assigned to regulate the transits. Where temporary traffic signals are required (especially in the public roads), the details and locations of the signs shall be discussed with the relevant authorities. • The signs will be secured tightly in a way to prevent detachment or displacement and will be visible and understandable by all. The contractor will be responsible for checking the signs to clean and secure them whenever needed. • Whenever it is necessary to close out the roads, alternative routes will be planned and informed in advance to the authorities (including emergency service and public transport services) and the relevant local people (by means of public meetings to be organized prior to the construction) and proper signs will be placed. • Timely and in prior information through headmen ahead of the transit of heavy vehicles. • Extra measures to be taken if necessary, concerning the school nearby, as well as people involved with grazing and hunting 		During construction activities	Record of internal regulation - Annual Environmental report	Not started

Item	Measure/Activity	Resources	Timeline and frequency	Compliance Indicator	Status
MM04	<p>Minimization (increased exposure to contamination of soil and surface water):</p> <ul style="list-style-type: none"> regular maintenance of vehicles and equipment engines should be undertaken to ensure that leakages of lubricant/fuel or any other hazardous material will be avoided; refuelling of the machinery/vehicles and maintenance will be performed only on impermeable surfaces; portable spill containment and clean-up equipment on site and training in the equipment deployment will be provided; adequate materials and secondary containment systems should be provided for the fuel storage tanks and for the storage of other fluids and hazardous substances to prevent loss into the soil (e.g. the materials should be compatible with products stored for all parts of storage systems and the available volume of the secondary containments should be adequate); waste and hazardous materials should also be stored in a manner that prevents the contact between incompatible substances and allows for inspection between containers to monitor leaks or spills which could affect the soil (e.g. using physical separation such as walls or containment curbs and providing adequate spaces to allow the implementation of inspection programs to check the integrity of the storage systems). 	Internal resources	During construction activities	Record of activity - Annual Environmental report	Not started

Item	Measure/Activity	Resources	Timeline and frequency	Compliance Indicator	Status
MM05	<p>Minimization (increased exposure to anthropic noise):</p> <ul style="list-style-type: none"> • reduce trucks and vehicle speed; • maintain all vehicles and construction equipment regularly; • use of working machinery with low noise emissions; and good levels of maintenance; • limit working hours to day time as much as possible; • blasting shall be schedules to avoid sensitive hours or fauna (avoid dusk and dawn) 	Internal resources	During construction activities	Record of activity - Annual Environmental report	Not started
MM06	<p>Minimization (changes in local morphology and hydrology):</p> <p>environmental engineering techniques will be applied in order to create stable slope and minimise the risk of erosion</p>	Internal resources	During construction activities	Record of activity - Annual Environmental report	Not started
MM07	<p>Minimization (changes in local morphology and hydrology):</p> <p>culverts will be designed and constructed on the access road in line with temporary river beds or other drainage features in order to minimize the interference with local hydrology</p>	Internal resources	During construction activities	Final design – Annual Environmental report	Not started
MM08	<p>Minimization (habitat loss and habitat fragmentation):</p> <p>construction sites will be fenced or clearly delimited in order to reduce the risk of footprint creep</p>	Internal resources	During construction activities	Presence of fence	Not started

Item	Measure/Activity	Resources	Timeline and frequency	Compliance Indicator	Status
MM09	<p><u>Minimization (habitat loss and habitat fragmentation):</u> all vehicles will be driven on designated routes unless otherwise authorised</p>	Internal resources	During construction activities	Record of internal regulation - Annual Environmental report	Not started
MM10	<p><u>Minimization (habitat loss and habitat fragmentation)</u> Ecologists appointed by the Construction Contractor will perform pre-construction surveys in the areas prior to vegetation clearing. The survey will focus on threatened, protected or endemic flora species. If any flora species of concern is found within the construction footprint, the individual will be translocated to nearest safe location within a suitable habitat. Plants will be removed with a volume of soil sufficient to protect the roots and re-planted in the shortest period of time. Translocated plants will be watered according to their ecological characteristics and the success of the translocation will be monitored in the first week and month after the translocation. When present, seeds will be collected for seeding in the nearest suitable habitat.</p>	External botanist	A few days (not more than a week) before vegetation clearing and site preparation activities	Record of pre construction survey – Annual Environmental report	Not started
MM10	<p><u>Minimization (increased mortality for wildlife due to site preparation and vehicular traffic):</u> Ecologists appointed by the Construction Contractor will perform pre-construction surveys in the areas prior</p>	External wildlife expert	A few days (not more than a week) before vegetation clearing and site preparation activities	Record of pre construction survey – Annual Environmental report	Not started

Item	Measure/Activity	Resources	Timeline and frequency	Compliance Indicator	Status
	<p>to vegetation clearing. The survey will focus on fauna species and nests.</p> <ul style="list-style-type: none"> • If fauna species with limited mobility that cannot move ahead of construction are observed, they will be collected by the ecologist and translocated to undisturbed but similar sites within the LSA. • If nests are observed, the best efforts to preserve the vegetation in place will be undertaken. 				
MM11	<p><u>Minimization (increased mortality for wildlife due to site preparation and vehicular traffic):</u> speed limits and animal crossing signs will be installed and enforced on the access road and on the site roads. If necessary, speed bumps and noise stripes will also be installed on straight sections of the access road; training will be provided to all staff and contractors on road safety, and wildlife awareness</p>	internal resources	During construction activities	Record action - Annual Environmental report	Not started
MM12	<p><u>Minimization (spreading of alien species):</u> if spreading of invasive species is observed, an appropriate eradication program will be developed and implemented</p>	Internal resources with external vegetation expert	During construction activities, if needed	Record of activity - Annual Environmental report	Not started
MM13	<p><u>Minimization (habitat loss or habitat fragmentation) :</u> Monitoring of bats will occur between May and October in the project area. During this period, it will be important to minimize light pollution as light disturbs</p>	Internal resources with external bat expert	During bat monitoring activities,	Record of activity - Annual Environmental report	Not started

Item	Measure/Activity	Resources	Timeline and frequency	Compliance Indicator	Status
	<p>bats and also attracts insects which in turn attract bats. The illumination system of the camp area will be retrofitted to follow to the extent possible the Guidance note “Bats and artificial lighting in the UK – Bat Conservation Trust – Institute of lighting professionals – 2018” . In case retrofitting will not prove possible the lighting system will be switched off during the nights when monitoring will occur monitoring in the vicinity of the camp (500 m).</p>				
MM14	<p><u>Restoration (habitat loss and habitat fragmentation) :</u> Sections of the existing roads will be abandoned as the new road will follow a different path. The abandoned sections will be restored to natural vegetation by implementing the following measures:</p> <ul style="list-style-type: none"> ■ Levelling the road surface to the surrounding terrain, by means of cut and fill of the road embankment; ■ Spreading 30 cm of vegetative soil over the reclaimed road surface; ■ Sowing the reclaimed areas with a seed mixture of local species. 				

Item	Measure/Activity	Resources	Timeline and frequency	Compliance Indicator	Status
SSM	Site specific measures				
SSM1	<p>Minimization (habitat loss and habitat fragmentation - increased mortality for wildlife due to site preparation and vehicular traffic): Small springs and wetlands have been identified during the walk-over-survey along the access road at the following coordinates:</p> <ul style="list-style-type: none"> ■ Spring 3.1: 42.975120°N; 21.015219°E ■ Spring 3.2: 42.970932°N/ 21.015623°E ■ Wetland 3.1: 42.970167°N/21.015893°E ■ Wetland 3.2:42.962576° N, 21.011611°E ■ Spring 5.1 <p>The following site-specific measure will be taken at these locations:</p> <ul style="list-style-type: none"> ■ Place appropriate signage to identify the spring/wetland area and inform workers of the mitigation measures ■ Avoid excavation and dumping of material within 10 m from the external boundary of the wetland/spring; ■ Ensure hydraulic continuity for inlet and outlet of the wetland/spring crossed by the road by placing culvert of appropriate diameter; 		During construction activities,	Record of activity - Annual Environmental report	Ongoing

Item	Measure/Activity	Resources	Timeline and frequency	Compliance Indicator	Status
	<ul style="list-style-type: none"> ■ Place amphibian barriers to separate the wetland from the construction works (exact location and length to be determined by site biologist) 				
SSM2	<p>Minimization (habitat loss and habitat fragmentation): Rocky outcrops have been identified during the walk-over-survey along the access road at the following coordinates:</p> <ul style="list-style-type: none"> ■ Rocky outcrop 1.1: 42.978920°N/ 21.013383°E, ■ Rocky outcrop 2.1: 42.963971°N/ 21.014272°E ■ Rocky outcrop 2.2: 42.963827°N; 21.014714° E ■ Rocky outcrop 3.1: 42.970338°N / 21.016052° E <p>Rocky outcrops might host specific flora and fauna, including reptiles. The following site-specific measure will be taken at these locations:</p> <ul style="list-style-type: none"> ■ Place appropriate signage and visible tape at a distance of 5 m from the external boundary of the rocky outcrop to identify the area and inform workers of the mitigation measures ■ Avoid excavation and dumping of material within 5 m from the external boundary of the rocky outcrop; 		During construction activities,	Record of activity - Annual Environmental report	Ongoing

Item	Measure/Activity	Resources	Timeline and frequency	Compliance Indicator	Status
SSM3	<p>Minimization (habitat loss and habitat fragmentation - increased mortality for wildlife due to site preparation and vehicular traffic): A Mistle Thrush (<i>Turdus viscivorus</i>) and a Balckbird (<i>Turdus merula</i>) nests have been identified during the walk-over-survey along the access road at the following coordinates:</p> <ul style="list-style-type: none"> ■ Nest 3.1: 42.963854°N, 21.015020° E ■ Nest 5.1: 42.979272°N, 21.007434° E <p>The following site-specific measure will be taken at these locations:</p> <ul style="list-style-type: none"> ■ Place appropriate signage to identify the nest area and inform workers of the mitigation measures ■ Avoid cutting the tree and the vegetation surrounding it; ■ Avoid unnecessary stops of vehicles and personnel at a distance of 30 m from the nest. 		During construction activities,	Record of activity - Annual Environmental report	Ongoing
SSM4	<p>Minimization (habitat loss and habitat fragmentation - increased mortality for wildlife due to site preparation and vehicular traffic): Some ants' nests (<i>Formica rufa</i>) have been identified during the walk-over-survey along the access road at the following coordinates:</p> <ul style="list-style-type: none"> ■ Ant Nest 1.1: 42.978920°N, 21.013383°E, 		During construction activities,	Record of activity - Annual Environmental report	Ongoing

Item	Measure/Activity	Resources	Timeline and frequency	Compliance Indicator	Status
	<ul style="list-style-type: none"> ■ Ant Nest 4.1: 42.980082°N, 21.010719°E, ■ Ant Nest 4.2: 42.980278°N, 21.010651°E ■ Ant Nest 4.3: 42.980424°N, 21.010499°E ■ Ant Nest 5.1: 42.978889°N, 21.010188°E ■ Ant Nest 5.2: 42.979192°N, 21.007425°E ■ Ant Nest 5.3: 42.979036°N, 21.005017°E ■ Ant Nest 5.4: 42.978434°N, 21.010155°E ■ Ant Nest 5.5: 42.978920°N, 21.013383°E <p>The following site-specific measure will be taken at these locations:</p> <ul style="list-style-type: none"> ■ Place to be fenced with visible tape at 3 m distance from the edge of the nest ■ Avoid trampling, soil and material dumping within the delimited area; <p>Nest 4.1 should be relocated using the following precautions:</p> <ul style="list-style-type: none"> ■ An excavator with a large enough bucket to accommodate the whole nest base should be used; 				

Item	Measure/Activity	Resources	Timeline and frequency	Compliance Indicator	Status
	<ul style="list-style-type: none"> ■ The nest should be removed by sliding the excavator bucket under the base and taking care of lifting the whole mass of the nest; ■ Nest should be transported to the nearest safe location in similar habitat in the shortest period of time. ■ New location to be fenced with visible tape at 3 m distance from the edge of the nest ■ Avoid trampling, soil and material dumping within the delimited area; ■ Monitor the new site for ants' activity 				
SSM3	<p>Minimization (habitat loss and habitat fragmentation - increased mortality for wildlife due to site preparation and vehicular traffic): Individuals of Common snails (<i>Helix pomatia</i>)</p> <ul style="list-style-type: none"> ■ Position 5.1: 42.978840°N, 21.010139°E ■ Position 5.2: 42.979238°N, 21.009403°E <p>The following site-specific measure will be taken at these locations:</p> <ul style="list-style-type: none"> ■ Place appropriate signage to identify the nest area and inform workers of the mitigation measures 		During construction activities,	Record of activity - Annual Environmental report	Ongoing

Item	Measure/Activity	Resources	Timeline and frequency	Compliance Indicator	Status
	<ul style="list-style-type: none"> Check the sites before construction activities, and if some more individual are found they need to be placed outside of construction activities. 				
MO	Monitoring				
MO01	The development of the construction sites should be monitored weekly in order to avoid footprint creep within and outside the fence line.	Internal resources	Weekly during construction activities	Record of monitoring - Annual Environmental report	Not started
MO02	Monitoring of erosion and accumulation of stagnant water on construction sites and areas cleared of vegetation should be performed weekly. In case of excessive accumulation of stagnant water or erosion phenomena are observed, additional mitigation measures should be put in place as appropriate in an effective and timely manner (e.g. additional culverts on linear infrastructures, deviation channels, environmental engineering techniques for slope stability)	Internal resources	Weekly during construction activities	Record of monitoring - Annual Environmental report	Not started
MO03	Routine site inspections will be carried out to identify any possible leakages; Any accident involving spill will be registered. The results of the monitoring will be reviewed periodically	Internal resources	Weekly during construction activities	Record of monitoring - Annual Environmental report	Not started

Item	Measure/Activity	Resources	Timeline and frequency	Compliance Indicator	Status
	and additional mitigation measure will be taken if needed to contamination of soil and surface water				
MO04	Accidents involving wildlife or observations of living animal or carcasses along the access road will be registered. The results of the monitoring will be reviewed periodically and additional mitigation measure to avoid road kill will be taken if needed (e.g. fences, wildlife passages)	internal resources in consultation with external wildlife expert	During construction activities	Record of monitoring - Annual Environmental report	Not started
MO05	The presence and spread of invasive flora species will be monitored every three months during the vegetative season, with particular attention to disturbed and restored areas for at least 3 years after the end of the construction phase	Internal resources with external vegetation expert	Every three months in the vegetative season (May to November) season during construction	Record of monitoring - Annual Environmental report	Not started

5.0 AUDIT AND REVIEW

The correct implementation of this Management Plan is verified through internal inspections and audits to be carried out according to “Internal audit” requirements.

Internal auditing shall address:

- correct implementation of this Management Plan;
- correct development and implementation of specialized contractor’s plan;
- each of the point indicated in the tables in section 4.0 of this plan and in particular:
 - verification of the monitoring feasibility and location;
 - sampling activities conformities (e.g. procedures, frequencies, equipment used, data collection and field documentation, reports preparation);
 - establishment of a stakeholder network for the engagement process.

Evidences and results of the inspection and audit activities are included in the audit reports and in the “Non-Conformity and Preventive/Corrective actions” records.

Management reviews the results of inspections and audits and the progress of the Preventive/Corrective actions and takes additional appropriate actions if necessary.

During steady state operations, this Management Plan will be reviewed on an annual basis and any necessary revisions made to reflect the changing circumstances, operational needs or monitoring results. Revision of this Management Plan will be the responsibility of the HSE Manager, who is in charge of this Plan.

6.0 REPORTING

6.1 Mitigation measures reports

Evidences and results of the mitigation measures/actions (detailed in section 4.0 of this plan) have to be included in the Annual Environmental Report with the support of the specialized contractor(s); these reports have to include the following minimum information/data:

- list of the mitigation measures implemented, including the ID code, description ;
- period of the measure application (start date and end date);
- achievement (or not) of the mitigation.

6.2 Monitoring reports

Evidences and results of the monitoring measures/actions (detailed in section 4.0 of this plan) have to be included in the Annual Environmental Report with the support of the specialized contractor(s); these reports have to include the following minimum information/data:

- localization of the monitoring station (geographical coordinates in WGS84 system and elevation);
- timing of the data collection (start date and end date);
- detailed description of the methodology applied;
- the observation conducted;
- reporting any anomalies that could have affected partially or totally the results;

- quality assurance and quality control procedures applied to ensure consistency and reliability of the analyses.

6.3 Audit report

Evidences of the correct implementation of this Management Plan are collected through inspection and auditing activities .

Audit report shall give evidences of the actions, measures and related results from site inspection and auditing activities. Audit report shall also identify the corrective actions to be used in subsequent monitoring events.

Audit report for this Management Plan is issued at the end of the works.



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Bajgora Wind Project

Biodiversity Management Plan (BMP)

Submitted to:

SOWI Kosovo

Submitted by:

Golder Associates S.r.l.

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19122298/12276 Final

October 3rd, 2019



Acronyms

BIO Biodiversity

ESMS Environmental and Social Management System

EMP Environmental Management Plan

EBRD European Bank for Reconstruction and Development

IFC International Finance Corporation

KPI Key Performance Indicators

PR Performance Requirement (issued by EBRD)

PS Performance Standard (issued by IFC)

HSE Health, Safety and Environment

ESIA Environmental and Social Impact Assessment

EPC Engineering Procurement and Construction

ERP Emergency Response Plan

EU European Union

ESHS Environmental, Social Health and Safety

ESMP(s) Environmental and Social Management Plan(s)

MP Management Plan

WF Wind Farm

OHL Overhead line

GIIP Good International Industry Practice

OHSAS Occupational Health and Safety Assessment Scheme

BAT Best Available Technology

ISO International Organization for Standardization

Client:	SOWI (Solar & Wind) Kosovo
Project:	Wind Farm Selac 1, 2 and 3 located near the village of Bajgora in the municipality of Mitrovica, in Northern Kosovo. It includes 20 km connection powerline.
Facilities:	The project consists of 27 WTGs type GE 3.8-137 with a capacity of 3.83 MW with a hub height of 110 m and total capacity of 103.41 MW. The energy will be connected to the existing grid through an 110kV overhead line (OHL), having approximately 20 km length. The power line is considered part of the Project during its construction and will be considered an associated facility for the operation phase.
EPC Contractor:	NOTUS
Site Management:	All key managerial roles involved in the Construction Site management and in the windfarm operation, mainly referring to the SOWI personnel.

Table of Contents

- 1.0 PURPOSE AND SCOPE1**
- 2.0 ROLES AND RESPONSIBILITIES.....2**
- 3.0 BACKGROUND POLICIES AND STANDARDS.....4**
 - 3.1 National standards and regulation4
 - 3.2 International standards.....4
- 4.0 MITIGATION MEASURES/ACTION5**
 - 4.1 Construction5
 - 4.2 Operation.....15
- 5.0 MONITORING ACTIONS22**
 - 5.1 Construction23
 - 5.2 Operation.....25
- 6.0 AUDIT AND REVIEW.....29**
- 7.0 REPORTING29**
 - 7.1 Reporting of the monitoring activities29
 - 7.2 Reporting of the auditing activities30
 - 7.3 Self-monitoring report.....30

TABLES

- Table 1: Roles and responsibilities2
- Table 2: National standards and regulations4
- Table 3: International standards4
- Table 4: Mitigation measures/actions for construction phase7
- Table 5: Mitigation measures/actions for operation phase16
- Table 6: Monitoring actions for construction phase23
- Table 7: monitoring actions for operation phase25

1.0 PURPOSE AND SCOPE

This Biodiversity (BIO) Management Plan (MP) identifies and presents the framework and the strategy for implementing SOWI Environmental and Social Management System (ESMS) in relation to Biodiversity aspects.

It has been developed in accordance to SOWI policies, with the commitments undertaken in the ESIA, with Kosovo regulatory framework, with EBRD Environmental and Social Policy and Performance Requirements PR6 and IFC Performance Standards PS6 and IFC General and Sector Specific EHS Guidelines.

This BIO MP applies to both construction phase and operation phase of the Project. It provides also guidelines to the contractor in charge for the Engineering Procurement and Construction (EPC) activities of the Project for addressing Environmental and Social aspects according to the standards mentioned above.

Additional details related to the operation phase of the Project are expected to come in due course; it is therefore recommended that this plan is subject to a systematic review process before start of the operation in order to encompass and consider any information relevant to the BIO matters.

The Purpose of this MP is to define:

- Project standards for managing BIO matters during the construction phase;
- the scope and applicable interphases for the management of addressing BIO management and monitoring activities during the construction phase;
- responsibilities, commitments, operating procedures and instructions for the implementation of this MP;
- the mitigation measures applicable to the Project in relation to BIO aspects
- and manage the monitoring activities performance in relation to BIO aspects.

This MP applies to normal operating conditions during the construction and operation activities and does not specifically address any emergency situation. Emergencies are addressed in a specific Emergency Response Plan (ERP).

The overall objective of this MP is to identify the mitigation and monitoring measures in order to:

- adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimize and restore impacts to the environment;
- develop and implement policies, plans and procedures to integrate environmental and social aspects within the overall project management framework throughout its lifecycle;
- establish a monitor program to assess the effects of residual impacts on the environment;
- report the results of the periodic audits and provide for corrective actions, if necessary, in order to reach the planned objectives.

2.0 ROLES AND RESPONSIBILITIES

Principal roles and responsibilities for the implementation of this plan are in Table 1 outlined below.

Table 1: Roles and responsibilities

Role	Overall responsibilities	Specific responsibilities
Management	<ul style="list-style-type: none"> ■ Management will ensure sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of actions, measures and monitoring activities under SOWI's responsibility ■ This will include the selection of specialized contractor(s) for specific tasks to be carried out as part of the implementation of this Management Plan such as (but not limited to) biodiversity management surveys, monitoring activities and data analysis and reporting ■ Designating specific personnel on site or at the administrative level, clearly define their roles and responsibilities within the environmental and social management system 	<ul style="list-style-type: none"> ■ Final approval of this Management Plan and subcontractors' plans/procedures for the Project ■ Taking appropriate actions to address major Non-Conformities based on audit reports, performance monitoring reports and on SOWI HSE Manager proposed approach
HSE Manager	<ul style="list-style-type: none"> ■ Ensuring that this Plan is up to date and appropriate to the nature and scale of the Project and ensuring that this Management Plan is implemented effectively ■ Programming inspections and audit activities to ensure the correct implementation of this Management Plan; and of specialized contractor(s) tasks ■ Collecting, organizing and reviewing monitoring data and performance monitoring reports provided by the specialized 	<ul style="list-style-type: none"> ■ Ensuring that action/measures and monitoring activities directly under SOWI responsibilities are carried out timely and adequately according to this Management Plan requirements ■ Addressing Non-Conformities through the definition of Preventive/Corrective actions proposing to Management, if necessary, amendments and/or updates to this Management Plan and issuing plan revisions

Role	Overall responsibilities	Specific responsibilities
	<p>contractor(s) and providing summary results of such reports to Management, to stakeholders and to the Lenders</p>	<ul style="list-style-type: none"> ■ Bringing major Non-Conformities immediately to the attention of Management
<p>EPC contractor and subcontractors</p>	<ul style="list-style-type: none"> ■ Effective execution of the specific tasks assigned in conformity with this Management Plan and with contractual arrangements ■ Respect of EHS requirements included in the ESMS ■ Agree with the timing and logistics of the monitoring activities 	<ul style="list-style-type: none"> ■ Provide relevant monitoring data and monitoring reports to as indicated in this plan; ■ May propose changes and integrations to the monitoring activities included in the Management Plan; the proposed changes shall be evaluated and approved by HSE Manager and by Management
<p>All employees and contractors</p>	<ul style="list-style-type: none"> ■ Comply with environmental management requirements ■ Report any activities which are causing unnecessary biodiversity issues 	<ul style="list-style-type: none"> ■ Give evidence that the relevant mitigation measures identified in the current biodiversity management plan are being properly considered, implemented and monitored during execution of the works

3.0 BACKGROUND POLICIES AND STANDARDS

This section includes all those policies, standards and requirements of reference for this Management Plan that are applicable to the Project during the construction phase.

This section includes references

- to applicable national laws and regulations, including those laws implementing host country obligations under international laws and treaties;
- to the applicable international standards i.e. those issued by:
 - EBRD Performance Requirements (May 2014) and related guidance documents and EU Regulatory framework (EU Regulations and Directives).
 - IFC Performance Standards (2012) and EHS general and sector specific EHS Guidelines.

The project is expected to achieve whichever is more stringent amongst national standards and EBRD Performance Requirements (including EU Regulatory framework). The IFC General EHS Guidelines will be applicable in the absence of applicable Kosovo and EU standards.

3.1 National standards and regulation

Table 2: National standards and regulations

Kosovo Reg. Gaz. Date
Law no. 03/l-025 on environmental protection
Law no. 03/l-043 on integrated prevention pollution control
Law no.03/l–233 of nature protection
Law no. 03/l-214 on environmental impact assessment
Law no.03/l –230 on strategic environmental assessment
Law no. 03/l-160 on air protection from pollution
Law no. 04/l-174 on spatial planning

3.2 International standards

Table 3: International standards

International standards
EBRD Environmental and Social Policy and Performance Requirements (PR)
EBRD Performance Requirement 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
EBRD: Guidance Note: Performance Requirement 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

International standards
Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (Habitat Directive)
Council Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (Bird Directive)
IFC Performance Standards (PS) and Guidance Notes (GN)
IFC PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
IFC Guidance Note 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources (2019)
IFC General EHS Guidelines: § 4 Construction and Decommissioning § 4.1 Environment
IFC Industry Sector Guidelines - EHS Guidelines for Wind Energy: § 1.1-1.1.3-2.1.4
IFC Industry Sector – EHS Guidelines: for Electric Power Transmission and Distribution

4.0 MITIGATION MEASURES/ACTION

4.1 Construction

Based on the ESIA the potential impacts on environmental components deriving from BIO management during the construction phase are:

- 1) vegetation and topsoil removal;
- 2) changes in local hydrology;
- 3) increase in vehicular traffic;
- 4) emission of noise and vibration;
- 5) introduction and spreading of alien species.

The following table details the environmental management and mitigation measures/actions identified for BIO management activities during construction phase. For each measure/action identified, the table shows:

- Item: the identification code of the mitigation measure/actions (ID.);
- Measure/Actions: description of the mitigation measure/ actions;
- Source document: is the reference to one or more applicable standard (i.e. National Regulation and Permits, EBRD Performance Requirements and related EU Regulations/Directives, IFC PS/Guidelines, or other GIIP);
- Timeline and frequency: frequency/timing of the measure/action;
- KPI (Key performance indicator): quantitative compliance indicator or qualitative acceptance criteria that can be used to verify the actual effectiveness of the mitigation measure/actions;
- Responsibility: resource responsible for implementing the measures/actions;

- WF/OHL: indication whether the measure/action is applicable to the Wind Farm (WF) and/or Overhead Line (OHL)

The aim of the “mitigation hierarchy” (avoidance, minimization, rehabilitation/restoration, offset) is applied for the selection of the measures to limit as far as possible negative impacts to the environment.

This process is intended as an adaptive management system of the project, so that the mitigation and management approach will be adapted based on any new findings which could arise from the monitoring program described in the following section.

Table 4: Mitigation measures/actions for construction phase

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
BIO01	<p><u>Avoidance: micro-siting of project facilities</u></p> <ul style="list-style-type: none"> The project area of influence is characterized by different levels of degradation. The project will explore the possibility to locate project facilities, particularly the temporary facilities, in the areas with higher degradation. 	EBRD PR6 IFC PS6	During the detailed engineering phase	Final placement of project facilities.	Specialized contractors	WF
BIO02	<p><u>Minimization: pre-construction surveys - fauna</u></p> <ul style="list-style-type: none"> Before the beginning of site preparation (vegetation clearing and topsoil removal) an expert wildlife ecologist will perform pre-construction surveys in the areas to be cleared (no more than 7 days before). The survey will focus on fauna species with limited mobility that cannot move ahead of construction (e.g. reptile and amphibians). <p>If any of these species are observed, they will be collected by the ecologist and translocated to undisturbed but similar sites within the LSA.</p> <ul style="list-style-type: none"> Specific additional pre-construction surveys will be performed within the WF targeting birds and bats determining PBF and CH by an expert ecologist targeting nests and roosts. <p>Similar surveys will also be conducted along the OHL for <i>Circaetus gallicus</i>. If nests or maternity roosts are found within 100m from the planned construction sites, the construction activities will be postponed until the young are able to leave the nest/roost.</p>	EBRD PR6 IFC PS6	Before the beginning of site preparation (vegetation clearing and topsoil removal)	Fauna pre-construction survey performed in all areas to be developed	HSE Manager Specialized contractor(s)	WF OHL

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
BIO03	<p><u>Minimization: pre-construction surveys - flora</u></p> <p>Before the beginning of site preparation (vegetation clearing and topsoil removal) an expert botanist will perform surveys of the flowering period of the species identified as triggering CH and PBF in the areas to be cleared of vegetation and its immediate surroundings.</p> <p>The data regarding date, location, population extension and number of individuals will be recorded.</p>	EBRD PR6 IFC PS6	Before the beginning of site preparation (vegetation clearing and topsoil removal)	Flora pre-construction survey performed in all areas to be developed	HSE Manager Specialized contractor(s)	WF OHL
BIO04	<p><u>Minimization: flora on-site conservation</u></p> <p>Conservation of flora species determining CH and PBF, situated in the vicinity of the Project (100 m) shall be guaranteed. These areas will be by clearly identified both on the maps and in the field as exclusion zone where soil and vegetation will be preserved, and access will not be permitted.</p> <p>According to the distribution area determined by Biomaster Ltd. during 2018 surveys within the WF:</p> <ul style="list-style-type: none"> - <i>Daphne blagayana</i>, above WTG 14 and between WTG 18 and 20. - <i>Senecio procerus</i> to the right of WTG20. - <i>Gentianella bulgarica</i> below WTG 21 and near the S11 deposit area. - <i>Echium russicum</i> below WTG 21, within the S11 deposit area between WTG 10 and 11. <p>Demarcation could be provided by highly visible wooden sticks (50 cm high) planted into the ground and /or flagging tape, while a more</p>	EBRD PR6 IFC PS6	Before the beginning of site preparation (vegetation clearing and topsoil removal)	Protection of all populations that might be indirectly affected by the project	HSE Manager Specialized contractor(s)	WF OHL

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<p>permanent fencing should be provided in areas subject to higher risk of disturbance because situate closer to active sites or downhill from ground preparation.</p> <p>If spreading of invasive species is observed, an appropriate eradication program will be developed and implemented.</p>					
<p>BIO05</p>	<p><u>Minimization: flora salvaging</u></p> <p>Flora individuals belonging to flora species determining CH and PBF, directly impacted by the project shall be identified, salvaged prior to construction and directly translocated to the appropriate sites.</p> <p>The flagging of individuals to be translocated will take place preferably during the flowering season of the species. The translocation of individuals will be preferably performed during the dormant stage in order to minimize stresses to the plant.</p> <p>The data regarding date, location, source populations and number of individuals collected and translocated will be recorded.</p> <p>A Salvaging and Translocation Plan will be prepared based on the construction schedule. Collection and translocation techniques and suitable translocation sites will also be identified within the Plan.</p> <p>According to the distribution area determined by Biomaster Ltd. during 2018 surveys within the WF:</p> <ul style="list-style-type: none"> - <i>Daphne blagayana</i>, above WTG 14 and between WTG 18 and 20. - <i>Senecio procerus</i> to the right of WTG20. 	<p>EBRD PR6 IFC PS6</p>	<p>Before the beginning of site preparation (vegetation clearing and topsoil removal)</p>	<p>Salvaging of all populations directly affected by the project</p>	<p>HSE Manager Specialized contractor(s)</p>	<p>WF OHL</p>

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> - <i>Gentianella bulgarica</i> below WTG 21 and near the S11 deposit area. - <i>Echium russicum</i> below WTG 21, within the S11 deposit area between WTG 10 and 11. 					
BIO06	<p><u>Minimization: footprint creep</u></p> <ul style="list-style-type: none"> ■ On- site conservation areas for natural habitats adjacent to Project sites will be protected from unintentional disturbance during construction. Temporary demarcation could be provided by highly visible wooden sticks (50 cm high) planted into the ground and /or flagging tape, while a more permanent fencing could be provided in areas of particular sensitivity (e.g. wetlands) or subject to higher risk of disturbance. In this case appropriate signage will be installed to make the area recognisable by operators and to comply with H&S regulations and plans. ■ Vehicle movement will be restricted to the existing roads that connect the Project site with the surrounding areas. Off road driving will be prohibited in order to avoid any unnecessary disturbance of natural vegetation. 	EBRD PR6 IFC PS6	During construction phase	<p>No signs of footprint creep outside planned construction areas</p> <p>No signs of off-road driving</p>	HSE Manager All employees and contractors	WF OHL
BIO07	<p><u>Minimization: management of stormwater and erosion</u></p> <ul style="list-style-type: none"> ■ Stormwater flow will be managed and the presence of stagnant water within and around the construction areas will be avoided through the use of culverts/channels as appropriate. 	EBRD PR6 IFC PS6	During construction phase	No sign of erosion or flooded areas around the construction site	HSE Manager	WF

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> <li data-bbox="275 371 1050 735">■ The springs identified during the ongoing fieldwork have been mapped and considered for fencing, thus during construction phase surveys, the risk of outflow will be identified and minimum viable flow (sensu EU Water framework) will have to be kept. Of the 40 natural springs identified, 2 (SP27, SP36) are directly impacted by the WF footprint, while 8 (SP05, SP06, SP07, SP11, SP19, SP25, SP31, SP33) are indirectly impacted within a 100m buffer and others sixteen natural springs are indirectly impacted within a 300m buffer. <li data-bbox="275 767 1050 906">■ Domestic wastewater will be treated in package wastewater treatment plant. No water will be discharged. Chemical toilets will be provided to workers and periodically emptied under a safe protocol. <li data-bbox="275 938 1050 1042">■ Changes in surface water quality, mainly due to dust from blasting or morphological changes, will be managed by keeping blasting sites as far as possible from water sources. <li data-bbox="275 1074 1050 1326">■ If erosion phenomena are observed environmental engineering techniques will be put in place to stop the erosion and ensure soil protection and the development of natural vegetation. Environmental engineering techniques will include as appropriate: erosion control mat, live crib wall, rock mattresses, hydro seeding, afforestation with appropriate species etc. 					

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
<p>BIO08</p>	<p><u>Minimization: wildlife management</u></p> <ul style="list-style-type: none"> ■ Hunting and collection of wild animals, and in particular of <i>Testudo hermanni</i> (Hermann's tortoise) by employees and contractors will be strictly prohibited within the Project area. ■ Feeding of wildlife or stray cats and dogs will be prohibited on-site and organic waste will be carefully managed and disposed in order to avoid attraction of wildlife or stray cats and dogs. ■ The speed of the vehicles on site should be limited and the use of construction vehicles at night should be avoided in order to minimize the risk of traffic collisions with fauna. ■ Care will be taken to select machines and equipment with low noise emissions. ■ Rock blasting activities will be performed during the day time and at regular times to facilitate local fauna habituation to noise and avoid disturbance during critical hours for many species (dusk and dawn). ■ Night works will be avoided (from 8 pm to 6 am at least) to reduce impacts to nocturnal fauna species, especially bats. ■ If fauna species are encountered employees and contractors will wait until it moves on by itself or they will ask the assistance of the Environmental technician for its safe removal and relocation in a suitable environment. 	<p>EBRD PR6 IFC PS6</p>	<p>During construction phase</p>	<p>Full implementation of all wildlife management actions within and around project construction sites</p>	<p>HSE Manager All employees and contractors</p>	<p>WF OHL</p>

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
BIO09	<p><u>Minimization: noise and vibrations</u></p> <ul style="list-style-type: none"> ■ care will be taken to select machines and equipment with low noise emissions; ■ night works will be avoided (from 8 pm to 6 am at least) to reduce impacts to nocturnal fauna species, especially bats; ■ rock blasting activities will be performed during daytime and at regular times to enhance local fauna habituation to noise and to avoid disturbance during critical hours for many species (dusk and dawn). 	EBRD PR6 IFC PS6	During construction phase	Full implementation of all noise management actions within and around project construction sites	HSE Manager All employees and contractors	WF OHL
BIO10	<p><u>Minimization: employs awareness</u></p> <p>Awareness among employees and contractor working on site about the protected species/habitats potentially present in the area will be developed, in order to ensure constant monitoring and promote actions to be taken if wildlife is encountered</p>	EBRD PR6 IFC PS6	During construction phase	Training of all employees and subcontractors on the presence of conservation areas on site and how to behave in case of wildlife encounter	HSE Manager	WF OHL
BIO11	<p><u>Rehabilitation/Restoration:</u></p> <p>Areas cleared during construction for temporary use will be progressively restored as soon as possible, with the goal of producing a stable vegetative cover to minimize erosion, dust and spreading of invasive alien species. Restoration of areas cleared</p>	EBRD PR6 IFC PS6	At the end of the construction phase	Restore all areas temporarily used during construction	HSE Manager Specialized contractor(s)	WF OHL

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<p>during construction but not subject to the placement of permanent facilities (deposit areas and storage areas) will be carried out,.</p> <p>Vegetation and topsoil restoration activities will be performed in the Wind Farm on all 8 storage areas in order to restore their original habitat, while all 5 deposit areas will be restored as mountain pasture (E1.7).</p> <p>Access roads to the OHL will be restored at the end of the construction phase to their previous habitat.</p>					

4.2 Operation

Based on the ESIA the potential impacts on environmental components deriving from BIO management during the construction phase are:

- 1) presence of new buildings/infrastructures;
- 2) changes in local hydrology;
- 3) emission of noise and vibration;
- 4) emission of light.

The following table details the environmental management and mitigation measures/actions identified for BIO during the operation phase. For each measure/action identified, the table shows:

- Item: the identification code of the mitigation measure/actions (ID.);
- Measures/Actions: description of the mitigation measures/ actions;
- Source document: is the reference to one or more applicable standard (i.e. National Regulation and Permits, EBRD Performance Requirements and related EU Regulations/Directives, IFC PS/Guidelines, or other GIIP);
- Timeline and frequency: frequency/timing of the measure/action;
- KPI (Key performance indicator): quantitative compliance indicator or qualitative acceptance criteria that can be used to verify the actual effectiveness of the mitigation measure/actions;
- Responsibility: resource responsible for implementing the measures/actions;
- WF/OHL: indication whether the measure/action is applicable to the Wind Farm (WF) and/or Overhead Line (OHL)

The aim of the “mitigation hierarchy” (avoidance, minimization, rehabilitation/restoration, offset) is applied for the selection of the measures to limit as far as possible negative impacts to the environment.

This process is intended as an adaptive management system of the project, so that the mitigation and management approach will be adapted based on any new findings which could arise from the monitoring program described in the following section.

Table 5: Mitigation measures/actions for operation phase

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
BIO12	<p><u>Minimization: flora on-site conservation</u></p> <p>Conservation of flora species determining CH and PBF, situated in the vicinity of the Project (100 m) shall be guaranteed including translocation areas. These areas will be protected during the operation phase by impacts other than the Project such as grazing, trampling and off-road driving. If necessary, the populations will be fenced.</p>	EBRD PR6 IFC PS6	Before the beginning of site preparation (vegetation clearing and top soil removal)	Protection of all populations that might be indirectly affected by the project	HSE Manager Specialized contractor(s)	WF OHL
BIO13	<p><u>Minimization: Emission of noise and vibration</u></p> <p>During regular operation and maintenance, keep selecting and using machines and equipment with low noise emissions (e.g. suitable mufflers on engine exhausts and compressor components; machines and equipment with low noise emissions).</p>	EBRD PR6 IFC PS6	During operation phase	No excessive noise due to poor maintenance conditions	HSE Manager All employees and contractors	WF OHL
BIO14	<p><u>Minimization: management of stormwater and erosion</u></p> <p>Maintain a suitable stormwater drainage network in correspondence to access roads, wind turbines, temporary storage/deposit areas and other relevant construction areas. Stormwater from the drainage network must be channelled to secondary hydrographic network or other suitable drainage feature and discharged in a controlled way. Appropriate measures must be adopted to protect discharge points and channels from erosion.</p>	EBRD PR6 IFC PS6	During operation phase	No sign of erosion or flooded areas around the construction site	HSE Manager	WF

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
<p>BIO15</p>	<p><u>Minimization: wildlife management</u></p> <ul style="list-style-type: none"> ■ Hunting and collection of wild animals, and in particular of <i>Testudo hermanni</i> (Hermann's tortoise) by employee and contractors will be strictly prohibited within the Project area. ■ Avoid attracting wildlife by periodical removal of carcasses from the ground is key; appropriate garbage management and disposal, elimination of stagnant water. ■ Feeding of wildlife or stray cats and dogs will be prohibited on-site and organic waste will be carefully managed and disposed in order to avoid attraction of wildlife or stray cats and dogs. ■ The speed of the vehicles on site should be limited and the use of vehicles at night should be avoided in order to minimize the risk of traffic collisions with fauna. ■ During regular operation and maintenance, keep selecting and using machines and equipment with low noise emissions (e.g. suitable mufflers on engine exhausts and compressor components; machines and equipment with low noise emissions). ■ While respecting the national prescriptions it is recommended to keep the number of light sources to the minimum. ■ All lights should flash synchronously, lights should flash at around 3 seconds frequency. 	<p>EBRD PR6 IFC PS6</p>	<p>During operation phase</p>	<p>Full implementation of all wildlife management actions within and around project construction sites</p>	<p>HSE Manager All employees and contractors</p>	<p>WF OHL</p>

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> ■ Preferred types of light in exterior lighting (e.g: lights on site due to security reasons) applications are: <ul style="list-style-type: none"> – Low pressure sodium lamps (SOX): orange lamps seen along roadsides – Light emitting diodes (LEDs): light source of choice, emitted more directional, warmer colour temperatures (~ 3000°K), – lights triggered by presence detectors, and lights oriented to the ground. ■ The following types of lights should be avoided: <ul style="list-style-type: none"> – mercury lamps (MBF): bluish-white lamps (attract insects and tolerant bat species) – high pressure sodium lamps (SON): brighter pinkish-yellow lamps; used as road lighting <p>If fauna species are encountered employees and contractors will wait until it moves on by itself or they will ask the assistance of the Environmental technician for its safe removal and relocation in a suitable environment.</p>					
<p>BIO16</p>	<p><u>Minimization: birds and bats management</u></p> <ul style="list-style-type: none"> ■ Turbines and infrastructures will not offer perching or breeding opportunities for birds and bats. ■ Free-wheeling i.e. free spinning of rotors under low wind conditions with no power generation, will be eliminated; 	<p>EBRD PR6 IFC PS6</p>	<p>During operation phase</p>	<p>Full implementation of all wildlife management actions within and around project construction sites</p>	<p>HSE Manager All employees and contractors</p>	<p>WF</p>

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> ■ A minimum of 10 aluminium nest boxes will be installed on the pylons of the OHL in suitable habitats. This will offer breeding opportunities for new pairs of Common Kestrel in order to compensate for the potential loss of the population at Bajgora. The nests will be located at least at 5 km distance from the turbines. ■ For all turbines the cut-in wind speed will be set to 5 m/s from sunset to sunrise for two year according to the following scheme: <ul style="list-style-type: none"> ■ from 1st May to 30th September; ■ from 1st to 30th April and from 1st to 31st October only with temperature above 6°C; ■ Turbine specific cut-in wind speed mitigation measures will be proposed, if necessary, after the first year of monitoring of bat activity and correlation with meteorological parameters (wind, temperature and precipitation). The measures will be reassessed after each year based on the new information collected. 					
<p>BIO17</p>	<p><u>Minimization: birds and bats management</u></p> <p>In order to minimize the risk of collision, the main aim is to make lines more visible to birds, since the assumption is that birds collide with overhead cables because they cannot see them (AEWA, 2012). Such measure is particularly needed in case of potential flying corridors such as the River Sitnica. In</p>	<p>EBRD PR6 IFC PS6</p>	<p>During operation phase</p>	<p>Full implementation of all wildlife management actions within and around project construction sites</p>	<p>HSE Manager All employees and contractors</p>	<p>OHL</p>

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<p>this portion of the powerline line markers need to be installed on the earth wire (also called ground or shield wire) according to the following best practice measures suggested below.</p> <ul style="list-style-type: none"> ■ Line markers should be as large as possible, and increase the visible thickness of the line by at least 20 cm, for a length of at least 10-20 cm. ■ Spacing of devices should be not more than 5-10 m apart. ■ Line markers should incorporate as much contrast with relevant backgrounds as possible, colour is probably less important than contrast. ■ Movement of the device and markers that protrude vertically both above and below the cable are likely important. ■ Since it is suspect that many collisions may occur at night, devices that are nocturnally visible (phosphorescence, ultraviolet radiation and other means) would be advantageous. 					
<p>BIO18</p>	<p><u>Minimization: employees awareness</u></p> <p>Awareness among employees and contractor working on site about the protected species/habitats potentially present in the area will be developed, in order to ensure constant monitoring and promote actions to be taken if wildlife is encountered</p>	<p>EBRD PR6 IFC PS6</p>	<p>During operation phase</p>	<p>Training of all employees and subcontractors on the presence of conservation areas on site and how to</p>	<p>HSE Manager</p>	<p>WF OHL</p>

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
				behave in case of wildlife encounter		
BIO19	<p><u>Minimization: bats additional conservation measures</u></p> <p>Additional conservation measures for bats species will be developed in case the results of monitoring of bats mortality will show significant effects, defined as a mortality above 2 individuals/turbine/year. These measures might include support to bats conservation off-site like roots protection and enhancement, and awareness raising at the local and national level in cooperation with local qualified NGOs.</p>	EBRD PR6 IFC PS6	To be determined	Depending on the measures	HSE Manger	WF

5.0 MONITORING ACTIONS

The following table details the monitoring actions identified for BIO management activities during the construction and operation phase. The aim of the monitoring actions is to verify whether the residual impacts are under control and the mitigation measures/action have been effective.

For each monitoring measure/action identified, the table shows:

- Item: the identification code of the monitoring activity (ID.);
- Monitoring Activity: description of the monitoring activity;
- Source document: is the reference to one or more applicable standard or limit value (i.e. National Regulation and Permits, EBRD Performance Requirements and related EU Regulations/Directives, IFC PS/Guidelines, or other GIIP);
- Timeline and frequency: frequency/timing of the monitoring activity;
- KPI (Key performance indicator): regulatory limit value or qualitative acceptance criteria to comply with;
- Responsibility: resource responsible for implementing the monitoring activity;
- WF/OHL: indication whether the measure/action is applicable to the Wind Farm (WF) and/or Overhead Line (OHL)

5.1 Construction

Table 6: Monitoring actions for construction phase

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
BIO20	<p><u>Minimization: flora conservation</u></p> <p>On-site Conservation Areas identified for flora species shall be monitored periodically and any signs of direct or indirect disturbance will be noted (e.g. trampling, dust deposition, soil erosion, presence of stagnant water).</p> <p>A monitoring register will be filled in and photographic documentation will be collected at each monitoring and shared with the Specialized Contractor(s).</p>	EBRD PR6 IFC PS6	Monthly during the entire construction phase	Effective protection of all populations direct/indirect impacts	HSE Manager Specialized contractor(s)	WF OHL
BIO21	<p><u>Minimization: flora salvaging</u></p> <p>Flora translocation sites identified for flora species determining PBF and CH shall be monitored periodically for any sign of stress or disturbance.</p> <p>A monitoring register will be filled in and photographic documentation will be collected at each monitoring and shared with the Specialized Contractor(s)</p>	EBRD PR6 IFC PS6	Monthly during the entire construction phase	Creation of new self-sustaining and stable populations	HSE Manager Specialized contractor(s)	WF OHL
BIO22	<p><u>Minimization: wildlife management</u></p> <p>Accidents involving wildlife or the observation of live animal or carcasses along the access road or on the construction site will be recorded.</p> <p>Additional mitigation measures to discourage wildlife presence on site and avoid roadkill will be taken if needed.</p>	EBRD PR6 IFC PS6	During the entire construction phase Reports of incidents/observations to be presented every 3 months	No accidents involving wildlife or the observation of carcasses Register of wildlife observations from employees/contractors	HSE Manager All employees and contractors	WF OHL

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
BIO23	<p><u>Minimization: bats management</u></p> <p>Bats activity will be monitored on all turbines during construction using Static Acoustic Monitoring with the same methodology used during the baseline study on a selection of turbine sites in all three sectors of the Project.</p>	EBRD PR6 IFC PS6 Eurobats	Six months during 2020	Bats monitoring survey results	HSE Manager, Biodiversity contractors	WF
BIO24	<p><u>Minimization: birds management</u></p> <p>Bird survey with the Vantage Point technique will be repeated for the breeding season in 2020 (60 h for each Vantage Point from March - August). This will allow to verify if the intense kestrel presence observed in 2019 is regular or not in the area.</p>	EBRD PR6 IFC PS6 SNH 2017	Six months during 2020	Vantage points survey results	HSE Manager, Biodiversity contractors	WF
BIO25	<p><u>Footprint creep and hydrology/ erosion management</u></p> <p>Indirect and direct inadvertent impacts on natural habitats present around the construction site will be monitored monthly in order to assess eventual footprint creep outside designated areas, signs of erosion or stagnant water accumulation, functioning of the water run-off management system, dust deposition on vegetation, presence of waste or hazardous substances spill</p>	EBRD PR6 IFC PS6	Monthly during the entire construction phase	No direct/ indirect impact outside project footprint	HSE Manager	WF OHL
BIO26	<p><u>Rehabilitation/Restoration:</u></p> <p>After restoration areas should be monitored to ensure the correct development of the seeded or planted species and recolonization of natural vegetation.</p>	EBRD PR6 IFC PS6	Every three months during the vegetative season (from April to	Restored areas with vegetation cover and composition similar to undisturbed areas	HSE Manager Specialized contractor(s)	WF OHL

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	Presence and spreading of invasive flora species within and around the construction site will be monitored every three months during the vegetative season (from April to September) by an expert botanist, if necessary, extirpation campaign will be put in place in order to avoid the spreading of the invasive species.		September) for the first three years after restoration			

5.2 Operation

Table 7: monitoring actions for operation phase

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
BIO27	<p><u>Minimization: flora conservation</u></p> <p>On-site Conservation Areas identified for flora species shall be monitored periodically and any signs of direct or indirect disturbance will be noted (e.g. trampling, dust deposition, soil erosion, presence of stagnant water).</p> <p>A monitoring register will be filled in and photographic documentation will be collected at each monitoring and shared with the Specialized Contractor(s)</p>	EBRD PR6 IFC PS6	Monthly during the entire operation phase	Effective protection of all populations direct/indirect impacts	HSE Manager Specialized contractor(s)	WF OHL
BIO28	<p><u>Minimization: flora salvaging</u></p>	EBRD PR6 IFC PS6	Monthly during the first year of transplantation and after every 3	Creation of new self-sustaining and stable populations	HSE Manager Specialized contractor(s)	WF OHL

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<p>Flora translocation sites identified for flora species determining PBF and CH shall be monitored periodically for any sign of stress or disturbance.</p> <p>A monitoring register will be filled in and photographic documentation will be collected at each monitoring and shared with the Specialized Contractor(s)</p>		months for the following 5 years			
BIO29	<p><u>Wildlife management and awareness</u></p> <p>Accidents involving wildlife or the observation of live animal or carcasses along the access road or on the construction site will be recorded.</p> <p>Additional mitigation measures to discourage wildlife presence on site and avoid roadkill will be taken if needed.</p>	EBRD PR6 IFC PS6	During the entire operation phase Reports of incidents/observations to be presented every 3 months	<p>No accidents involving wildlife or the observation of carcasses</p> <p>Register of wildlife observations from employees/contractors</p>	HSE Manager All employees and contractors	WF OHL
BIO30	<p><u>Birds management</u></p> <p>Common Kestrel nest boxes installed on the OHL will be monitored for occupancy and breeding success for the first 5 years to assess impact of compensation measure.</p>	EBRD PR6 IFC PS6	During the first 2 years of operation phase	<p>Report of the survey</p> <p>Presence of nesting Common Kestrel</p>	HSE Manager All employees and contractors	
BIO31	<p><u>Bats management</u></p> <p>Bats activity will be monitored on a representative selection of turbines for two years. A recording device of bats calls called Batcorders (https://ecoobs.com/products/hardware/gsm-</p>	EBRD PR6 IFC PS6 Eurobats	During the first 2 years of operation phase	<p>Survey reports</p> <p>Calculation of specific algorithms cut-in wind speeds</p>	HSE Manager All employees and contractors	

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<p>batcorder/) will be installed on all nacelles and operated every day from sunset to sunrise from April 1st to October 31st with the following settings: quality 20, threshold -36 dB, posttrigger 200 ms, and critical frequency 16 kHz. Temperature and a precipitation sensor should also be installed</p> <p>Recorded acoustic sequences will be analyzed by bcAdmin software (https://ecoobs.com/download-en/; Call filter: Amplitude threshold 1.585, smoothness 2.00, Samples Hi 200, Min. call distance 15 ms, Min. call length 1.50 ms; Call Extraction: Min call interruption 1.10 ms, Forward MSE 0.060, Samples for regr. 8, Regression size 200 µs) and by Discriminator (Ver. 1.13, ecoObs; in combination with R 2.7.2 (R Core Team 2015) and the packages kernlab and RandomForest) to automatically identify bat calls in the batcorder recordings and also to identify species and species groups.</p> <p>The data collected during the two years of monitoring will be analysed with the software-tool ProBat (available in German and English from: http://windbat.techfak.fau.de) in order to estimate fatality rates, and calculates specific algorithms cut-in wind speeds for each turbine based on acoustic activity data and wind speed to maintain an acceptable possible mortality of less than 2 dead bats per turbine (Behr et al., 2017).</p>			<p>for each turbine to maintain an acceptable possible mortality of less than 2 dead bats per turbine</p>		
<p>BIO32</p>	<p><u>Bats management</u></p>	<p>EBRD PR6 IFC PS6</p>	<p>During the first 2 years of operation phase</p>	<p>Results of the carcass survey</p>	<p>HSE Manager</p>	

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<p>A carcass monitoring will be organized to understand the effects of the wind farm over bats species. The monitoring will be organized in line with good international practice and will involve all turbines.</p>	Eurobats			Biodiversity contractors	
BIO33	<p><u>Invasive species</u> Presence and spreading of invasive flora species within and around the construction site will be monitored every three months during the vegetative season (from April to September) by an expert botanist, if necessary, extirpation campaign will be put in place in order to avoid the spreading of the invasive species.</p>	EBRD PR6 IFC PS6	Monthly during the entire operation phase	No spreading of invasive species	HSE Manager	WF OHL
BIO34	<p><u>Rehabilitation/Restoration:</u> The rehabilitation of dumping areas and storage areas presence will be monitored every three months during the vegetative season (from April to September) in order to ensure the correct re-vegetation of the area and intervene in a timely manner in case of signs of erosion. Presence and spreading of invasive flora species within and around the construction site will be monitored every three months during the vegetative season (from April to September) by an expert botanist, if necessary, extirpation campaign will be put in place in order to avoid the spreading of the invasive species.</p>	EBRD PR6 IFC PS6	Every three months during the vegetative season (from April to September) for the first three years after restoration	Restored areas with vegetation cover and composition similar to undisturbed areas	HSE Manager Specialized contractor(s)	WF OHL

6.0 AUDIT AND REVIEW

The correct implementation of this Management Plan is verified through internal inspections and audits to be carried out according to the requirements included in section “Internal audit” of the “ESMS Manual” and in the “Audit and Non-Conformities Procedure”.

The schedule, the frequency, the scope and objectives of the audit as well as the responsible internal auditors are indicated in the Audit Program that is developed and updated by SOWI.

Internal auditing shall address:

- the correct implementation of this Management Plan
- the correct development and implementation of Contractor’s Plan
- the correct and timely implementation of an auditing and review system by the Contractor
- each of the points indicated in the tables in section 4.0 (mitigation measures/actions) and 5.0 (monitoring activities) of this plan
- the establishment of a stakeholder engagement process related to the aspects addressed by this Management Plan.

Evidences and results of the inspection and audit activities are included in the audit reports and in the “Non-Conformity and Preventive/Corrective actions” records.

SOWI Management reviews results of inspections and audits and the progress of the Preventive/Corrective actions and takes additional appropriate actions if necessary, according to the indications included in section 7 “Management Review” of the ESMS Manual.

During steady state operations, this Management Plan will be reviewed on an annual basis and any necessary revisions made to reflect the changing circumstances, operational needs or monitoring results. Revision of this Management Plan will be the responsibility of the HSE Manager, who is in charge of this Plan.

7.0 REPORTING

This section provides instructions and requirements for the reporting related to mitigation measures/actions, to monitoring activities and to internal auditing.

7.1 Reporting of the monitoring activities

Evidences and results of the monitoring activities (detailed in section 5.0) must be described in detail in appropriate monitoring reports. These monitoring reports must include the following minimum information/data (where relevant):

- analytical certificates from the laboratory/ies;
- localization of the monitoring activities (geographical coordinates in WGS84 system and elevation);
- timing of the data collection (start date and end date);
- description of the applied methodology;
- KPI (Key performance indicator): regulatory limit value or qualitative acceptance criteria to comply with;
- the responsibility for implementing the specific monitoring activities (including reference to this Management Plan and reference to the appointment of third parties eventually contracted to perform part of the activity (e.g. external laboratories and consultants);

- conclusions on compliance vs. KPI and eventual observations;
- quality control procedures applied to ensure consistency and reliability of the analyses or results.

7.2 Reporting of the auditing activities

The correct implementation of this Management Plan must be verified through internal audits to be carried out according to the requirements included in the “ESMS Manual”, the internal auditing procedure and section 6.0 “Audit and review” of this Management Plan.

Evidences of the implementation of the mitigation measures/actions (detailed in section 4.0), of the timely deployment of monitoring activities (detailed in section 5.0) and of related results are described in the audit reports. These audit reports must include the following minimum information/data:

- list of the items audited (detailed in sections 4.0 and 5.0);
- information whether the items have been implemented within the indicated timeline and frequency;
- achievement (or not) of the KPIs;
- description of non-compliances eventually identified.

7.3 Self-monitoring report

Monitoring data together with the results of the audit activities will be summarized in a Self-Monitoring Report on a quarterly basis that will be provided every quarter to the Lenders and eventually to stakeholders as further described in the “ESMS Manual”.



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Bajgora Wind Project

Community Health & Safety Environmental Management Plan (CHS MP)

Submitted to:

SOWI Kosovo

Submitted by:

Golder Associates S.r.l.

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19122298/12268 Final

October 3rd, 2019



Acronyms and Definitions

CHS Community Health & Safety

ESMS Environmental and Social Management System

EBRD European Bank for Reconstruction and Development

IFC International Finance Corporation

KPI Key Performance Indicators

PR Performance Requirement (issued by EBRD)

PS Performance Standard (issued by IFC)

HSE Health, Safety and Environment

ESIA Environmental and Social Impact Assessment

EPC Engineering Procurement and Construction

ERP Emergency Response Plan

EU European Union

ESHS Environmental, Social Health and Safety

ESMP(s) Environmental and Social Management Plan(s)

MP Management Plan

WF Wind Farm

OHL Overhead line

GIIP Good International Industry Practice

OHS Occupational Health and Safety

BAT Best Available Technology

ISO International Organization for Standardization

Client:

SOWI (Solar & Wind) Kosovo L.L.C.

Project:

Wind Farm Selac 1, 2 and 3 located near the village of Bajgora in the municipality of Mitrovica, in Northern Kosovo. It includes 20 km connection powerline.

Facilities:

The project consists of 27 WTGs type GE 3.8-137 with a capacity of 3.83 MW with a hub height of 110 m and total capacity of 103.41 MW. The energy will be connected to the existing grid through an 110kV overhead line (OHL), having approximately 20 km length. The power line is considered part of the Project during its construction and will be considered an associated facility for the operation phase.

EPC Contractor:

NOTUS

Site Management:

All key managerial roles involved in the Construction Site management and in the windfarm operation, mainly referring to the SOWI personnel.

Table of Contents

1.0 PURPOSE AND SCOPE	3
2.0 ROLES AND RESPONSIBILITIES.....	4
3.0 BACKGROUND POLICIES AND STANDARDS.....	6
3.1 National standards and regulation	6
3.2 International standards.....	6
3.3 Project limit values	7
4.0 MITIGATION MEASURES/ACTION	7
4.1 Construction	8
4.2 Operations.....	12
5.0 MONITORING ACTIONS.....	16
5.1 Construction	17
5.2 Operation.....	19
6.0 AUDIT AND REVIEW.....	22
7.0 REPORTING	22
7.1 Reporting of the monitoring activities	22
7.2 Reporting of the auditing activities	23
7.3 Self-monitoring report.....	23
TABLES	
Table 1: Roles and responsibilities	4
Table 2: National standards and regulations	6
Table 3: International standards	6
Table 4: Mitigation measures/actions for construction phase	8
Table 5: Mitigation measures/actions for operation phase	12
Table 6: Monitoring actions for construction phase	17
Table 7: Monitoring actions for operation phase	19

1.0 PURPOSE AND SCOPE

This Community Health & Safety (CHS) Management Plan (MP) identifies and presents the framework and the strategy for implementing SOWI Environmental and Social Management System (ESMS) in relation to Community Health & Safety aspects.

It has been developed in accordance with SOWI policies, with the commitments undertaken in the ESIA, with Kosovo regulatory framework, with EBRD Environmental and Social Policy and Performance Requirement PR4, IFC Performance Standard PS4 and IFC General and Sector Specific EHS Guidelines.

This CHS MP applies to both **construction phase** and **operation phase** of the Project. It provides also guidelines to the contractor in charge for the Engineering Procurement and Construction (EPC) activities of the Project for addressing Environmental and Social aspects according to the standards mentioned above.

Additional details related to the operation phase of the Project are expected to come in due course; it is therefore recommended that this plan is subject to a systematic review process before start of operations in order to encompass and consider any information relevant to the CHS matters.

The Purpose of this MP is to define:

- Project standards for managing CHS matters during the construction phase;
- the scope and applicable interphases for the management of addressing CHS management and monitoring activities during the construction phase;
- responsibilities, commitments, operating procedures and instructions for the implementation of this MP;
- the mitigation measures applicable to the Project in relation to CHS aspects
- and manage the monitoring activities performance in relation to CHS aspects.

This MP applies to normal operating conditions during the construction and operation activities and does not specifically address any emergency situation. Emergencies are addressed in a specific Emergency Response Plan (ERP).

The overall objective of this MP is to identify the mitigation and monitoring measures in order to:

- adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimize and restore impacts to the environment;
- develop and implement policies, plans and procedures to integrate environmental and social aspects within the overall project management framework throughout its lifecycle;
- establish a monitor program to assess the effects of residual impacts on the environment;
- report the results of the periodic audits and provide for corrective actions, if necessary, in order to reach the planned objectives.

2.0 ROLES AND RESPONSIBILITIES

Principal roles and responsibilities for the implementation of this plan are in Table 1 outlined below.

Table 1: Roles and responsibilities

Role	Overall responsibilities	Specific responsibilities
Management	<ul style="list-style-type: none"> ■ Finalizing approval of this Management Plan and NOTUS plans/procedures for the Project; ■ Taking appropriate actions to address major Non-Conformities based on audit reports, performance monitoring reports and on SOWI HSE Manager proposed approach. 	<ul style="list-style-type: none"> ■ Final approval of this Management Plan and subcontractors' plans/procedures for the Project; ■ Taking appropriate actions to address major Non-Conformities based on audit reports, performance monitoring reports and on SOWI HSE Manager proposed approach
HSE Manager	<ul style="list-style-type: none"> ■ Ensuring that this Plan is up to date and appropriate to the nature and scale of the Project and ensuring that this Management Plan is implemented effectively by NOTUS; ■ Programming inspections and audit activities to ensure the correct implementation of this Management Plan; and of specialized contractor(s) tasks ■ Collecting, organizing and reviewing monitoring data and performance monitoring reports provided by the specialized contractor(s) and providing summary results of such reports to Management, to stakeholders and to the Lenders 	<ul style="list-style-type: none"> ■ Ensuring that action/measures and monitoring activities directly under SOWI responsibilities are carried out timely and adequately according to this Management Plan requirements; ■ addressing Non-Conformities through the definition of Preventive/Corrective actions proposing to Management, if necessary, amendments and/or updates to this Management Plan and issuing plan revisions; ■ bringing major Non-Conformities immediately to the attention of Management;
EPC contractor and subcontractors	<ul style="list-style-type: none"> ■ Ensure that all the activities of the Project are carried out in accordance with this Management Plan 	<ul style="list-style-type: none"> ■ Report to non-conformities to the subcontractors and ensure the non-conformities will be solved as soon as possible.

Role	Overall responsibilities	Specific responsibilities
	<ul style="list-style-type: none"> ■ Ensure the planning, preparation and provision of the trainings in order to enable the full implementation of this plan ■ Regularly audit the Construction Site to ensure requirements stated in this Management Plan are implemented 	<ul style="list-style-type: none"> ■ Ensure that the regular measurement activities carried on (water, air, noise etc.) will be conducted. ■ Record and investigate all external grievances and ensure they are solved in a proper timeframe. For the ones that cannot solved by NOTUS, communicate it to the SOWI HSE Manager
All employees and contractors	<ul style="list-style-type: none"> ■ Comply with environmental management requirements. 	<ul style="list-style-type: none"> ■ Give evidence that the relevant mitigation measures identified in the current CHS management plan are being properly considered, implemented and monitored during execution of the works.

3.0 BACKGROUND POLICIES AND STANDARDS

This section includes all those policies, standards and requirements of reference for this Management Plan that are applicable to the Project during the construction phase.

This section includes references

- to applicable national laws and regulations, including those laws implementing host country obligations under international law and treaties;
- to the applicable international standards i.e. those issued by:
 - EBRD Performance Requirements (May 2014) and related guidance documents and EU Regulatory framework (EU Regulations and Directives).
 - IFC Performance Standards (2012) and EHS general and sector specific EHS Guidelines.

The project is expected to achieve whichever is more stringent amongst national standards and EBRD Performance Requirements (including EU Regulatory framework). The IFC General EHS Guidelines will be applicable in the absence of applicable Kosovo and EU standards.

3.1 National standards and regulation

Table 2: National standards and regulations

Kosovo Reg. Gaz. Date
Law No.03/L –212 on Labour
Law No 04/L-161 on Safety and Health at Work
Law No. 04/L-006 on Social Economic Council

3.2 International standards

Table 3: International standards

International standards
EBRD Environmental and Social Policy and Performance Requirements (PR)
EBRD PR4: Health and Safety
Directive 2008/50/EC
Directive 97/68/EC
Directive 89/391/EEC
IFC Performance Standards (PS) and Guidance Notes (GN)
IFC PS4 - Community Health, Safety and Security
IFC GN4 - Community Health, Safety and Security
IFC General EHS Guidelines - § 3. Community Health and Safety

International standards
IFC General EHS Guidelines: § 4. Construction and Decommissioning, § 4.3 Community Health and Safety
IFC Industry Sector Guidelines - EHS Guidelines for Wind Energy - § 1.3 Community Health and Safety
IFC Industry Sector Guidelines - EHS Guidelines for Electric Power Transmission and Distribution - § 1.3 Community Health and Safety

3.3 Project limit values

There are no quantitative limit values to be applied. The IFC emissions values included in the General EHS Guidelines will be applicable in the absence of applicable Kosovo and EU limit values.

4.0 MITIGATION MEASURES/ACTION

Based on the ESIA the potential impacts on components deriving from CHS management during the construction phase are:

- Emission of dust and particulate matter
- Emission of gaseous pollutants
- Emission of noise and vibrations
- Increase of traffic
- Influx of workers

The following table details the environmental management and mitigation measures/actions identified for CHS management activities during construction phase. For each measure/action identified, the table shows:

- Item: the identification code of the mitigation measure/actions (ID.);
- Measure/Actions: description of the mitigation measure/ actions;
- Source document: is the reference to one or more applicable standard (i.e. National Regulation and Permits, EBRD Performance Requirements and related EU Regulations/Directives, IFC PS/Guidelines, or other GIIP);
- Timeline and frequency: frequency/timing of the measure/action;
- KPI (Key performance indicator): quantitative compliance indicator or qualitative acceptance criteria that can be used to verify the actual effectiveness of the mitigation measure/actions;
- Responsibility: resource responsible for implementing the measures/actions;
- WF/OHL: indication whether the measure/action is applicable to the Wind Farm (WF) and/or Overhead Line (OHL)

The aim of the “mitigation hierarchy” (avoidance, minimization, rehabilitation/restoration, offset) is applied for the selection of the measures to limit as far as possible negative impacts to the environment.

This process is intended as an adaptive management system of the project, so that the mitigation and management approach will be adapted based on any new findings which could arise from the monitoring program described in the following section.

4.1 Construction

Table 4: Mitigation measures/actions for construction phase

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
CHS01	<p>Avoidance:</p> <ul style="list-style-type: none"> ■ Avoid to the extent possible locating them on farmed land or land with the presence of fruit trees or other assets ■ Place OHL pylons near edges of land plots to optimize land use ■ Avoid hazards and reduce risks related to OHL by dissemination of information in the areas nearby the OHL ■ Enforce workers code of conduct to avoid injuries ■ OHS, Environmental and Social Trainings, to avoid injuries in particular: <ul style="list-style-type: none"> ▪ Legal H&S Training, First Aid Training, Emergency Response Team Members Training, H&S Technical Training (confined space, working at height etc.), Waste Management including spill response, Environmental Awareness, Traffic Safety, Code of ethics. 	EBRD PR 4 IFC PS 4 Law No. 6331, 20/06/2012	During construction phase	Record of training	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/O HL
CHS02	<p>Minimization (Land Acquisition and Livelihood restoration)</p> <ul style="list-style-type: none"> ■ Minimize the amount of land occupied during construction ■ Ensure full application of the LALRF, in line with national legislation and EBRD and IFC standards; ■ Ensure that all compensations are paid before the start of construction activities; ■ Ensure that the LALRF process is subject to a completion audit carried out by an external auditor; 	EBRD PR 4 IFC PS 4 Law No. 6331, 20/06/2012	During construction phase	Record of training	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/O HL

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> ■ Implement a grievance mechanism specific for land acquisition and livelihood restoration issues. Ensure that all project affected people are informed about this channel to submit grievances. Ensure that the grievance mechanism is managed in line with indications of the LALRF and that appropriate budget and resources are assigned. ■ Ensure that the Land Acquisition and Livelihood Restoration process is monitored in line with the indications provided in the specific section of the LALRF 					
<p>CHS03</p>	<p><u>Minimization (increased exposure to atmospheric pollutants):</u> Pollution control, mitigation measures related to:</p> <ul style="list-style-type: none"> ■ Air: in relation to the management of community exposure to dust and other emissions generated by construction activities, the construction Site will be wetted through controlled application of the water sprays ■ Waste: reducing the amount of waste generation and to avoid, minimize, and control adverse impacts ■ Water quality: reduce water use for equipment cleaning, visual inspection of pipes, tank reservoir and taps tightness, water distribution system at construction Site, water quality measurement, spill kits placed in the construction Site, Impermeable settlement pools for concrete mixer washing, ■ Noise: agree on the working hours of the construction, checks noise levels, Noise monitoring, Noise measurement, no night work planned, 	EBRD PR 4 IFC PS 4 GIIP Internal resources	During construction phase	Annual Environmental report	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/O HL

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> ■ Traffic: Adoption of best transport safety practices, driving trainings, avoid overtiredness, avoiding dangerous routes, speed limits, adequate number of road signs, improved signage visibility. ■ Hazardous materials: moved or transferred by qualified operators, proper labelling of containers, spill kits 					
<p>CHS04</p>	<p><u>Minimization (interference with local traffic/vehicular incidents):</u></p> <p>Traffic</p> <ul style="list-style-type: none"> ■ Speed limits will be defined and applied throughout the construction routes and legal requirement will be applied for public road. ■ Visible signs, signals and flags will be placed in necessary areas and officers will be assigned to regulate the transits. Where temporary traffic signals are required (especially in the public roads), the details and locations of the signs shall be discussed with the relevant authorities. ■ The signs will be secured tightly in a way to prevent detachment or displacement and will be visible and understandable by all. The contractor will be responsible for checking the signs to clean and secure them whenever needed. ■ Whenever it is necessary to close out the roads, alternative routes will be planned and informed in advance to the authorities (including emergency service and public transport services) and the relevant local people (by means of public meetings to be organized prior to the construction) and proper signs will be placed. 	<p>EBRD PR 4 IFC PS 4 GIIP Internal resources</p>	<p>During construction phase</p>	<p>Record of internal regulation</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	<p>WF/O HL</p>

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
<p>CHS05</p>	<p><u>Minimization:</u></p> <p>Health</p> <ul style="list-style-type: none"> ■ Cooperate and coordinate with local health and safety facilities to minimize impacts on health centres and access for the local population ■ Pre-employment health screening and regular medical checks of workers as per regulatory requirements will be ensured; ■ Local public health campaigns will be supported (if any); ■ Workplace Physician appointed in compliance with the regulatory requirements; ■ Trainings provided to workers by Workplace Physician which will include the information related to communicable diseases and occupational diseases and preventive measures. This training may include health lifestyle subject as a GIIP; ■ Grievance Mechanism will be actively used to monitor concerns of community 	<p>EBRD PR 4 IFC PS 4 GIIP</p>	<p>During construction phase</p>	<p>Record of sanitary surveillance</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	<p>WF/O HL</p>
<p>CHS06</p>	<p><u>Restoration:</u></p> <ul style="list-style-type: none"> ■ Upon the completion of construction activities, fully reinstate rented land and ensure it is handed over in its original conditions, to the extent possible. 	<p>EBRD PR 4 IFC PS 4 GIIP</p>	<p>During construction phase</p>	<p>Record of sanitary surveillance</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	<p>WF/O HL</p>

4.2 Operations

Table 5: Mitigation measures/actions for operation phase

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
CHS05	<p>Avoidance:</p> <ul style="list-style-type: none"> ■ Avoid to the extent possible locating them on farmed land or land with the presence of fruit trees or other assets ■ Place OHL pylons near edges of land plots to optimize land use ■ Avoid hazards and reduce risks related to OHL by dissemination of information in the areas nearby the OHL ■ Enforce workers code of conduct to avoid injuries ■ OHS, Environmental and Social Trainings, to avoid injuries in particular: <ul style="list-style-type: none"> ▪ Legal H&S Training, First Aid Training, Emergency Response Team Members Training, H&S Technical Training (confined space, working at height etc.), Waste Management including spill response, Environmental Awareness, Traffic Safety, Code of ethics. 	IFC PS 4 EBRD PR 4 Law No. 6331, 20/06/2012	During operation phase	Record of training	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/O HL
CHS06	<p>Minimization (Land Acquisition and Livelihood Restoration)</p> <ul style="list-style-type: none"> ■ Minimize the amount of land occupied during construction ■ Ensure full application of the LALRF, in line with national legislation and EBRD and IFC standards; ■ Ensure that all compensations are paid before the start of construction activities; ■ Ensure that the LALRF process is subject to a completion audit carried out by an external auditor; 	EBRD PR 4 IFC PS 4 GIIP Internal resources	During operation phase	Annual Environmental report	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/O HL

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> ■ Implement a grievance mechanism specific for land acquisition and livelihood restoration issues. Ensure that all project affected people are informed about this channel to submit grievances. Ensure that the grievance mechanism is managed in line with indications of the LALRF and that appropriate budget and resources are assigned. ■ Ensure that the Land Acquisition and Livelihood Restoration process is monitored in line with the indications provided in the specific section of the LALRF 					
<p>CHS07</p>	<p><u>Minimization (increased exposure to atmospheric pollutants):</u> Pollution control, mitigation measures related to:</p> <ul style="list-style-type: none"> ■ Air: in relation to the management of community exposure to dust and other emissions generated by construction activities, the construction Site will be wetted through controlled application of the water sprays ■ Waste: reducing the amount of waste generation and to avoid, minimize, and control adverse impacts ■ Water quality: reduce water use for equipment cleaning, visual inspection of pipes, tank reservoir and taps tightness, water distribution system at construction Site, water quality measurement, spill kits placed in the construction Site, Impermeable settlement pools for concrete mixer washing, ■ Noise: agree on the working hours of the construction, checks noise levels, Noise monitoring, Noise measurement, no night work planned, 	<p>EBRD PR 4 IFC PS 4 GIIP Internal resources</p>	<p>During operation phase</p>	<p>Record of internal regulation</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	<p>WF/O HL</p>

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> ■ Traffic: Adoption of best transport safety practices, driving trainings, avoid overtiredness, avoiding dangerous routes, speed limits, adequate number of road signs, improved signage visibility. ■ Hazardous materials: moved or transferred by qualified operators, proper labelling of containers, spill kits 					
<p>CHS08</p>	<p><u>Minimization</u> (interference with local traffic/vehicular incidents):</p> <p>Traffic</p> <ul style="list-style-type: none"> ■ Speed limits will be defined and applied throughout the construction routes and legal requirement will be applied for public road. ■ Visible signs, signals and flags will be placed in necessary areas and officers will be assigned to regulate the transits. Where temporary traffic signals are required (especially in the public roads), the details and locations of the signs shall be discussed with the relevant authorities. ■ The signs will be secured tightly in a way to prevent detachment or displacement and will be visible and understandable by all. The contractor will be responsible for checking the signs to clean and secure them whenever needed. ■ Whenever it is necessary to close out the roads, alternative routes will be planned and informed in advance to the authorities (including emergency service and public transport services) and the relevant local people (by means of public meetings to be organized prior to the construction) and proper signs will be placed. 	<p>EBRD PR 4 IFC PS 4 GIIP</p>	<p>During operation phase</p>	<p>Record of sanitary surveillance</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	<p>WF/O HL</p>

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
<p>CHS09</p>	<p><u>Minimization:</u></p> <p>Health</p> <ul style="list-style-type: none"> ■ Cooperate and coordinate with local health and safety facilities to minimize impacts on health centres and access for the local population ■ Pre-employment health screening and regular medical checks of workers as per regulatory requirements will be ensured; ■ Local public health campaigns will be supported (if any); ■ Workplace Physician appointed in compliance with the regulatory requirements; ■ Trainings provided to workers by Workplace Physician which will include the information related to communicable diseases and occupational diseases and preventive measures. This training may include health lifestyle subject as a GIIP; ■ Grievance Mechanism will be actively used to monitor concerns of community 	<p>EBRD PR 4 IFC PS 4 GIIP</p>	<p>During construction phase</p>	<p>Record of sanitary surveillance</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	<p>WF/O HL</p>

5.0 MONITORING ACTIONS

The following table details the monitoring actions identified for CHS management activities during the construction phase. The aim of the monitoring actions is to verify whether the residual impacts are under control and the mitigation measures/action have been effective.

For each monitoring measure/action identified, the table shows:

- Item: the identification code of the monitoring activity (ID.);
- Monitoring Activity: description of the monitoring activity;
- Source document: is the reference to one or more applicable standard or limit value (i.e. National Regulation and Permits, EBRD Performance Requirements and related EU Regulations/Directives, IFC PS/Guidelines, or other GIIP);
- Timeline and frequency: frequency/timing of the monitoring activity;
- KPI (Key performance indicator): regulatory limit value or qualitative acceptance criteria to comply with;
- Responsibility: resource responsible for implementing the monitoring activity;
- WF/OHL: indication whether the measure/action is applicable to the Wind Farm (WF) and/or Overhead Line (OHL)

5.1 Construction

Table 6: Monitoring actions for construction phase

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
CHS09	<ul style="list-style-type: none"> ■ Verification of information spread regarding risk related to OHL ■ Frequent controls to check the construction of buildings or illegal buildings near the area of risk (25 Meters) ■ OHS, Environmental, H&S Trainings, in particular: <ul style="list-style-type: none"> ▪ Legal H&S Training, First Aid Training, Emergency Response Team Members Training, H&S Technical Training (confined space, working at height etc.), Waste Management including spill response, Environmental Awareness, Traffic Safety, Code of ethics. 	EBRD PR 4 IFC PS 4 Law No. 6331 20/06/2012	Monthly	Number and % of worker trained Number of maintenances performed	NOTUS to record and provide data to SOWI SOWI for collecting data	OHL
CHS10	<ul style="list-style-type: none"> ■ Number of meeting with local communities ■ Number of complaints ■ Number of grievances ■ Number of compensations approved ■ audit carried out by an external auditor; 	EBRD PR 4 IFC PS 4 Law No. 6331, 20/06/2012	Monthly	Record of meetings Number and % of grievances responded and solved within timeframe	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL
CHS11	<ul style="list-style-type: none"> ■ Pollution control, in particular mitigation measures related to: <ul style="list-style-type: none"> ▪ Air: dust measurement, emission measurement 	EBRD PR 4 IFC PS 4	Quarterly	Number of measurements performed and number of	NOTUS to record and provide data to SOWI	WF/OHL

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> ▪ Waste: amount of waste generation ▪ Water quality: water distribution system, recycled water for equipment cleaning, tank reservoir and taps tightness, water quality measurement, ▪ Noise: noise levels checks, Noise monitoring on specific target, Noise measurement with respect to relevant regulation, no night work planned, ▪ Traffic: driving trainings, avoidance of driving in overtiredness, avoiding dangerous routes, speed limits, adequate number of road signs, improved signage visibility. ▪ Hazardous materials: labelling of containers, spill kits 	GIIP		exceeding recorded	SOWI for collecting data	
CHS12	<ul style="list-style-type: none"> ■ Number of recorded traffic incidents involving community members ■ Speed limits applied throughout the construction routes and legal requirement applied for public road. ■ Presence of visible signs, signals and flags placed in necessary areas and officers assigned to regulate the transits. ■ signs secured tightly to prevent detachment or displacement, visible and understandable by all. ■ Alternative routes. 	EBRD PR 4 IFC PS 4	Monthly	Number of traffic accident recordings	NOTUS to record and provide data to SOWI SOWI for collecting data	WG/OHL

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
CH13	<ul style="list-style-type: none"> Number of communicable and non-communicable diseases and injuries among workers. In particular: Pre-employment health screening and regular medical checks of workers, local public health campaigns, workplace Physician appointed, trainings provided. 	EBRD PR 4 IFC PS 4	Quarterly	Number of diseases and injuries.	NOTUS to record and provide data to SOWI SOWI for collecting data	WG/OHL
CH14	<ul style="list-style-type: none"> Reinstatement of rented land 	EBRD PR 4 IFC PS 4	Quarterly	Number of Reinstatement of rented land.	NOTUS to record and provide data to SOWI SOWI for collecting data	WG/OHL

5.2 Operation

Table 7: Monitoring actions for operation phase

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
CHS13	<ul style="list-style-type: none"> Verification of information spread regarding risk related to OHL Frequent controls to check the construction of buildings or illegal buildings near the area of risk (25 Meters) OHS, Environmental, H&S Trainings, in particular: Legal H&S Training, First Aid Training, Emergency Response Team Members Training, H&S Technical Training (confined space, working at height etc.), 	EBRD PR 4 IFC PS 4 Law No. 6331 20/06/2012	Monthly	Number and % of worker trained Number of maintenances performed	NOTUS to record and provide data to SOWI SOWI for collecting data	OHL

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	Waste Management including spill response, Environmental Awareness, Traffic Safety, Code of ethics.					
CHS14	<ul style="list-style-type: none"> ■ Number of meeting with local communities ■ Number of complaints ■ Number of grievances ■ Number of compensations approved ■ audit carried out by an external auditor; 	IFC PS 4 EBRD PR 4 Law No. 6331, 20/06/2012	Monthly	Record of meetings Number and % of grievances responded and solved within timeframe	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL
CHS15	<ul style="list-style-type: none"> ■ Pollution control, in particular mitigation measures related to: <ul style="list-style-type: none"> ■ Air: dust measurement, emission measurement ■ Waste: amount of waste generation ■ Water quality: water distribution system, recycled water for equipment cleaning, tank reservoir and taps tightness, water quality measurement, ■ Noise: noise levels checks, Noise monitoring on specific target, Noise measurement with respect to relevant regulation, no night work planned, ■ Traffic: driving trainings, avoidance of driving in overtiredness, avoiding dangerous routes, speed limits, adequate number of road signs, improved signage visibility. 	IFC PS 4 EBRD PR 4 GIIP	Quarterly	Number of measurements performed and number of exceeding recorded	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> Hazardous materials: labelling of containers, spill kits 					
CHS16	<ul style="list-style-type: none"> Number of recorded traffic incidents involving community members Speed limits applied throughout the construction routes and legal requirement applied for public road. Presence of visible signs, signals and flags placed in necessary areas and officers assigned to regulate the transits. signs secured tightly to prevent detachment or displacement, visible and understandable by all. Alternative routes. 	IFC PS 4 EBRD PR 4	Monthly	Number of traffic accident recordings	NOTUS to record and provide data to SOWI SOWI for collecting data	WG/OHL
	<ul style="list-style-type: none"> Number of communicable and non-communicable diseases and injuries among workers. In particular: Pre-employment health screening and regular medical checks of workers, local public health campaigns, workplace Physician appointed, trainings provided. 	IFC PS 4 EBRD PR 4	Quarterly	Number of diseases and injuries.	NOTUS to record and provide data to SOWI SOWI for collecting data	WG/OHL
	<ul style="list-style-type: none"> Reinstatement of rented land 	IFC PS 4 EBRD PR 4	Quarterly	Number of Reinstatement of rented land.	NOTUS to record and provide data to SOWI SOWI for collecting data	WG/OHL

6.0 AUDIT AND REVIEW

The correct implementation of this Management Plan is verified through internal inspections and audits to be carried out according to the requirements included in section “Internal audit” of the “ESMS Manual” and in the “Audit and Non-Conformities Procedure”.

The schedule, the frequency, the scope and objectives of the audit as well as the responsible internal auditors are indicated in the Audit Program that is developed and updated by SOWI.

Internal auditing shall address:

- The correct implementation of this Management Plan
- The correct development and implementation of Contractor’s Plan
- The correct and timely implementation of an auditing and review system by the Contractor
- Each of the point indicated in the tables in section 4.0 (mitigation measures/actions) and 5.0 (monitoring activities) of this plan and in particular:
 - OHS, Environmental and Social Trainings
 - pollution control
 - traffic/vehicular incidents
 - public healththe establishment of a stakeholder engagement process related to the aspects addressed by this Management Plan.

Evidences and results of the inspection and audit activities are included in the audit reports and in the “Non-Conformity and Preventive/Corrective actions” records.

SOWI Management reviews results of inspections and audits and the progress of the Preventive/Corrective actions and takes additional appropriate actions if necessary, according to the indications included in section 7 “Management Review” of the ESMS Manual.

During steady state operations, this Management Plan will be reviewed on an annual basis and any necessary revisions made to reflect the changing circumstances, operational needs or monitoring results. Revision of this Management Plan will be the responsibility of the HSE Manager, who is in charge of this Plan.

7.0 REPORTING

This section provides instructions and requirements for the reporting related to mitigation measures/actions, to monitoring activities and to internal auditing.

7.1 Reporting of the monitoring activities

Evidences and results of the monitoring activities (detailed in section 5.0) have to be described in detail in appropriate monitoring reports. These monitoring reports must include the following minimum information/data (where relevant):

- analytical certificates from the laboratory/ies;
- localization of the monitoring activities (geographical coordinates in WGS84 system and elevation);
- timing of the data collection (start date and end date);
- description of the applied methodology;

- KPI (Key performance indicator): regulatory limit value or qualitative acceptance criteria to comply with;
- the responsibility for implementing the specific monitoring activities (including reference to this Management Plan and reference to the appointment of third parties eventually contracted to perform part of the activity (e.g. external laboratories and consultants);
- conclusions on compliance vs. KPI and eventual observations;
- quality control procedures applied to ensure consistency and reliability of the analyses or results.

7.2 Reporting of the auditing activities

The correct implementation of this Management Plan is to be verified through internal audits to be carried out according to the requirements included in the “ESMS Manual”, the internal auditing procedure and section 6.0 “Audit and review” of this Management Plan.

Evidences of the implementation of the mitigation measures/actions (detailed in section 4.0), of the timely deployment of monitoring activities (detailed in section 5.0) and of related results are described in the audit reports. These audit reports must include the following minimum information/data:

- list of the items audited (detailed in sections 4.0 and 5.0);
- information whether the items have been implemented within the indicated timeline and frequency;
- achievement (or not) of the KPIs;
- description of non-compliances eventually identified.

7.3 Self-monitoring report

Monitoring data together with the results of the audit activities will be summarized in a Self-Monitoring Report on a quarterly basis that will be provided every quarter to the Lenders and eventually to stakeholders as further described in the “ESMS Manual”.



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Bajgora Wind Project

Supply Chain Management Plan (SC MP)

Submitted to:

SOWI Kosovo

Submitted by:

Golder Associates S.r.l.

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19122298/12269 Final

October 3rd, 2019



Acronyms and Definitions

SC Supply Chain

ESMS Environmental and Social Management System

EBRD European Bank for Reconstruction and Development

IFC International Finance Corporation

KPI Key Performance Indicators

PR Performance Requirement (issued by EBRD)

PS Performance Standard (issued by IFC)

HSE Health, Safety and Environment

ESIA Environmental and Social Impact Assessment

EPC Engineering Procurement and Construction

ERP Emergency Response Plan

EU European Union

ESHS Environmental, Social Health and Safety

ESMP(s) Environmental and Social Management Plan(s)

MP Management Plan

WF Wind Farm

OHL Overhead line

GIIP Good International Industry Practice

OHS Occupational Health and Safety

BAT Best Available Technology

ISO International Organization for Standardization

Client:	SOWI (Solar & Wind) Kosovo
Project:	Wind Farm Selac 1, 2 and 3 located near the village of Bajgora in the municipality of Mitrovica, in Northern Kosovo. It includes 20 km connection powerline.
Facilities:	The project consists of 27 WTGs type GE 3.8-137 with a capacity of 3.83 MW with a hub height of 110 m and total capacity of 103.41 MW. The energy will be connected to the existing grid through an 110kV overhead line (OHL), having approximately 20 km length. The power line is considered part of the Project during its construction and will be considered an associated facility for the operation phase.
EPC Contractor:	NOTUS
Site Management:	All key managerial roles involved in the Construction Site management and in the windfarm operation, mainly referring to the SOWI personnel.

Table of Contents

1.0 PURPOSE AND SCOPE.....II

2.0 ROLES AND RESPONSIBILITIES.....1

3.0 BACKGROUND POLICIES AND STANDARDS.....3

 3.1 National standards and regulation3

 3.2 International standards.....3

4.0 MITIGATION MEASURES/ACTION5

5.0 MONITORING ACTIONS7

 5.1 Construction7

 5.2 Operation.....9

6.0 AUDIT AND REVIEW.....12

7.0 REPORTING12

 7.1 Reporting of the auditing activities12

 7.2 Self-monitoring report.....13

TABLES

Table 1: Roles and responsibilities 1

Table 2: National standards and regulations 3

Table 3: International standards 3

Table 4: Monitoring actions for construction phase 7

Table 5: monitoring actions for the operation phase 9

1.0 PURPOSE AND SCOPE

This Supply Chain (SC) Management Plan (MP) identifies and presents the framework and the strategy for implementing SOWI Environmental and Social Management System (ESMS) in relation to Contractor, supply chain aspects.

It has been developed accordance with SOWI policies, with the commitments undertaken in the ESIA, with Kosovo regulatory framework, with EBRD Environmental and Social Policy and Performance Requirements PR1 and PR2, IFC Performance Standards PS1 and PS2 and IFC General and Sector Specific EHS Guidelines.

This SC MP applies to both **construction phase** and **operation phase** of the Project. It provides also guidelines to the contractor in charge for the Engineering Procurement and Construction (EPC) activities of the Project for addressing Environmental and Social aspects according to the standards mentioned above.

Additional details related to the operation phase of the Project are expected to come in due course; it is therefore recommended that this plan is subject to a systematic review process before start of operations in order to encompass and consider any information relevant to the SC matters.

The Purpose of this Plan is to define:

- Project standards for SC matters;
- the scope and applicable interphases for addressing SC management and monitoring activities;
- responsibilities, commitments, operating procedures and instructions for the implementation of this MP;
- the mitigation measures applicable to the Project in relation to SC aspects
- the monitoring activities performance in relation to SC aspects.

This MP applies to normal operating conditions during the construction and operation activities and does not specifically address any emergency situation. Emergencies are addressed in a specific Emergency Response Plan (ERP).

The overall objective of this MP is to identify the mitigation and monitoring measures in order to:

- adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimize and restore impacts to the environment;
- develop and implement policies, plans and procedures to integrate environmental and social aspects within the overall project management framework throughout its lifecycle;
- establish a monitor program to assess the effects of residual impacts on the environment;
- report the results of the periodic audits and provide for corrective actions, if necessary, in order to reach the planned objectives.

2.0 ROLES AND RESPONSIBILITIES

Principal roles and responsibilities for the implementation of this plan are in Table 1 outlined below.

Table 1: Roles and responsibilities

Role	Overall responsibilities	Specific responsibilities
Management	<ul style="list-style-type: none"> ■ Management will ensure sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of actions, measures and monitoring activities under SOWI's responsibility. ■ This will include the selection of specialized contractor(s) for specific tasks to be carried out as part of the implementation of this Management Plan such as (but not limited to) SC management surveys, monitoring activities and data analysis and reporting; ■ designating specific personnel on site or at the administrative level, clearly define their roles and responsibilities within the environmental and social management system; 	<ul style="list-style-type: none"> ■ Final approval of this Management Plan and subcontractors' plans/procedures for the Project; ■ Taking appropriate actions to address major Non-Conformities based on audit reports, performance monitoring reports and on SOWI HSE Manager proposed approach ■ Finalizing approval of this Management Plan and NOTUS plans/procedures for the Project ■ Taking appropriate actions to address major Non-Conformities based on audit reports, performance monitoring reports and on SOWI HSE Manager proposed approach
HSE Manager	<ul style="list-style-type: none"> ■ Ensuring that this Plan is up to date and appropriate to the nature and scale of the Project and ensuring that this Management Plan is implemented effectively; ■ Programming inspections and audit activities to ensure the correct implementation of this Management Plan; and of specialized contractor(s) tasks ■ Collecting, organizing and reviewing monitoring data and performance monitoring reports provided by the specialized contractor(s) and providing summary results of such reports to Management, to stakeholders and to the Lenders 	<ul style="list-style-type: none"> ■ Ensuring that action/measures and monitoring activities directly under SOWI responsibilities are carried out timely and adequately according to this Management Plan requirements; ■ addressing Non-Conformities through the definition of Preventive/Corrective actions proposing to Management, if necessary, amendments and/or updates to this Management Plan and issuing plan revisions; ■ bringing major Non-Conformities immediately to the attention of Management;

Role	Overall responsibilities	Specific responsibilities
EPC contractor and subcontractors	<ul style="list-style-type: none"> ■ NOTUS will ensure effective execution of the specific tasks assigned in conformity with this Management Plan and with contractual arrangements; ■ will ensure sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of this Management Plan. ■ respect of EHS requirements included in the ESMS; ■ agree with the timing and logistics of the monitoring activities ■ If any subcontractor is involved, it is responsible for duly implementing the same requirements included in NOTUS Plans/Procedures under the supervision of SOWI 	<ul style="list-style-type: none"> ■ will provide relevant monitoring data and monitoring reports to SOWI ■ provide relevant monitoring data and monitoring reports to as indicated in this plan; ■ may propose changes and integrations to the monitoring activities included in the Management Plan; the proposed changes shall be evaluated and approved by HSE Manager and by Management.
All employees and contractors	<ul style="list-style-type: none"> ■ Comply with environmental management requirements. ■ Report any activities which are causing unnecessary biodiversity issues. 	<ul style="list-style-type: none"> ■ Give evidence that the relevant mitigation measures identified in the current SC management plan are being properly considered, implemented and monitored during execution of the works.

3.0 BACKGROUND POLICIES AND STANDARDS

This section includes all those policies, standards and requirements of reference for this Management Plan that are applicable to the Project during the construction phase.

This section includes references

- to applicable national laws and regulations, including those laws implementing host country obligations under international law and treaties;
- to the applicable international standards i.e. those issued by:
 - EBRD Performance Requirements (May 2014) and related guidance documents and EU Regulatory framework (EU Regulations and Directives).
 - IFC Performance Standards (2012) and EHS general and sector specific EHS Guidelines.

The project is expected to achieve whichever is more stringent amongst national standards and EBRD Performance Requirements (including EU Regulatory framework). The IFC General EHS Guidelines will be applicable in the absence of applicable Kosovo and EU standards.

3.1 National standards and regulation

Table 2: National standards and regulations

Kosovo Reg. Gaz. Date
Law No.03/L –212 on Labour
Law No 04/L-161 on Safety and Health at Work
Law No. 04/L-219 on Foreigners
Law No. 04/L-011 on Organizing trade union in Kosovo
Law No. 03/L-200 on Strikes
Law No. 04/L-006 on Social Economic Council

3.2 International standards

Table 3: International standards

International standards
EBRD Environmental and Social Policy and Performance Requirements (PR)
EBRD PR2 – Labor and Working Condition
EBRD PR1 – Assessment and Management of Environmental and Social Impacts and Issues
EBRD PR6 – Biodiversity Conservation and Sustainable Management of Living Natural Resources
Directive 2008/50/EC
Directive 97/68/EC

International standards
Directive 89/391/EEC
IFC Performance Standards (PS) and Guidance Notes (GN)
IFC PS1 Assessment and Management of Environmental and Social Risks and Impacts
IFC PS2 Labour and Working Conditions
IFC GN1 Assessment and Management of Environmental and Social Risks and Impacts
IFC GN2 Labour and Working Condition
IFC General EHS Guidelines § 1 Environmental
IFC General EHS Guidelines § 2 Occupational health and safety;
IFC General EHS Guidelines: § 4 Construction and Decommissioning
IFC Industry Sector Guidelines -EHS Guidelines for Wind Energy
IFC Industry Sector Guidelines-EHS Guidelines for Electric Power Transmission and Distribution

4.0 MITIGATION MEASURES/ACTION

Based on the ESIA the potential impacts on environmental components deriving from SC management during the construction phase are:

- Demand for freshwater
- Change in land use and ownership
- Demand for workforce
- Demand for goods, materials and services

The primary suppliers for the Project are identified as follows:

- 1) Main Subcontractors consisting of local and international companies
- 2) Major construction material suppliers composed of local and international companies
- 3) Companies providing outsourced services i.e. catering, cleaning mainly composed of national companies.
- 4) Companies such as employment agencies / or labour hire organization (if any) providing temporary and permanent workforce.

The EPC Contractor will have a fundamental role in the process of managing the supply chain and implementing mitigation measures because most part of the Primary supply chain will be contracted by the EPC Contractor.

EPC Contractor shall implement its own Primary Supply chain Management Plan, providing details on management methods and mitigation measures in line with this Management Plan and IFC PS 2 and including a specific commitment to address and remedy any issue of concern in relation to EBRD Performance Requirements and National regulation requirements.

In particular the following aspects shall to be carefully managed by the EPC Contractor throughout the procurement process:

- Companies whose primary source of income is the Project (e.g. food suppliers/food caterers; local quarries/aggregate suppliers; local cement contractors, etc.) shall receive special scrutiny.
- Companies supplying skilled or semi-skilled labour shall receive special scrutiny. In particular when supplying workforce made of Other Country Nationals (OCNs); these companies need to be verified to be reputable, that they are not “forced labour” and that OCNs are employed in compliance with ILO standards.

With respect to primary supplier selection:

- Potential suppliers must satisfy the project contractor selection requirements before being awarded any contract related to the project.
- Supplier selection procedures are designed to evaluate a potential contractor’s capacity and commitment for identifying and controlling HSE risks.
- Tender evaluation procedures will evaluate the HSE performance of the supervisors assigned to the project.

In addition, the following enhancement measures will be implemented to increase Project benefits on the economy, employment and livelihood component:

- The Company will implement a program to train local staff, to support them in gaining the skills needed for the operation phase;
- In order to increase the project's Local Contents, the Company will aim to procure goods, services and materials from local businesses to the extent possible;
- A strategy for the procurement of goods, services and materials will be prepared, including a demand-and-supply analysis, in order to identify to what extent local sources can contribute to procurement needs and to implement tailored measures to support local businesses;
- Local companies identified as able to provide goods, materials and services in the during the strategical analysis will be contacted directly providing information on tendering opportunities;
- Local authorities and local communities will be informed and consulted on impacts due to project activities and planned mitigation measures during the pre-construction meetings and throughout the Project life cycle as planned in the Stakeholder Engagement Plan;

The following table details the environmental management for SC management activities during construction and operation phase. For each measure/action identified, the table shows:

- Item: the identification code of the mitigation measure/actions (ID.);
- Measure/Actions: description of the mitigation measure/ actions;
- Source document: is the reference to one or more applicable standard (i.e. National Regulation and Permits, EBRD Performance Requirements and related EU Regulations/Directives, IFC PS/Guidelines, or other GIIP);
- Timeline and frequency: frequency/timing of the measure/action;
- KPI (Key performance indicator): quantitative compliance indicator or qualitative acceptance criteria that can be used to verify the actual effectiveness of the mitigation measure/actions;
- Responsibility: resource responsible for implementing the measures/actions;
- WF/OHL: indication whether the measure/action is applicable to the Wind Farm (WF) and/or Overhead Line (OHL)

The aim of the "mitigation hierarchy" (avoidance, minimization, rehabilitation/restoration, offset) is applied for the selection of the measures to limit as far as possible negative impacts to the environment.

This process is intended as an adaptive management system of the project, so that the mitigation and management approach will be adapted based on any new findings which could arise from the monitoring program described in the following section.

5.0 MONITORING ACTIONS

5.1 Construction

Table 4: Monitoring actions for construction phase

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
SC01	Carry out risk and impacts identification process, considering those risks and impacts associated with primary supply chains, as defined in PS2 (§ 27 - 29) and PS6 (§ 30). The supplier evaluation/selection system of the Contractor (i.e. Vendors and Suppliers requirements) shall include specific information and conditions regarding ESHS performance.	EBRD PR1 §23 PS2 (§ 27 - 29) PS6 (§ 30).	Ongoing during supplier's selection	Records showing supplier selection process considers the ESHS performance Management of change records showing that risks and impacts related to primary supply chain have been considered	SOWI/Contractor	WF/ OHL
SC02	Identify risk of child labour or forced labour in the primary supply chain. Particular attention shall be paid to supplier from countries where there is a risk of child labour. If child labour or forced labour cases are identified, appropriate steps to remedy them will have to be taken. The primary supply chain will have to be monitored on an ongoing basis in order to identify any significant change.	EBRD PR1 §23	Ongoing during supplier's selection	Records showing supplier selection process considers the ESHS performance	SOWI/Contractor	WF/ OHL
SC03	Identify risk of significant safety issues related to supply chain workers. Apply procedures and mitigation measures to ensure that primary suppliers are taking steps to prevent life-threatening situations.	EBRD PR1 §24-26	Ongoing during supplier's selection	Records showing supplier selection process considers the ESHS performance Records showing audit performed by SOWI to Contractor on OHS matters	SOWI/Contractor	WF/ OHL

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	the EPC Contractor will have to pretend from Subcontractor the same level of care in addressing OHS issues requested by SOWI in the documentation of the ESMS.			Records showing audit performed by Contractor to Subcontractors on OHS matters		
SC04	Where ESHS impacts are identified associated with a specific supplier and remedy is not possible in the short term, shift the project's primary supply chain over time to suppliers that comply with this EBRD PR2 §24-26 and PR6 §35.	EBRD PR6 §35 PR 2 §24-26	Ongoing during supplier's selection	Records showing supplier selection process shifted to other suppliers (in case of suppliers with bad ESHS performance)	SOWI/Contractor	WF/ OHL
SC05	Where SOWI or Contractor is purchasing primary production (especially but not exclusively food and fiber commodities) produced with significant risk of natural and/or critical habitats conversion, adopt systems and verification practices as part of the ESMS to evaluate its primary suppliers. The systems and verification practices will: (i) identify where the supply is coming from and the habitat type of this area (ii) provide for an ongoing review of the primary supply chains (iii) limit procurement to those suppliers that can demonstrate that they are not contributing to significant conversion of natural and/or critical habitats (this may be demonstrated by delivery of certified product, or progress towards verification or certification under a credible scheme in certain commodities	EBRD PR6 §36	ongoing	Records showing supplier selection process considers the ESHS performance	SOWI/Contractor	WF/ OHL

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	and/or locations); and where possible, require actions to shift the primary supply chain over time to suppliers that can demonstrate that they are not significantly adversely impacting these areas.					

5.2 Operation

Table 5: monitoring actions for the operation phase

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
SC06	consider those risks and impacts associated with primary supply chains, as defined in PS2 (§ 27 - 29) and PS6 (§ 30) in operation phase and maintenance activities.	EBRD PR1 §23 PS2 (§ 27 - 29) and PS6 (§ 30)	Ongoing during supplier's selection	Records showing supplier selection process considers the ESHS performance Management of change records showing that risks and impacts related to primary supply chain have been considered	SOWI/Contractor	WF/OHL
SC07	Where there is a high risk of child labour or forced labour in the primary supply chain, those risks have to be identified. Particular attention shall be paid to supplier from countries where there is a risk of child labour. If child labour or forced labour cases are identified, appropriate steps to remedy them will have to be taken.	EBRD PR1 §23	Ongoing during supplier's selection	Records showing supplier selection process considers the ESHS performance	SOWI/Contractor	WF/OHL

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
SC08	<p>Identify risk of significant safety issues related to supply chain workers. Apply procedures and mitigation measures to ensure that primary suppliers are taking steps to prevent life-threatening situations.</p> <p>the EPC Contractor will have to pretend from Subcontractor the same level of care in addressing OHS issues requested by SOWI in the documentation of the ESMS.</p>	EBRD PR1 §24-26	Ongoing during supplier's selection	<p>Records showing supplier selection process considers the ESHS performance</p> <p>Records showing audit performed by SOWI to Contractor on OHS matters</p> <p>Records showing audit performed by Contractor to Subcontractors on OHS matters</p>	SOWI/Contractor	WF/OHL
SC09	Where ESHS impacts are identified associated with a specific supplier and remedy is not possible in the short term, shift the project's primary supply chain over time to suppliers that can demonstrate that they are complying with this EBRD PR2 §24-26 and PR6 §35.	EBRD PR6 §35	Ongoing during supplier's selection	Records showing supplier selection process shifted to other suppliers (in case of suppliers with bad ESHS performance)	SOWI/Contractor	WF/OHL
SC10	<p>Where SOWI or Contractor is purchasing primary production (especially but not exclusively food and fiber commodities) that is known to be produced in regions where there is a risk of significant conversion of natural and/or critical habitats, systems and verification practices will be adopted as part of the ESMS to evaluate its primary suppliers. The systems and verification practices will:</p> <p>(i) identify where the supply is coming from and the habitat type of this area</p> <p>(ii) provide for an ongoing review of the primary supply chains</p>	EBRD PR6 §36	Ongoing during supplier's selection	Records showing supplier selection process considers the ESHS performance	SOWI/Contractor	WF/OHL

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<p>(iii) limit procurement to those suppliers that can demonstrate that they are not contributing to significant conversion of natural and/or critical habitats (this may be demonstrated by delivery of certified product, or progress towards verification or certification under a credible scheme in certain commodities and/or locations); and where possible, require actions to shift the primary supply chain over time to suppliers that can demonstrate that they are not significantly adversely impacting these areas.</p>					

6.0 AUDIT AND REVIEW

The correct implementation of this Management Plan is verified through internal inspections and audits to be carried out according to the requirements included in section “Internal audit” of the “ESMS Manual” and in the “Audit and Non-Conformities Procedure”.

The schedule, the frequency, the scope and objectives of the audit as well as the responsible internal auditors are indicated in the Audit Program that is developed and updated by SOWI.

Internal auditing shall address:

- The correct implementation of this Management Plan
- The correct development and implementation of Contractor’s Plan
- The correct and timely implementation of an auditing and review system by the Contractor
- Each of the point indicated in the tables in section 4.0(monitoring activities) of this plan and in particular:
 - Supplier environmental report
 - Employment of local workforce
 - Contracts to local businesses
 - the establishment of a stakeholder engagement process related to the aspects addressed by this Management Plan.

Evidences and results of the inspection and audit activities are included in the audit reports and in the “Non-Conformity and Preventive/Corrective actions” records.

SOWI Management reviews results of inspections and audits and the progress of the Preventive/Corrective actions and takes additional appropriate actions if necessary, according to the indications included in section 7 “Management Review” of the ESMS Manual.

During steady state operations, this Management Plan will be reviewed on an annual basis and any necessary revisions made to reflect the changing circumstances, operational needs or monitoring results. Revision of this Management Plan will be the responsibility of the HSE Manager, who is in charge of this Plan.

7.0 REPORTING

This section provides instructions and requirements for the reporting related to mitigation measures/actions, to monitoring activities and to internal auditing.

7.1 Reporting of the auditing activities

The correct implementation of this Management Plan is to be verified through internal audits to be carried out according to the requirements included in the “ESMS Manual”, the internal auditing procedure and section 6.0 “Audit and review” of this Management Plan.

Evidences of the implementation of the mitigation measures/actions (detailed in section 4), of the timely deployment of monitoring activities (detailed in section 5.0 and of related results are described in the audit reports. These audit reports must include the following minimum information/data:

- list of the items audited (detailed in sections 4.0 and 5.0);
- information whether the items have been implemented within the indicated timeline and frequency;

- achievement (or not) of the KPIs;
- description of non-compliances eventually identified.

7.2 Self-monitoring report

Monitoring data together with the results of the audit activities will be summarized in a Self-Monitoring Report on a quarterly basis that will be provided every quarter to the Lenders and eventually to stakeholders as further described in the “ESMS Manual”.



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Bajgora Wind Project

Cultural Heritage Management Plan (CH MP)

Submitted to:

SOWI Kosovo

Submitted by:

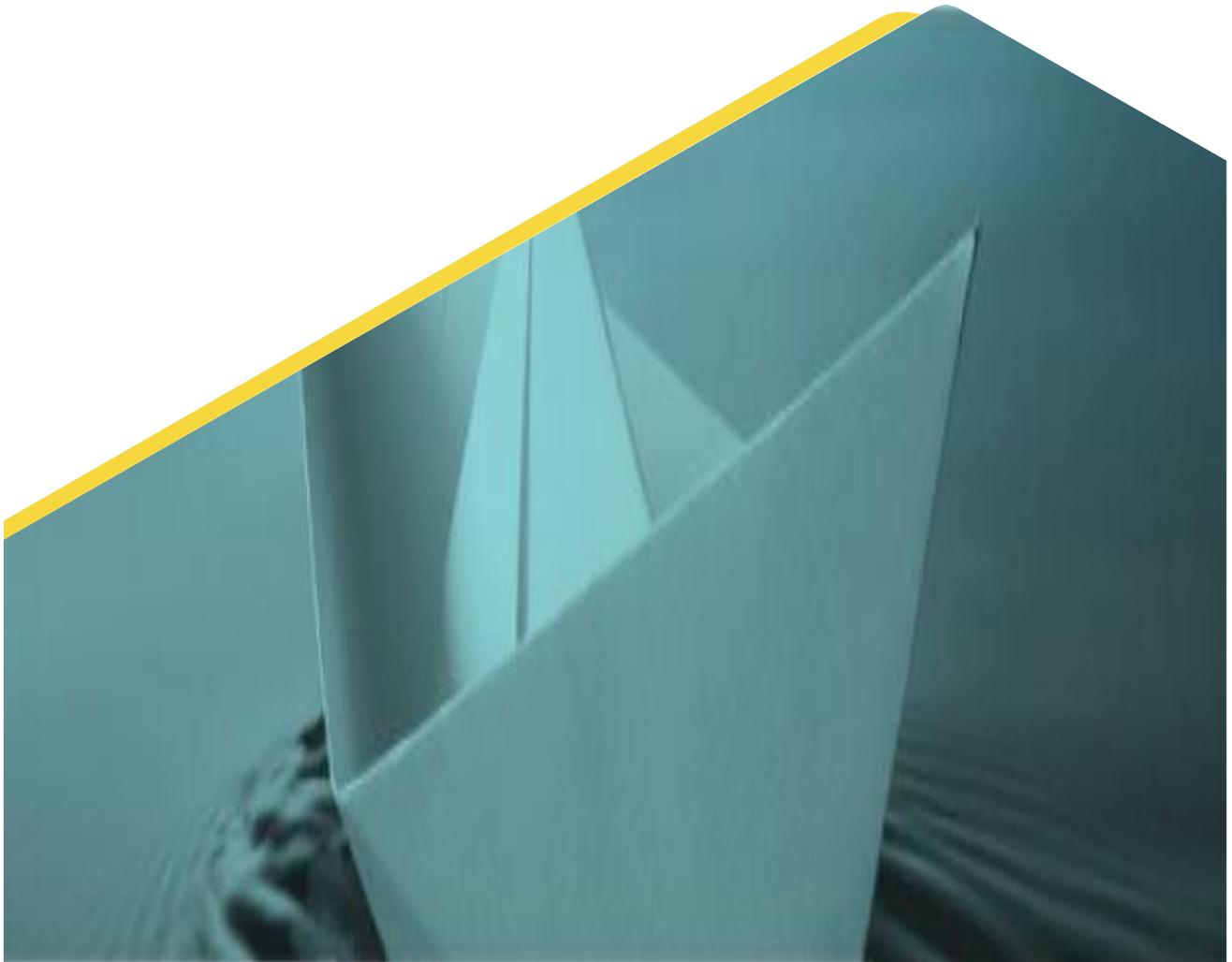
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19122298/12270 Final

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Acronyms

CH Cultural Heritage

ESMS Environmental and Social Management System

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KPI Key Performance Indicators

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HSE Health, Safety and Environment

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EPC Engineering Procurement and Construction

ERP Emergency Response Plan

EU European Union

ESHS Environmental, Social Health and Safety

ESMP(s) Environmental and Social Management Plan(s)

MP Management Plan

WF Wind Farm

OHL Overhead line

GIIP Good International Industry Practice

OHS Occupational Health and Safety

BAT Best Available Technology

ISO International Organization for Standardization

Client:	SOWI (Solar & Wind) Kosovo
Project:	Wind Farm Selac 1, 2 and 3 located near the village of Bajgora in the municipality of Mitrovica, in Northern Kosovo. It includes 20 km connection powerline.
Facilities:	The project consists of 27 WTGs type GE 3.8-137 with a capacity of 3.83 MW with a hub height of 110 m and total capacity of 103.41 MW. The energy will be connected to the existing grid through an 110kV overhead line (OHL), having approximately 20 km length. The power line is considered part of the Project during its construction and will be considered an associated facility for the operation phase.
EPC Contractor:	NOTUS
Site Management:	All key managerial roles involved in the Construction Site management and in the windfarm operation, mainly referring to the SOWI personnel.

Table of Contents

- 1.0 PURPOSE AND SCOPE2**
- 2.0 ROLES AND RESPONSIBILITIES.....3**
- 3.0 BACKGROUND POLICIES AND STANDARDS.....5**
 - 3.1 National standards and regulation5
 - 3.2 International standards.....5
 - 3.3 Project limit values6
- 4.0 MITIGATION MEASURES/ACTION6**
 - 4.1 Construction phase7
 - 4.2 Operation phase.....8
- 5.0 MONITORING ACTIONS.....10**
 - 5.1 Construction phase11
 - 5.2 Operation phase.....12
- 6.0 AUDIT AND REVIEW.....13**
- 7.0 REPORTING13**
 - Reporting of the monitoring activities13
 - Self-monitoring report14

TABLES

- Table 1: Roles and responsibilities3
- Table 2: National standards and regulations5
- Table 3: International standards5
- Table 4: Mitigation measures/actions for construction phase7
- Table 5: Mitigation measures for operation phase8
- Table 6: Monitoring actions11
- Table 7: Monitoring actions in the operation phase.....12

1.0 PURPOSE AND SCOPE

This Cultural Heritage (CH) Management Plan (MP) identifies and presents the framework and the strategy for implementing SOWI Environmental and Social Management System (ESMS) in relation to Cultural Heritage aspects.

It has been developed in accordance with SOWI policies, with the commitments undertaken in the ESIA, with Kosovo regulatory framework, with EBRD Environmental and Social Policy and Performance Requirements PR8, IFC Performance Standards PS8 and IFC General and Sector Specific EHS Guidelines.

This CH MP applies to both **construction phase** and **operation phase** of the Project. It provides also guidelines to the contractor in charge for the Engineering Procurement and Construction (EPC) activities of the Project for addressing Environmental and Social aspects according to the standards mentioned above.

Additional details related to the operation phase of the Project are expected to come in due course; it is therefore recommended that this plan is subject to a systematic review process before start of operations in order to encompass and consider any information relevant to the CH matters.

The Purpose of this MP is to define:

- Project standards for managing CH matters;
- the scope and applicable interphases for addressing CH management and monitoring activities;
- responsibilities, commitments, operating procedures and instructions for the implementation of this MP;
- the mitigation measures applicable to the Project in relation to CH aspects
- the monitoring activities performance in relation to CH aspects.

This MP applies to normal operating conditions during the construction activities and does not specifically address any emergency situation. Emergencies are addressed in a specific Emergency Response Plan (ERP).

The overall objective of this MP is to identify the mitigation and monitoring measures for the construction activities in order to:

- adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimize and restore impacts to the environment;
- develop and implement policies, plans and procedures to integrate environmental and social aspects within the overall project management framework throughout its lifecycle;
- establish a monitor program to assess the effects of residual impacts on the environment;
- report the results of the periodic audits and provide for corrective actions, if necessary, in order to reach the planned objectives.

2.0 ROLES AND RESPONSIBILITIES

Principal roles and responsibilities for the implementation of this plan are in Table 1 outlined below.

Table 1: Roles and responsibilities

Role	Overall responsibilities	Specific responsibilities
Management	<ul style="list-style-type: none"> ■ Management will ensure sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of actions, measures and monitoring activities under SOWI's responsibility. ■ This will include the selection of specialized contractor(s) for specific tasks to be carried out as part of the implementation of this Management Plan such as (but not limited to) CH management surveys, monitoring activities and data analysis and reporting; ■ designating specific personnel on site or at the administrative level, clearly define their roles and responsibilities within the environmental and social management system; 	<ul style="list-style-type: none"> ■ Final approval of this Management Plan and subcontractors' plans/procedures for the Project; ■ Taking appropriate actions to address major Non-Conformities based on audit reports, performance monitoring reports and on SOWI HSE Manager proposed approach
HSE Manager	<ul style="list-style-type: none"> ■ Ensuring that this Plan is up to date and appropriate to the nature and scale of the Project and ensuring that this Management Plan is implemented effectively; ■ Programming inspections and audit activities to ensure the correct implementation of this Management Plan; and of specialized contractor(s) tasks ■ Collecting, organizing and reviewing monitoring data and performance monitoring reports provided by the specialized contractor(s) and providing summary results of such reports to Management, to stakeholders and to the Lenders 	<ul style="list-style-type: none"> ■ Ensuring that action/measures and monitoring activities directly under SOWI responsibilities are carried out timely and adequately according to this Management Plan requirements; ■ addressing Non-Conformities through the definition of Preventive/Corrective actions proposing to Management, if necessary, amendments and/or updates to this Management Plan and issuing plan revisions; ■ bringing major Non-Conformities immediately to the attention of Management;

Role	Overall responsibilities	Specific responsibilities
EPC contractor and subcontractors	<ul style="list-style-type: none"> ■ effective execution of the specific tasks assigned in conformity with this Management Plan and with contractual arrangements; ■ respect of EHS requirements included in the ESMS; ■ agree with the timing and logistics of the monitoring activities 	<ul style="list-style-type: none"> ■ provide relevant monitoring data and monitoring reports to as indicated in this plan; ■ may propose changes and integrations to the monitoring activities included in the Management Plan; the proposed changes shall be evaluated and approved by HSE Manager and by Management.
All employees and contractors	<ul style="list-style-type: none"> ■ Comply with environmental management requirements. ■ Report any activities which are causing unnecessary biodiversity issues. 	<ul style="list-style-type: none"> ■ Give evidence that the relevant mitigation measures identified in the current CH management plan are being properly considered, implemented and monitored during execution of the works.

3.0 BACKGROUND POLICIES AND STANDARDS

This section includes all those policies, standards and requirements of reference for this Management Plan that are applicable to the Project during the construction phase.

This section includes references

- to applicable national laws and regulations, including those laws implementing host country obligations under international law and treaties;
- to the applicable international standards i.e. those issued by:
 - EBRD Performance Requirements (May 2014) and related guidance documents and EU Regulatory framework (EU Regulations and Directives).
 - IFC Performance Standards (2012) and EHS general and sector specific EHS Guidelines.

The project is expected to achieve whichever is more stringent amongst national standards and EBRD Performance Requirements (including EU Regulatory framework). The IFC General EHS Guidelines will be applicable in the absence of applicable Kosovo and EU standards.

3.1 National standards and regulation

Table 2: National standards and regulations

Kosovo Reg. Gaz. Date
Law no. 02/I-088
Law no. 03/I-025 on environmental protection
Regulation No.5/2008, Regulation on Registration, Documentation, Assessment and Selection of Cultural Heritage for Protection
Law no. 04/I-174 on spatial planning
Law no. 03/I-214 on environmental impact assessment
Law no.03/I –230 on strategic environmental assessment

3.2 International standards

Table 3: International standards

International standards
EBRD Environmental and Social Policy and Performance Requirements (PR)
EBRD PR8: Cultural Heritage
Directive 2014/60/UE
IFC Performance Standards (PS) and Guidance Notes (GN)
IFC PS8: Cultural Heritage

International standards
IFC GN8: Cultural Heritage
IFC General EHS Guidelines: § Construction and Decommissioning
IFC Industry Sector - EHS Guidelines: Environmental Health and Safety for Wind Energy § 1.1.1
IFC Industry Sector EHS Guidelines: for Electric Power Transmission and Distribution

3.3 Project limit values

There are no quantitative limit values to be applied. The CH management activities are subject to the IFC values included in the General EHS Guidelines.

4.0 MITIGATION MEASURES/ACTION

Based on the ESIA the potential impacts on environmental components deriving from CH management during the construction phase are:

- 1) Damage and destruction of cultural resources

The following table details the environmental management and mitigation measures/actions identified for CH management activities during construction phase. For each measure/action identified, the table shows:

- Item: the identification code of the mitigation measure/actions (ID.);
- Measure/Actions: description of the mitigation measure/ actions;
- Source document: is the reference to one or more applicable standard (i.e. National Regulation and Permits, EBRD Performance Requirements and related EU Regulations/Directives, IFC PS/Guidelines, or other GIIP);
- Timeline and frequency: frequency/timing of the measure/action;
- KPI (Key performance indicator): quantitative compliance indicator or qualitative acceptance criteria that can be used to verify the actual effectiveness of the mitigation measure/actions;
- Responsibility: resource responsible for implementing the measures/actions;
- WF/OHL: indication whether the measure/action is applicable to the Wind Farm (WF) and/or Overhead Line (OHL)

The aim of the “mitigation hierarchy” (avoidance, minimization, rehabilitation/restoration, offset) is applied for the selection of the measures to limit as far as possible negative impacts to the environment. This process is intended as an adaptive management system of the project, so that the mitigation and management approach will be adapted based on any new findings which could arise from the monitoring program described in the following section.

4.1 Construction phase

Table 4: Mitigation measures/actions for construction phase

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
CH01	<p><u>Avoidance:</u> Should an archaeological and cultural item be found on the Project Site during land excavations or any other construction activity, all the construction activities will be stopped immediately, and authorities will be contacted. Further construction activities will be conducted along with the instructions of the authorities.</p>	EBRD PR8 IFC PS8 §8 Environmental Health and Safety for Wind Energy § 1.1.1	During construction phase	-	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/O HL
CH02	<p><u>Minimization:</u> Prior to construction activities, awareness shall be enacted. The awareness activity shall be directed to construction management and workers mainly dealing with excavation activities. Constructions and physical interventions shall not be allowed on protected and cultural assets.</p>	EBRD PR8 IFC PS8 §8 Environmental Health and Safety for Wind Energy § 1.1.1	During construction phase	-	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/O HL
CH03	<p><u>Chance Find procedure:</u> In case of previously unknown archaeological finds are encountered, the following measures shall be put in place, consistently with the instruction given by the authorities:</p> <ul style="list-style-type: none"> ■ record keeping and expert verification procedures, ■ chain of custody instructions for movable finds, and ■ clear criteria for potential temporary work stoppages that could be required for rapid disposition of issues related to the finds. 	EBRD PR8 IFC PS8 §8 Environmental Health and Safety for Wind Energy § 1.1.1	During construction phase	-	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/O HL

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> In case of previously unknown archaeological finds are encountered the Affected Communities will be consulted as part of the Stakeholder Engagement Plan (SEP), to incorporate into the decision-making process the views of the Affected Communities. 					

4.2 Operation phase

Table 5: Mitigation measures for operation phase

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
CH04	<p>Avoidance:</p> <p>Should an archaeological and cultural item be found on the Project Site during operations or maintenance activity, all the activities will be stopped immediately, and authorities will be contacted. Further activities will be conducted along with the instructions of the authorities</p>	EBRD PR8 IFC PS8 §8 Environmental Health and Safety for Wind Energy § 1.1.1	During operation phase	-	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/O HL
CH05	<p>Minimization:</p> <p>Prior to operation phase and before each maintenance activity, awareness shall be enacted. The awareness activity shall be directed to management and workers. physical interventions shall not be allowed on protected and cultural assets.</p>	EBRD PR8 IFCPS8 §8 Environmental Health and Safety for Wind Energy § 1.1.1	During operation phase	-	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/O HL

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
CH06	<p><u>Chance Find procedure:</u></p> <p>In case of previously unknown archaeological finds are encountered, the following measures shall be put in place, consistently with the instruction given by the authorities:</p> <ul style="list-style-type: none"> ■ record keeping and expert verification procedures, ■ chain of custody instructions for movable finds, and ■ clear criteria for potential temporary work stoppages that could be required for rapid disposition of issues related to the finds. <p>In case of previously unknown archaeological finds are encountered the Affected Communities will be consulted as part of the Stakeholder Engagement Plan (SEP), to incorporate into the decision-making process the views of the Affected Communities</p>	<p>EBRD PR8 IFC PS8 §8 Environmental Health and Safety for Wind Energy § 1.1.1</p>	<p>During operation phase</p>	<p>-</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	<p>WF/O HL</p>

5.0 MONITORING ACTIONS

The following table details the monitoring actions identified for CH management activities during the construction phase. The aim of the monitoring actions is to verify whether the residual impacts are under control and the mitigation measures/action have been effective.

For each monitoring measure/action identified, the table shows:

- Item: the identification code of the monitoring activity (ID.);
- Monitoring Activity: description of the monitoring activity;
- Source document: is the reference to one or more applicable standard or limit value (i.e. National Regulation and Permits, EBRD Performance Requirements and related EU Regulations/Directives, IFC PS/Guidelines, or other GIIP);
- Timeline and frequency: frequency/timing of the monitoring activity;
- KPI (Key performance indicator): regulatory limit value or qualitative acceptance criteria to comply with;
- Responsibility: resource responsible for implementing the monitoring activity;
- WF/OHL: indication whether the measure/action is applicable to the Wind Farm (WF) and/or Overhead Line (OHL)

5.1 Construction phase

Table 6: Monitoring actions

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF/OHL
CH07	Availability of records on any archaeological findings;	EBRD PR8 IFC PS8 §8 Environmental Health and Safety for Wind Energy § 1.1.1	During construction phase	Annual record	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL
CH08	Main figures regarding archaeological awareness information provided to workers'	EBRD PR8 IFC PS8 §8 Environmental Health and Safety for Wind Energy § 1.1.1	During construction phase	Responsible figures disclosure	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL
CH09	Contractors and Subcontractors selection process in place	EBRD PR8 IFC PS8 §8 Environmental Health and Safety for Wind Energy § 1.1.1	During construction phase	Documentation contractor's selection	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL
CH10	<ul style="list-style-type: none"> ■ Collection, aggregation and recording of the data ■ Communication of the data 	EBRD PR8 IFC PS8 §8 Environmental Health and Safety for Wind Energy § 1.1.1	During construction phase	Data acquisition	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL

5.2 Operation phase

Table 7: Monitoring actions in the operation phase

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF/OHL
CH11	Availability of records on any archaeological findings	EBRD PR8 IFC PS8 §8 Environmental Health and Safety for Wind Energy § 1.1.1	During operation phase	Annual record	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL
CH12	Main figures regarding archaeological awareness information provided to workers'	EBRD PR8 IFC PS8 §8 Environmental Health and Safety for Wind Energy § 1.1.1	During operation phase	Responsible figures disclosure	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL
CH13	Contractors and Subcontractors selection process in place	EBRD PR8 IFC PS8 §8 Environmental Health and Safety for Wind Energy § 1.1.1	During operation phase	Documentation contractor's selection	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL
CH14	<ul style="list-style-type: none"> ■ Collection, aggregation and recording of the data ■ Communication of the data 	EBRD PR8 IFC PS8 §8 Environmental Health and Safety for Wind Energy § 1.1.1	During operation phase	Data	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL

6.0 AUDIT AND REVIEW

The correct implementation of this Management Plan is verified through internal inspections and audits to be carried out according to the requirements included in section “Internal audit” of the “ESMS Manual” and in the “Audit and Non-Conformities Procedure”.

The schedule, the frequency, the scope and objectives of the audit as well as the responsible internal auditors are indicated in the Audit Program that is developed and updated by SOWI.

Internal auditing shall address:

- The correct implementation of this Management Plan
- The correct development and implementation of Contractor’s Plan
- The correct and timely implementation of an auditing and review system by the Contractor
- Each of the point indicated in the tables in section 4.0(mitigation measures/actions) and 5.0(monitoring activities) of this plan the establishment of a stakeholder engagement process related to the aspects addressed by this Management Plan.

Evidences and results of the inspection and audit activities are included in the audit reports and in the “Non-Conformity and Preventive/Corrective actions” records.

SOWI Management reviews results of inspections and audits and the progress of the Preventive/Corrective actions and takes additional appropriate actions if necessary, according to the indications included in section 7 “Management Review” of the ESMS Manual.

During steady state operations, this Management Plan will be reviewed on an annual basis and any necessary revisions made to reflect the changing circumstances, operational needs or monitoring results. Revision of this Management Plan will be the responsibility of the HSE Manager, who is in charge of this Plan.

7.0 REPORTING

This section provides instructions and requirements for the reporting related to mitigation measures/actions, to monitoring activities and to internal auditing.

Reporting of the monitoring activities

Evidences and results of the monitoring activities (detailed in section 5.0) have to be described in detail in appropriate monitoring reports. Reporting of the auditing activities

The correct implementation of this Management Plan is to be verified through internal audits to be carried out according to the requirements included in the “ESMS Manual”, the internal auditing procedure and section 6.0 “Audit and review” of this Management Plan.

Evidences of the implementation of the mitigation measures/actions (detailed in section 4.0), of the timely deployment of monitoring activities (detailed in section 5.0) and of related results are described in the audit reports. These audit reports must include the following minimum information/data:

- list of the items audited (detailed in sections 4.0 and 5.0);
- information whether the items have been implemented within the indicated timeline and frequency;
- achievement (or not) of the KPIs;
- description of non-compliances eventually identified.

Self-monitoring report

Monitoring data together with the results of the audit activities will be summarized in a Self-Monitoring Report on a quarterly basis that will be provided every quarter to the Lenders and eventually to stakeholders as further described in the “ESMS Manual”.



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Bajgora Wind Project

Human Resources and Labor Procedures Management Plan (HRLP MP)

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SOWI Kosovo

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19122298/12272 Final

October 3rd, 2019



Acronyms and Definitions

HRLP Human resources and Labor Procedures

ESMS Environmental and Social Management System

EBRD European Bank for Reconstruction and Development

IFC International Finance Corporation

KPI Key Performance Indicators

PR Performance Requirement (issued by EBRD)

PS Performance Standard (issued by IFC)

HSE Health, Safety and Environment

ESIA Environmental and Social Impact Assessment

EPC Engineering Procurement and Construction

ERP Emergency Response Plan

EU European Union

ESHS Environmental, Social Health and Safety

ESMP(s) Environmental and Social Management Plan(s)

MP Management Plan

WF Wind Farm

OHL Overhead line

GIIP Good International Industry Practice

OHS Occupational Health and Safety

BAT Best Available Technology

ISO International Organization for Standardization

Client:	SOWI (Solar & Wind) Kosovo
Project:	Wind Farm Selac 1, 2 and 3 located near the village of Bajgora in the municipality of Mitrovica, in Northern Kosovo. It includes 20 km connection powerline.
Facilities:	The project consists of 27 WTGs type GE 3.8-137 with a capacity of 3.83 MW with a hub height of 110 m and total capacity of 103.41 MW. The energy will be connected to the existing grid through an 110kV overhead line (OHL), having approximately 20 km length. The power line is considered part of the Project during its construction and will be considered an associated facility for the operation phase.
EPC Contractor:	NOTUS
Site Management:	All key managerial roles involved in the Construction Site management, mainly referring to the NOTUS personnel and to SOWI management.

Table of Contents

- 1.0 PURPOSE AND SCOPE3**
- 2.0 ROLES AND RESPONSIBILITIES.....5**
- 3.0 BACKGROUND POLICIES AND STANDARDS.....7**
 - 3.1 National standards and regulation7
 - 3.2 International standards.....7
 - 3.3 Project limit values8
- 4.0 MITIGATION MEASURES/ACTION17**
 - 4.1 Construction18
 - 4.2 Operations.....20
- 5.0 MONITORING ACTIONS.....22**
 - 5.1 Construction23
 - 5.2 Operation.....24
- 6.0 AUDIT AND REVIEW.....26**
- 7.0 REPORTING26**
 - 7.1 Reporting of the monitoring activities26
 - 7.2 Self-monitoring report.....27

TABLES

- Table 1: Roles and responsibilities5
- Table 2: National standards and regulations7
- Table 3: International standards7
- Table 4: Project limit values.....9
- Table 5: Mitigation measures/actions for construction phase18
- Table 6: Mitigation measures for operation phase20
- Table 7: Monitoring actions for construction phase23
- Table 8: Monitoring actions for operation phase24

1.0 PURPOSE AND SCOPE

This Human Resources and Labour Procedures (HRLP) Management Plan (MP) identifies and presents the framework and the strategy for implementing SOWI Environmental and Social Management System (ESMS) in relation to Human resources and Labour procedures aspects.

It has been developed in accordance with SOWI policies, with the commitments undertaken in the ESIA, with Kosovo regulatory framework, with EBRD Environmental and Social Policy and Performance Requirements PR2, IFC Performance Standards PS2, and IFC General and Sector Specific EHS Guidelines.

This HRLP MP applies both to **construction phase** and **operation phase** of the Project. It provides also guidelines to the contractor in charge for the Engineering Procurement and Construction (EPC) activities of the Project for addressing Environmental and Social aspects according to the standards mentioned above.

Additional details related to the operation phase of the Project are expected to come in due course; it is therefore recommended that this plan is subject to a systematic review process before start of operations in order to encompass and consider any information relevant to the HRLP matters.

The Purpose of this MP is to protect the fundamental rights of workers and to present the minimum requirements of the employment process, and to define:

- Project standards for managing HRLP matters during construction phase;
- the scope and applicable interphases for the management of addressing HRLP management and monitoring activities during the construction phase;
- responsibilities, commitments, operating procedures and instructions for the implementation of this MP;
- the mitigation measures applicable to the Project in relation to HRLP aspects;
- and manage the monitoring activities performance in relation to HRLP aspects.

In addition, the plan aims to ensure that:

- workers are informed of their labour rights;
- any agreements with worker's organizations in force are respected and compliance with national labour laws is assured for any workers employed directly by the Project, SOWI or Subcontractors or third parties;
- workers' accommodation is managed in line with IFC and EBRD specific requirements;
- compliance with national and international requirements of Non-Discrimination and Equal Opportunity;
- retrenchment issues are dealt with in compliance with national and international requirements;
- requirements related to child labour and forced labour are complied with;
- a dedicated grievance mechanism for workers is developed, disclosed and implemented;
- the recruit process is non-discriminatory, transparent, open to all and fair.

This MP applies to normal operating conditions during the construction and operation activities and does not specifically address any emergency situation. Emergencies are addressed in a specific Emergency Response Plan (ERP).

The overall objective of this MP is to identify the mitigation and monitoring measures in order to:

- adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimize and restore impacts to the environment;
- develop and implement policies, plans and procedures to integrate environmental and social aspects within the overall project management framework throughout its lifecycle;
- establish a monitor program to assess the effects of residual impacts on the environment;
- report the results of the periodic audits and provide for corrective actions, if necessary, in order to reach the planned objectives.

2.0 ROLES AND RESPONSIBILITIES

Principal roles and responsibilities for the implementation of this plan are in Table 1 outlined below.

Table 1: Roles and responsibilities

Role	Overall responsibilities	Specific responsibilities
Management	<ul style="list-style-type: none"> ■ ensuring that this Plan is up to date and appropriate to the nature and scale of the Project and ensuring that this Management Plan is implemented effectively by NOTUS ■ ensuring that action/measures and monitoring activities directly under SOWI responsibilities are carried out timely and adequately 	<ul style="list-style-type: none"> ■ programming inspections and audit activities to ensure the correct implementation of this Management Plan ■ collecting, organizing and reviewing monitoring data and performance monitoring reports provided by SOWI.
HSE Manager	<ul style="list-style-type: none"> ■ Ensure that all the activities of the Project are carried out in accordance with this Management Plan ■ Ensure the planning, preparation and provision of the trainings in order to enable the full implementation of this plan. ■ Warning signboards ■ Checking the hygiene conditions, conditions of the equipment and appliances; ■ Ensure that the employment relationships will be based on the principle of equal opportunity and fair treatment. ■ Ensure that no child labour or forced labour will be made for Project activities. ■ Ensure that priority will be given to the recruitment of local workforce. 	<ul style="list-style-type: none"> ■ Report to non-conformities to the subcontractors and ensure the non-conformities will be solved as soon as possible. ■ Record and investigate all external grievances and ensure they are solved in a proper timeframe. For the ones that cannot be solved by NOTUS, communicate it to the SOWI HSE Manager.

Role	Overall responsibilities	Specific responsibilities
	<ul style="list-style-type: none"> ■ Ensure that workers will not be discouraged from electing worker representatives, forming or joining workers' organizations of their choosing, or from bargaining collectively. 	
<p>EPC contractor and subcontractors</p>	<ul style="list-style-type: none"> ■ NOTUS will ensure sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of this Management Plan, including the Workers' Grievances Mechanism. ■ If any Subcontractor is involved, it is responsible for duly implementing the same requirements included in SOWI Plans/Procedures under the supervision of NOTUS. ■ NOTUS will implement a workers' grievance mechanism in line with the principles for its workers' grievances. 	<ul style="list-style-type: none"> ■ NOTUS will provide relevant monitoring data and monitoring reports to SOWI. ■ Manager(s) will be appointed and communicated in order to manage all workers' issues related to the accommodation.
<p>All employees and contractors</p>	<ul style="list-style-type: none"> ■ Comply with HRLP management requirements. ■ Report any activities which are causing issues. 	<ul style="list-style-type: none"> ■ Give evidence that the relevant mitigation measures identified in the current HRLP management plan are being properly considered, implemented and monitored during execution of the works.

3.0 BACKGROUND POLICIES AND STANDARDS

This section includes all those policies, standards and requirements of reference for this Management Plan that are applicable to the Project during the construction phase.

This section includes references

- to applicable national laws and regulations, including those laws implementing host country obligations under international law and treaties;
- to the applicable international standards i.e. those issued by:
 - EBRD Performance Requirements (May 2014) and related guidance documents and EU Regulatory framework (EU Regulations and Directives).
 - IFC Performance Standards (2012) and EHS general and sector specific EHS Guidelines.

The project is expected to achieve whichever is more stringent amongst national standards and EBRD Performance Requirements (including EU Regulatory framework). The IFC General EHS Guidelines will be applicable in the absence of applicable Kosovo and EU standards.

3.1 National standards and regulation

Table 2: National standards and regulations

Kosovo Reg. Gaz. Date
Law No.03/L –212 on Labour
Law No 04/L-161 on Safety and Health at Work
Law No. 04/L-219 on Foreigners
Law No.05/L-023 on Breastfeeding
Law No. 04/L-011 on Organizing trade union in Kosovo
Law No. 03/L-200 on Strikes
Law No. 04/L-006 on Social Economic Council
Law No. 2002/9 on Labour inspectorate

3.2 International standards

Table 3: International standards

International standards
EBRD Environmental and Social Policy and Performance Requirements (PR)
EBRD PR2: Labor and Working Conditions
Directive 2003/88 / EC of the European Parliament and of the Council of 4 November 2003 concerning certain aspects of the organization of working time

International standards
Directive 89/391/EEC
IFC Performance Standards (PS) and Guidance Notes (GN)
IFC PS2: Labor and Working Conditions
IFC GN2: Labor and Working Condition
IFC General EHS Guidelines: § 2 Occupational Health and Safety
IFC General EHS Guidelines: § 4 Construction and Decommissioning
IFC Industry Sector Guidelines: EHS Guidelines for Wind Energy § 1.2
IFC Industry Sector Guidelines: EHS Guidelines for Electric Power Transmission and Distribution

3.3 Project limit values

Despite there are no quantitative limit values to be applied, the HRLP management activities are subject to the specific standards presented in the table below. During the Construction phase of the Project temporary and permanent workforce will be employed NOTUS, and other contractors.

On the employment of the workforce will be applicable the following national laws and regulations, IFC requirements, in particular the IFC PS2 "Labor and Working Conditions", EBRD requirements, in particular the EBRD PR2 "Labor and Working Conditions and IFC/EBRD Guidance on Workers' Accommodation

Table 4: Project limit values

Working procedure	Applicable standard		
	EU*, **	Kosovo	Project Standard (more stringent will apply)
General aspect working conditions and terms of employment			Workers will be provided with documented information that is clear and understandable, regarding their rights under national labour and employment law and any applicable collective agreements, including their rights related to hours of work, wages, overtime, compensation, and benefits upon beginning the working relationship and when any material changes occur.
Working conditions and terms of employment		Collective bargaining agreement with workers' organizations (if any)	Working conditions and terms of employment (e.g. wages and benefits, wage deductions, hours of work, overtime arrangements and overtime compensation, breaks, rest days, and leave for illness, maternity, vacation or holiday) set out in the below items will be respected
Employment contract			An employment contract is deemed to have been made for an indefinite period when the employment relationship is not based on a fixed term. An employment contract for a definite period is one that is concluded between the employer and the employee in written form, which has a specified term, or which is based on the emergence of objective conditions like the completion of the required task or another condition specified within the contract
Recruitment of local workforce			Priority will be given, to the extent feasible, to the recruitment of local workforce, in order to maximize local socioeconomic benefits. The related details are given in the "Supply Chain Management Plan"
Migrant workers			Migrant workers (if any) will be identified and it will be ensured that they are engaged on substantially equivalent terms and conditions to non-migrant workers carrying out similar work

Working procedure	Applicable standard		
	EU*, **	Kosovo	Project Standard (more stringent will apply)
Foreign workers		<p>Individuals who are sent to Kosovo (if any) for a job by or on behalf of an organization established in a foreign country and whose documents are to be subject to social insurance in the foreign country, and among those who work in Kosovo with his/her own name and who reside abroad and are subject to the social security legislation of that country are not deemed to be insurance holders.</p> <p>Unless otherwise provided in the bilateral or multilateral agreements to which Kosovo is a party, the foreigners are obliged to get permission before they start to work dependently or independently in Kosovo</p>	<p>Provisions regarding the individuals deemed to be insurance holders as per item (a) of the first paragraph of Social Security Law will also be applicable to foreigners who work on service contract, excluding the citizens of countries with which international social security contract is entered based on reciprocity principle</p>
Workers' Accommodation			<p>Accommodation of the workforce will be in compliance with applicable national laws and regulations and with IFC and EBRD requirements (in particular with IFC PS2 and EBRD PR2 - Labour and Working Conditions) and with IFC/EBRD Guidance on Workers' accommodation.</p>
Representation			<p>Workers will not be discouraged from electing worker representatives, forming or joining workers' organizations of their choosing, or from bargaining collectively. Workers who participate, or seek to participate, in such organizations and collective bargaining will not be discriminated or retaliated against.</p>

Working procedure	Applicable standard		
	EU*, **	Kosovo	Project Standard (more stringent will apply)
			<p>NOTUS will engage with such workers' representatives and workers' organizations and provide them with information needed for meaningful negotiation in a timely manner.</p> <p>Workers' organizations are expected to fairly represent the workers in the workforce</p>
Non-discrimination		<p>Employment decisions will not be made on the basis of personal characteristics (such as gender, race, nationality, ethnic, social and indigenous origin, religion or belief, disability, age, or sexual orientation) unrelated to inherent job requirements</p> <p>No discrimination based on language, race, sex, political opinion, philosophical belief, religion and sex or similar reasons is permissible in the employment relationship</p>	<p>Employment relationships will be based on the principle of equal opportunity and fair treatment, no discrimination will be made with respect in any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignments, promotion, termination of employment or retirement, and disciplinary practices;</p> <p>Measures will be taken to prevent and address harassment, intimidation, and/or exploitation, especially in regard to women; and the principles of non-discrimination will apply to migrant workers.</p> <p>An employee working under an employment contract for a definite period will not be subjected to differential treatment in relation to a comparable employee working under an employment contract for an indefinite period</p>
End of Work Contract – Retrenchment			<p>Prior to implementing any collective dismissals, an analysis of alternatives to retrenchment will be carried out.</p> <p>If the analysis does not identify viable alternatives to retrenchment, a retrenchment procedure will be developed and implemented to reduce the adverse impacts of retrenchment on workers. The retrenchment procedure will be based on the principle of non-discrimination and will reflect consultation with workers, their organizations, and, where appropriate, the government, and comply with collective bargaining agreements (if they exist).</p>

Working procedure	Applicable standard		
	EU*, **	Kosovo	Project Standard (more stringent will apply)
			<p>All legal and contractual requirements related to notification of public authorities, and provision of information to and consultation with workers and their organizations will have to be complied with.</p> <p>In such a case, all workers will receive notice of dismissal and severance payments mandated by law and collective agreements in a timely manner. All outstanding back pay and social security benefits and pension contributions and benefits will be paid:</p> <ol style="list-style-type: none"> 1.on or before termination of the working relationship to the workers, 2.where appropriate, for the benefit of the workers, or 3.payment will be made in accordance with a timeline agreed through a collective agreement. Where payments are made for the benefit of workers, workers will be provided with evidence of such payments. <p>The notice of contract termination will be given by the employer in written form involving the reason for termination which must be specified in clear and precise terms.</p> <p>Before terminating a continual employment, contract made for an indefinite period, a notice to the other party must be served by the terminating party.</p> <p>The employer, who terminates the contract of an employee engaged for an indefinite period, who is employed in an establishment with thirty or more workers and who meets a minimum seniority of six months, must depend on a valid reason for such termination connected with the capacity or conduct of the employee or based on the operational requirements of the establishment or service.</p>
Workers Engaged by Third Parties			With respect to workers contracted by third parties, a commercially reasonable effort will be taken to ascertain that the third parties are reputable and legitimate

Working procedure	Applicable standard		
	EU*, **	Kosovo	Project Standard (more stringent will apply)
			<p>enterprises and have an appropriate ESMS that will allow them to operate in a manner consistent with the requirements of IFC PS2 and EBRD PRs.</p> <p>Performance of the third party shall be monitored through audit as indicated further in this Plan by both SOWI and NOTUS.</p>
Child labor and Forced labor		<p>Therefore, the Kosovo Regulation on the “Procedures and Principles of the Employment of Children's and Young Workers” will not apply.</p>	<p>No workers under the age of 18 will be employed. No forced labour will be employed or tolerated.</p> <p>(Forced labour consists of any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty. This covers any kind of involuntary or compulsory labour, such as indentured labour, bonded labour, or similar labour-contracting arrangements.).</p> <p>Child labour and forced labour requirements set out above (IFC PS2 §21-22) are extended, as far as possible, to primary supply chain and these requirements are addressed by the “Supply Chain Management Plan”.</p>
Working Hours		<p>Regarding working hours and conditions, NOTUS will comply with the Kosovo laws and regulations. According to the Regulation on Working Duration Related to Labour Law, the maximum working duration is 45 hours a week, and the daily working duration cannot exceed 11 hours in any case.</p> <p>All limits in Kosovo law regarding excess work will be followed, including the annual</p>	

Working procedure	Applicable standard		
	EU*, **	Kosovo	Project Standard (more stringent will apply)
		<p>excess work hour limits. According to Regulation on Excess Work and Work in Excess Periods, excess work is defined as “those works that exceed 45 hours a week”, and work in excess periods is defined as “those works that are lower than 45 hours a week according to a contract and when the work exceeds this working period set in the contract and becomes 45 hours a week”. Pursuant to article 4 of the subject regulation, the wage for each hour of the excess work is paid by increasing the hourly wage of normal working condition by 50%, and the wage for each hour of the work in excess periods is paid by increasing the hourly wage of normal working condition by 25%.</p>	
Workforce grievances process		<p>The H&S Committee formed in compliance with Kosovo Legal Requirements represents a medium for workers to report any concern or complaint on their working environment</p>	<p>NOTUS will ensure that a mechanism is in place to manage the grievances raised by the workers (including, but not limited to, reporting of HSE concerns to the management) throughout the life cycle of the Project. Grievances from NOTUS workers will be managed directly by NOTUS Management in coordination with the NOTUS HSE Department (for OHS issues) and the NOTUS HR Department (for labour and working or accommodation issues); while grievances from subcontractor and contractors’ workers will be managed by each party. In cases where the subcontractors are not able to provide a grievance mechanism NOTUS will extend its own grievance mechanism to serve workers engaged by the third</p>

Working procedure	Applicable standard		
	EU*, **	Kosovo	Project Standard (more stringent will apply)
			<p>party. The results of subcontractor grievances and their follow-up will be reported to NOTUS through the implementation of a similar procedure.</p> <p>The principles underlying the Workers Grievance Mechanism are the same presented for the Grievance Mechanism designed to register the grievances with the public. In addition, workers will be guaranteed that the use of the grievance mechanism will not affect in any way their working rights and will not result in retribution.</p> <p>Disclosure of this mechanism will be made to workers during the recruitment phases and during induction training under responsibility of the HSE Department. An appropriate number of channels will be provided to workers to submit their grievances:</p> <ul style="list-style-type: none"> •Written submission by mail or e-mail, •Written or oral submission directly to the HSE manager and to workers' representatives, •Written submission in collection box, and •Written or oral submission to the HS Committee. <p>Grievance forms may be submitted through grievance boxes installed at various points inside the construction site (dining hall, etc.) and Grievance boxes will be controlled every week.</p> <p>Once a grievance is received (whether it be orally or written), the HSE Department will register and record the grievance similarly to external grievances, informing the complainant that it has been received. A specific database will be set up for workers' grievances.</p> <p>The HSE Department then will assess the nature of the grievance, possibly communicating with the complainant to ensure that the issue clearly understood. Resolution procedures will be kept as simple as possible and it is expected that</p>

Working procedure	Applicable standard		
	EU*, **	Kosovo	Project Standard (more stringent will apply)
			<p>most grievances can be solved through an informal discussion, such as a meeting between a worker and involved parties. If the initial steps do not lead to a resolution that is acceptable for the workers, a higher level of management should be involved in order to find an agreed solution.</p> <p>Once an agreed solution for the grievance has been established, the HSE Department notifies the worker on the proposed corrective action and the timeframe for implementing the action. Once the agreement has been accepted, the grievance can be closed and registered by the HSE Department.</p> <p>The outcomes of the Workers Grievance Mechanism process will be regularly reported both internally and externally. Data and information on the Workers Grievance Mechanism will be included in the periodical reports under a specific heading, prepared in line with the reporting system of the rest of the document. As mentioned, grievances are confidential therefore any information will be presented anonymously with no reference to the workers.</p> <p>The mechanism will not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.</p>

4.0 MITIGATION MEASURES/ACTION

Based on the ESIA the potential impacts on components deriving from HRLP management during the construction phase are:

- Demand for workforce
- Demand for goods, materials and services

The following table details the environmental management and mitigation measures/actions identified for HRLP management activities during construction phase. For each measure/action identified, the table shows:

- Item: the identification code of the mitigation measure/actions (ID.);
- Measure/Actions: description of the mitigation measure/ actions;
- Source document: is the reference to one or more applicable standard (i.e. National Regulation and Permits, EBRD Performance Requirements and related EU Regulations/Directives, IFC PS/Guidelines, or other GIIP);
- Timeline and frequency: frequency/timing of the measure/action;
- KPI (Key performance indicator): quantitative compliance indicator or qualitative acceptance criteria that can be used to verify the actual effectiveness of the mitigation measure/actions;
- Responsibility: resource responsible for implementing the measures/actions;
- WF/OHL: indication whether the measure/action is applicable to the Wind Farm (WF) and/or Overhead Line (OHL)

The aim of the “mitigation hierarchy” (avoidance, minimization, rehabilitation/restoration, offset) is applied for the selection of the measures to limit as far as possible negative impacts to the environment.

This process is intended as an adaptive management system of the project, so that the mitigation and management approach will be adapted based on any new findings which could arise from the monitoring program described in the following section.

4.1 Construction

Table 5: Mitigation measures/actions for construction phase

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF / OHL
HRLP 01	<p>Avoidance</p> <ul style="list-style-type: none"> ■ Put in place transparent and fair recruitment procedures. HR policies and management will ensure: <ul style="list-style-type: none"> ■ Non-discrimination and equal opportunities to all workers; ■ Compliance with national laws and international standards regarding employment of minors; ■ Avoidance of any form of forced labour; 	EBRD PR 2 IFC PS 2 EHS Guidelines for Wind Energy § 1.2 GIIP	During construction phase	Transparent and fair recruitment procedures in place	NOTUS to record and provide data to SOWI SOWI for collecting data	WF / OHL
HRLP 02	<p>Minimization</p> <ul style="list-style-type: none"> ■ Ensure that all non-employee workers are engaged in line with both national legislation and applicable international (ILO) standards and recommendations ■ Provide clear and transparent information on wages, benefits and working conditions; ■ Ensure that workers are not discouraged from forming or joining workers' organisations; ■ Provide workers with a safe and healthy work environment; 	EBRD PR 2 IFC PS 2 EHS Guidelines for Wind Energy § 1.2 GIIP	During construction phase	Number of non-employee workers engaged in line with both national legislation and applicable international (ILO) standards and recommendations	NOTUS to record and provide data to SOWI SOWI for collecting data	WF / OHL

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF / OHL
	<ul style="list-style-type: none"> Provide clear and transparent information on wages, benefits and working conditions; 					
HRLP 03	<ul style="list-style-type: none"> Implement a training programme for the local workforce to enable them to take advantage of the opportunity Contractors will be contractually required to maximise use of local workforce in the Project; 	EBRD PR 2 IFC PS 2 EHS Guidelines for Wind Energy § 1.2 GIIP	During construction phase	Number and % of local workforce	NOTUS to record and provide data to SOWI SOWI for collecting data	
HRLP 04	<ul style="list-style-type: none"> Implement a grievance mechanism open to workers. Ensure that all workers directly and indirectly employed are informed about this channel to submit grievances. Ensure that the grievance mechanism is managed in line with indications of the SEP and that appropriate budget and resources are assigned. 	EBRD PR 2 IFC PS 2 EHS Guidelines for Wind Energy § 1.2 GIIP	Quarterly	Number % of grievances responded and solved within timeframe	NOTUS will record and provide figures regarding employment of woman workforce to SOWI SOWI for collecting data	WF / OHL
HRLP 05	<ul style="list-style-type: none"> Capacity of managing and resolving recurrent workers grievances of similar nature 	EBRD PR 2 IFC PS 2 EHS Guidelines for Wind Energy § 1.2 GIIP	As needed	Trend of grievances of similar nature over time	NOTUS will record and provide figures regarding employment of woman workforce to SOWI SOWI for collecting data	WF / OHL

4.2 Operations

Table 6: Mitigation measures for operation phase

HRLP06	<p>Avoidance</p> <ul style="list-style-type: none"> ■ Put in place transparent and fair recruitment procedures. HR policies and management will ensure: <ul style="list-style-type: none"> ■ Non-discrimination and equal opportunities to all workers; ■ Compliance with national laws and international standards regarding employment of minors; ■ Avoidance of any form of forced labour; 	<p>EBRD PR 2 IFC PS 2 EHS Guidelines for Wind Energy § 1.2 GIIP</p>	<p>During construction phase</p>	<p>Transparent and fair recruitment procedures in place</p>	<p>NOTUS to record and provide data to SOWI</p> <p>SOWI for collecting data</p>	<p>WF / OHL</p>
HRLP07	<p>Minimization</p> <ul style="list-style-type: none"> ■ Ensure that all non-employee workers are engaged in line with both national legislation and applicable international (ILO) standards and recommendations ■ Provide clear and transparent information on wages, benefits and working conditions; ■ Ensure that workers are not discouraged from forming or joining workers' organisations; ■ Provide workers with a safe and healthy work environment; 	<p>EBRD PR 2 IFC PS 2 EHS Guidelines for Wind Energy § 1.2 GIIP</p>	<p>During construction phase</p>	<p>Number of non-employee workers engaged in line with both national legislation and applicable international (ILO) standards and recommendations</p>	<p>NOTUS to record and provide data to SOWI</p> <p>SOWI for collecting data</p>	<p>WF / OHL</p>

	<ul style="list-style-type: none"> Provide clear and transparent information on wages, benefits and working conditions; 					
HRLP08	<ul style="list-style-type: none"> Implement a training programme for the local workforce to enable them to take advantage of the opportunity Contractors will be contractually required to maximise use of local workforce in the Project; 	EBRD PR 2 IFC PS 2 EHS Guidelines for Wind Energy § 1.2 GIIP	During construction phase	Number and % of local workforce	NOTUS to record and provide data to SOWI SOWI for collecting data	
HRLP09	<ul style="list-style-type: none"> Implement a grievance mechanism open to workers. Ensure that all workers directly and indirectly employed are informed about this channel to submit grievances. Ensure that the grievance mechanism is managed in line with indications of the SEP and that appropriate budget and resources are assigned. 	EBRD PR 2 IFC PS 2 EHS Guidelines for Wind Energy § 1.2 GIIP	Quarterly	Number % of grievances responded and solved within timeframe	NOTUS will record and provide figures regarding employment of woman workforce to SOWI SOWI for collecting data	WF / OHL
HRLP10	<ul style="list-style-type: none"> Capacity of managing and resolving recurrent workers grievances of similar nature 	EBRD PR 2 IFC PS 2 EHS Guidelines for Wind Energy § 1.2 GIIP	As needed	Trend of grievances of similar nature over time,	NOTUS will record and provide figures regarding employment of woman workforce to SOWI SOWI for collecting data	WF / OHL

5.0 MONITORING ACTIONS

The following table details the monitoring actions identified for HRLP management activities during the construction phase. The aim of the monitoring actions is to verify whether the residual impacts are under control and the mitigation measures/action have been effective.

For each monitoring measure/action identified, the table shows:

- Item: the identification code of the monitoring activity (ID.);
- Monitoring Activity: description of the monitoring activity;
- Source document: is the reference to one or more applicable standard or limit value (i.e. National Regulation and Permits, EBRD Performance Requirements and related EU Regulations/Directives, IFC PS/Guidelines, or other GIIP);
- Timeline and frequency: frequency/timing of the monitoring activity;
- KPI (Key performance indicator): regulatory limit value or qualitative acceptance criteria to comply with;
- Responsibility: resource responsible for implementing the monitoring activity;
- WF/OHL: indication whether the measure/action is applicable to the Wind Farm (WF) and/or Overhead Line (OHL)

5.1 Construction

Table 7: Monitoring actions for construction phase

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
HRLP 11	<ul style="list-style-type: none"> Contract signed in the light of national laws and international standards 	EBRD PR 2 IFC PS 2 EHS Guidelines for Wind Energy § 1.2 GIIP	Quarterly	Number and % of local workforce	NOTUS will record and provide figures regarding employment of local workforce to SOWI	WF / OHL
HRLP 12	<ul style="list-style-type: none"> Number of workers engaged in line with both national legislation and applicable international (ILO) standards and recommendations Number of workers' organisations Periodical control on the work environment 	EBRD PR 2 IFC PS 2 EHS Guidelines for Wind Energy § 1.2 GIIP	Quarterly	Number and % of local workforce	NOTUS will record and provide figures regarding employment of local workforce to SOWI	WF / OHL
HRLP 13	<ul style="list-style-type: none"> Employment of female workforce Employment of local workforce 	EBRD PR 2 IFC PS 2 EHS Guidelines for Wind Energy § 1.2 GIIP	Quarterly	Number and % of female workforce	SOWI for collecting data	WF / OHL
HRLP 14	<ul style="list-style-type: none"> Capacity to respond and solve workers grievances within the established timeframe and with the satisfaction of the complainant 	EBRD PR 2 IFC PS 2 EHS Guidelines for Wind Energy § 1.2	Quarterly	Number % of grievances responded and solved within timeframe	NOTUS will record and provide figures regarding employment of woman workforce to SOWI	WF / OHL

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
		GIIP				
HRLP 15	<ul style="list-style-type: none"> Capacity of managing and resolving recurrent workers grievances of similar nature 	EBRD PR 2 IFC PS 2 EHS Guidelines for Wind Energy § 1.2 GIIP	As needed	Trend of grievances of similar nature over time,	SOWI for collecting data	WF / OHL

5.2 Operation

Table 8: Monitoring actions for operation phase

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
HRLP 16	<ul style="list-style-type: none"> Contract signed in the light of national laws and international standards 	EBRD PR 2 IFC PS 2 EHS Guidelines for Wind Energy § 1.2 GIIP	Quarterly	Number and % of local workforce	NOTUS will record and provide figures regarding employment of local workforce to SOWI	WF / OHL
HRLP 17	<ul style="list-style-type: none"> Number of workers engaged in line with both national legislation and applicable international (ILO) standards and recommendations Number of workers' organisations Periodical control on the work environment 	EBRD PR 2 IFC PS 2 EHS Guidelines for Wind Energy § 1.2 GIIP	Quarterly	Number and % of local workforce	NOTUS will record and provide figures regarding employment of local workforce to SOWI	WF / OHL

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF / OHL
HRLP 18	<ul style="list-style-type: none"> ■ Employment of female workforce ■ Employment of local workforce 	EBRD PR 2 IFC PS 2 EHS Guidelines for Wind Energy § 1.2 GIIP	Quarterly	Number and % of female workforce	SOWI for collecting data	WF / OHL
HRLP 19	<ul style="list-style-type: none"> ■ Capacity to respond and solve workers grievances within the established timeframe and with the satisfaction of the complainant 	EBRD PR 2 IFC PS 2 EHS Guidelines for Wind Energy § 1.2 GIIP	Quarterly	Number % of grievances responded and solved within timeframe	NOTUS will record and provide figures regarding employment of woman workforce to SOWI	WF / OHL
HRLP 20	<ul style="list-style-type: none"> ■ Capacity of managing and resolving recurrent workers grievances of similar nature 	EBRD PR 2 IFC PS 2 EHS Guidelines for Wind Energy § 1.2 GIIP	As needed	Trend of grievances of similar nature over time	SOWI for collecting data	WF / OHL

6.0 AUDIT AND REVIEW

The correct implementation of this Management Plan is verified through internal inspections and audits to be carried out according to the requirements included in section “Internal audit” of the “ESMS Manual” and in the “Audit and Non-Conformities Procedure”.

The schedule, the frequency, the scope and objectives of the audit as well as the responsible internal auditors are indicated in the Audit Program that is developed and updated by SOWI.

Internal auditing shall address:

- The correct implementation of this Management Plan
- The correct development and implementation of Contractor’s Plan
- The correct and timely implementation of an auditing and review system by the Contractor
- Each of the point indicated in the tables in section 4.0 (mitigation measures/actions) and 5.0 (monitoring activities) of this plan and in particular:
 - Employment of local workforce
 - Employment of female workforce
 - Capacity to respond and solve workers grievances within the established timeframe and with the satisfaction of the complainant
 - Capacity of managing and resolving recurrent workers grievances of similar naturethe establishment of a stakeholder engagement process related to the aspects addressed by this Management Plan.

Evidences and results of the inspection and audit activities are included in the audit reports and in the “Non-Conformity and Preventive/Corrective actions” records.

SOWI Management reviews results of inspections and audits and the progress of the Preventive/Corrective actions and takes additional appropriate actions if necessary, according to the indications included in section 7 “Management Review” of the ESMS Manual.

During steady state operations, this Management Plan will be reviewed on an annual basis and any necessary revisions made to reflect the changing circumstances, operational needs or monitoring results. Revision of this Management Plan will be the responsibility of the HSE Manager, who is in charge of this Plan.

7.0 REPORTING

This section provides instructions and requirements for the reporting related to mitigation measures/actions, to monitoring activities and to internal auditing.

7.1 Reporting of the monitoring activities

Evidences and results of the monitoring activities (detailed in section 5.0) have to be described in detail in appropriate monitoring reports. Reporting of the auditing activities

The correct implementation of this Management Plan is to be verified through internal audits to be carried out according to the requirements included in the “ESMS Manual”, the internal auditing procedure and section 6.0 “Audit and review” of this Management Plan.

Evidences of the implementation of the mitigation measures/actions (detailed in section 4.0), of the timely deployment of monitoring activities (detailed in section 5.0) and of related results are described in the audit reports. These audit reports must include the following minimum information/data:

- list of the items audited (detailed in sections 4.0 and 5.0);
- information whether the items have been implemented within the indicated timeline and frequency;
- achievement (or not) of the KPIs;
- description of non-compliances eventually identified.

7.2 Self-monitoring report

Monitoring data together with the results of the audit activities will be summarized in a Self-Monitoring Report on a quarterly basis that will be provided every quarter to the Lenders and eventually to stakeholders as further described in the “ESMS Manual”.



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Bajgora Wind Project

Natural Occurring Asbestos (NOA) Management Plan

Submitted to:

SOWI Kosovo

Submitted by:

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19122298/12274 Final

October 3rd, 2019



Acronyms

PP pollution Prevention

ESMS Environmental and Social Management System

EBRD European Bank for Reconstruction and Development

IFC International Finance Corporation

KPI Key Performance Indicators

PR Performance Requirement (issued by EBRD)

PS Performance Standard (issued by IFC)

HSE Health, Safety and Environment

ESIA Environmental and Social Impact Assessment

EPC Engineering Procurement and Construction

ERP Emergency Response Plan

EU European Union

ESHS Environmental, Social Health and Safety

ESMP(s) Environmental and Social Management Plan(s)

MP Management Plan

WF Wind Farm

OHL Overhead line

GIIP Good International Industry Practice

OHS Occupational Health and Safety

BAT Best Available Technology

ISO International Organization for Standardization

Client:	SOWI (Solar & Wind) Kosovo
Project:	Wind Farm Selac 1, 2 and 3 located near the village of Bajgora in the municipality of Mitrovica, in Northern Kosovo. It includes 20 km connection powerline.
Facilities:	The project consists of 27 WTGs type GE 3.8-137 with a capacity of 3.83 MW with a hub height of 110 m and total capacity of 103.41 MW. The energy will be connected to the existing grid through an 110kV overhead line (OHL), having approximately 20 km length. The power line is considered part of the Project during its construction and will be considered an associated facility for the operation phase.
EPC Contractor:	NOTUS
Site Management:	All key managerial roles involved in the Construction Site management and in the windfarm operation, mainly referring to the SOWI personnel.

Table of Contents

1.0	PURPOSE AND SCOPE	2
2.0	ROLES AND RESPONSIBILITIES.....	4
3.0	BACKGROUND POLICIES AND STANDARDS.....	6
3.1	National standards and regulation	6
3.2	International standards and regulation.....	6
3.3	Project limit values	7
4.0	MITIGATION MEASURES/ACTION	7
4.1	Construction	13
4.2	Operation.....	15
5.0	MONITORING ACTIONS.....	16
5.1	Construction	17
5.2	Operation.....	21
6.0	AUDIT AND REVIEW.....	22
7.0	REPORTING	22
7.1	Reporting of the monitoring activities	22
7.2	Reporting of the auditing activities	23
7.3	Self-monitoring report.....	23
TABLES		
	Figure 1: Flowchart showing criteria for the selection of different Operating Scenarios during the Construction phase	12

1.0 PURPOSE AND SCOPE

This Natural Occurring Asbestos (NOA) Management Plan (MP) identifies and presents the framework and the strategy for implementing SOWI Environmental and Social Management System (ESMS) in relation to Natural Occurring Asbestos aspects.

It has been developed in accordance with SOWI policies, with the commitments undertaken in the ESIA, with Kosovo and international regulatory framework, with EBRD Environmental and Social Policy and Performance Requirements PR3, IFC Performance Standards PS 3 and IFC General and Sector Specific EHS Guidelines.

This NOA MP applies to both **construction phase** and **operation phase** of the Project. It provides also guidelines to the contractor in charge for the Engineering Procurement and Construction (EPC) activities of the Project for addressing Environmental and Social aspects according to the standards mentioned above.

Additional details related to the operation phase of the Project are expected to come in due course; it is therefore recommended that this plan is subject to a systematic review process before start of operations in order to encompass and consider any information relevant to the NOA matters.

Natural Occurring Asbestos management in this plan is intended as management of potential risks for human health and the environment related to the handling of rock, soil and top-soil containing natural asbestos during the following activities:

- surface levelling and grading;
- blasting;
- temporary stockpiling of material;
- construction of storage and permanent deposit areas;
- construction of wind turbine foundations;
- presence of deposit areas.

The Purpose of this MP is to define:

- a rationale for managing NOA during the construction phase and the operation phase;
- the scope and applicable interphases for the management of addressing NOA management and monitoring activities during both phases;
- responsibilities, commitments, operating procedures and instructions for the implementation of this MP;
- the mitigation measures applicable to the Project in relation to NOA aspects; and
- manage the monitoring activities performance in relation to NOA aspects.

This MP applies to normal operating conditions during the construction and operation activities and does not specifically address any emergency situation. Emergencies are addressed in a specific Emergency Response Plan (ERP).

The overall objective of this MP is to identify the mitigation and monitoring measures in order to:

- adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimize and restore impacts to the environment;
- develop and implement policies, plans and procedures to integrate environmental and social aspects within the overall project management framework throughout its lifecycle;

- establish a monitor program to assess the effects of residual impacts on the environment;
- report the results of the periodic audits and provide for corrective actions, if necessary, in order to reach the planned objectives.

2.0 ROLES AND RESPONSIBILITIES

Principal roles and responsibilities for the implementation of this plan are in Table 1 outlined below.

Table 1: Roles and responsibilities

Role	Overall responsibilities	Specific responsibilities
Management	<ul style="list-style-type: none"> ■ Management will ensure sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of actions, measures and monitoring activities under SOWI's responsibility. ■ This will include the selection of specialized contractor(s) for specific tasks to be carried out as part of the implementation of this Management Plan such as (but not limited to) PP management surveys, monitoring activities and data analysis and reporting; ■ designating specific personnel on site or at the administrative level, clearly define their roles and responsibilities within the environmental and social management system; 	<ul style="list-style-type: none"> ■ Final approval of this Management Plan and subcontractors' plans/procedures for the Project; ■ Taking appropriate actions to address major Non-Conformities based on audit reports, performance monitoring reports and on SOWI HSE Manager proposed approach
HSE Manager	<ul style="list-style-type: none"> ■ Ensuring that this Plan is up to date and appropriate to the nature and scale of the Project and ensuring that this Management Plan is implemented effectively; ■ Programming inspections and audit activities to ensure the correct implementation of this Management Plan; and of specialized contractor(s) tasks ■ Collecting, organizing and reviewing monitoring data and performance monitoring reports provided by the specialized contractor(s) and providing summary results of such reports to Management, to stakeholders and to the Lenders 	<ul style="list-style-type: none"> ■ Ensuring that action/measures and monitoring activities directly under SOWI responsibilities are carried out timely and adequately according to this Management Plan requirements; ■ addressing Non-Conformities through the definition of Preventive/Corrective actions proposing to Management, if necessary, amendments and/or updates to this Management Plan and issuing plan revisions; ■ bringing major Non-Conformities immediately to the attention of Management;

Role	Overall responsibilities	Specific responsibilities
EPC contractor and subcontractors	<ul style="list-style-type: none"> ■ will ensure sufficient and qualified resources are allocated ■ effective execution of the specific tasks assigned in conformity with this Management Plan and with contractual arrangements; ■ respect of EHS requirements included in the ESMS; ■ agree with the timing and logistics of the monitoring activities 	<ul style="list-style-type: none"> ■ provide relevant monitoring data and monitoring reports to as indicated in this plan; ■ may propose changes and integrations to the monitoring activities included in the Management Plan; the proposed changes shall be evaluated and approved by HSE Manager and by Management.
All employees and contractors	<ul style="list-style-type: none"> ■ Comply with environmental management requirements. ■ Report any activities which are causing unnecessary biodiversity issues. 	<ul style="list-style-type: none"> ■ Give evidence that the relevant mitigation measures identified in the current PP management plan are being properly considered, implemented and monitored during execution of the works.

3.0 BACKGROUND POLICIES AND STANDARDS

This section includes all those policies, standards and requirements of reference for this Management Plan that are applicable to the Project during the construction phase.

This section includes references

- to applicable national laws and regulations, including those laws implementing host country obligations under international law and treaties;
- to the applicable international laws and standards.

3.1 National standards and regulation

Table 2: National standards and regulation

National standards and regulation
Regulation MLSW No. 07/2017 On the Protection of Employees from Risks Related to Exposure to Asbestos at Work (Kosovo)
Decree of the President No. 120/2017 On the management of excavated rocks and soil (including those containing natural occurring asbestos) (Italy)
Ministerial Decree of 06/09/1994 On the methods for determining asbestos concentrations (Italy)
Legislative Decree No.81/2008 Implementation of Article 1 of Law no. 123, concerning the protection of health and safety in the workplace (Italy)
Control of Asbestos Regulations (CAR-2012) (United Kingdom)

3.2 International standards and regulation

Table 3: International standards and regulation

International standards and regulation
Directive 2009/148/EC of the European Parliament and of the Council of 30 November 2009 on the protection of workers from the risks related to exposure to asbestos at work (EU)
Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives (EU)
Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC and amending Regulation (EC) No 1907/2006 (EU)
IFC PS3: Resource Efficiency and Pollution Prevention
EBRD Performance Requirements 3 - Resource Efficiency and Pollution Prevention and Control

International standards and regulation
IFC Industry Sector Guidelines: EHS Guidelines for Wind Energy § 1.1.2 §1.1.5
World Health Organization: Air Quality Guidelines for Europe (Second Edition)

3.3 Project limit values

No quantitative limit values for asbestos in air and solid matrices (soil, rock) are provided by Kosovo regulation; threshold values defined by standards and regulation reported in **Table 2** were used as reference. **Table 4** reports threshold values adopted for asbestos concentration in solid matrices and air.

Table 4 Project standards

Matrix	M.U.	Project Standard	Reference
Solid matrix (rock, soil, top-soil)	mg/kg	1000	Directive 2008/98/EC (EU)
Air (inside working area)	f/l (fibres per liter)	100	Legislative Decree No.81/2008
Air (outside working area)	f/l (fibres per liter)	1	WHO Air Quality Guidelines for Europe (Second Edition)

4.0 MITIGATION MEASURES/ACTION

Based on the ESIA the potential impact factor related to NOA is related to the emission of dust and particulate matter. The following measures are applicable only to the Wind Farm (WF), because no asbestos bearing geological formations are located in the Overhead Line (OHL) area.

The following tables details the management and mitigation measures/actions identified for NOA MP management activities during construction and operation phases. For each measure/action identified, the table shows:

- Item: the identification code of the mitigation measure/actions (ID.);
- Measure/Actions: description of the mitigation measure/ actions;
- Source document: is the reference to one or more applicable standard (i.e. National Regulation and Permits, EBRD Performance Requirements and related EU Regulations/Directives, IFC PS/Guidelines, or other GIIP);
- Timeline and frequency: frequency/timing of the measure/action;
- KPI (Key performance indicator): quantitative compliance indicator or qualitative acceptance criteria that can be used to verify the actual effectiveness of the mitigation measure/actions;
- Responsibility: resource responsible for implementing the measures/actions;

The aim of the “mitigation hierarchy” (avoidance, minimization, rehabilitation/restoration, offset) is applied for the selection of the measures to limit as far as possible negative impacts to the environment.

This process is intended as an adaptive management system of the project, so that the mitigation and management approach will be adapted based on any new findings which could arise from the monitoring program described in the following section.

Management of NOA related risk for the environment and human health in workplaces is an iterative process that must be based on results from preliminary investigations and air monitoring carried out during works. Minimization measures reported in **Table 5** and **Table 6** have been presented as Operating Scenarios ("OS") that comprise a combination of: working procedures, H&S measures and monitoring measures.

The selection of the appropriate OS during the construction phase shall be based on:

- Preliminary investigations: an Investigation Plan shall be produced in order to perform preliminary investigations in correspondence to wind turbines, access roads and deposit areas locations before construction. The aim of this investigations is to define:
 - determine concentration of natural occurring asbestos in rock, soil and top-soil (solid matrices);
 - measure background concentration of asbestos fibres in the air.
- Air monitoring performed inside and outside working areas during construction activities.

Measures included in the above-mentioned OS may need to be revised during work activities base on air monitoring data.

Here follows a description of the Operating Scenarios and the flowchart showing criteria for the selection of different OS during construction phase (**Figure 1**).

OPERATING SCENARIO No.1 (OS01):

The operating scenario No. 1 entails:

- All excavation can be carried out with standard techniques;
- In case of blasting, fog cannon should be used to reduce dust production and airborne fibers dispersion;
- Trucks transporting material shall be covered during transportation;
- Temporary stockpiling of the material is allowed without covering;
- Stockpiling of materials with different concentration of natural occurring asbestos shall be avoided;
- Machine decontamination is not required;
- Specific PPE against the risk of exposure to airborne asbestos fibers are not required to be worn.
- Airborne fibers monitoring shall be carried out both inside and outside the working area only during working time, with fixed monitoring station located upwind and downwind (two locations). Monitoring stations outside the working area shall be installed in the surrounding of the temporary stockpiled material (if present). Monitoring inside the working area shall be carried out by both PCOM¹ and SEM² methodologies, while monitoring outside the working area shall be carried out by SEM methodology.

OPERATING SCENARIO No.2 (OS02):

¹ PCOM: Phase Contrast Optical Microscope

² SEM: Scanning Electron Microscope

The operating scenario No. 2 entails:

- Limitation of the access to sites only to workers strictly needed and authorized. Access to be recorded in a daily updated register;
- Training of workers on specific procedures to be adopted in the excavation, transportation and handling of the material as well as for construction;
- Implementation of preventive and periodic health surveillance programs for exposed workers;
- To prevent asbestos fibers containing dust from spreading through work clothes outside the sites, each person involved in excavation activities (except for staff exclusively in the offices) must, before entering their workstations, wear coverall and PPE that will be placed at the end of the shift (and at lunch break) in a special black/white room; the black/white changing room shall be equipped with showers, heaters, waste water filtering of asbestos fibers (absolute filtering); filtered waste water shall be collected and analyzed before discharge in the public sewer or disposed of (in case no public sewer is available); dirty clothes shall not be washed at home but in suitably equipped laundries;
- To ensure that workers are not exposed to a concentration of asbestos in the air above the limit value of 100 f/l, the main work phases (excavation and loading phase, use of explosives and perforations) must be carried out inside the cabins of the machine (suitably closed and air-conditioned); the remaining tasks to be performed outside, in the proximity of the active excavation fronts, must always take place with the use of individual protection devices (PPE) suitable to prevent the risk of exposure to airborne asbestos fibers (suitable PPE shall abate the asbestos concentration breathable by worker lower than 10 f/l); these PPE shall be worn by all the workers which might be exposed to that risk (including machine drivers if cabins are not closed nor air-conditioned);
- Systematic spraying of excavation fronts and construction site tracks, or the installation of suitable dust coverings and layers;
- In case of blasting, wetting should also be provided for the nearest surfaces affected by explosions (above and below ground steps) both before and immediately after the explosion; sufficient time for dust deposition (at least 1 hour) will have to be allowed before further processing of the blasted material;
- Provision of an equipped area for washing the wheels (and other dirty parts if necessary) of vehicles leaving the working area;
- Trucks transporting material shall be covered during transportation; speed limit within the working area and along construction site tracks shall be limited to 10 km/h;
- Temporary stockpiles of the material should be kept covered, other measures to prevent dust pollution are allowed; stockpiling of materials with different natural occurring asbestos shall be avoided;
- Airborne fibers monitoring shall be carried out both inside and outside the working area only during working time, with fixed monitoring station located upwind and downwind (two locations). Monitoring stations outside the working area shall be installed in the surrounding of the temporary stockpiled material (if present). Monitoring inside the working area shall be carried out by both Phase Contrast Optical Microscope (PCOM) and Scanning Electron Microscope (SEM) methodologies, while monitoring outside the working area shall be carried out by SEM methodology.

REVISING OPERATING SCENARIO No.2:

- Improving PPE for prevention of exposure to airborne asbestos fibers (use of masks with higher abatement capacity, provide specific procedures for donning and doffing, which require to shower before removing mask), at least for the period needed to be back to airborne fibers concentration below the limit;
- Improving dust abatement measures both in the construction site (for instance, continuous spraying of excavation front and construction site tracks) and/or in the stockpiling site (for instance, improve covering of stockpiled material); revise and improve dust coverings along construction site tracks;
- Reduce speed limit down to 5 km/h;
- Improving airborne fibers monitoring inside the working area: fixed monitoring stations upward and downward wind direction (two locations), carried out by SEM methodology and one personal airborne fiber detector, carried out by PCOM methodology.

OPERATING SCENARIO No.3 (OS03) (additional measures to be adopted together with Operating scenarios No.1 or Operating scenarios No.2, when required):

- Installation of a fixed station with an anemometer equipped with an acoustic and luminous signal that activates when an air speed > 6 m/sec is exceeded, indicating the obligation of immediate suspension of work;
- In case Operating scenario 2 is not already applied, tasks to be performed outside must always take place with the use of individual filtering mask (Filtering Face Piece with level of protection 3 - FFP3); the same individual protection devices must be worn even by machine drivers, if cabins are not closed nor air-conditioned;
- provision of clear posters at the entrance of the construction site and along the road (500 m away from the construction site, at least) explaining the risk of exposure to asbestos for population and indicative of the protective measures to be adopted;
- In case Operating scenario 2 is not already applied, speed within the working area and along construction site tracks shall be limited to 10 km/h;
- Improving dust abatement measures both in the construction site (improve spraying of excavation front; improve dust covering of construction site tracks) and/or in the stockpiling site (improve covering of stockpiled material), as necessary.

REVISING OPERATING SCENARIO No.3:

- Immediate suspension of work when the anemometer measures a wind speed > 4 m/sec;
- Reduce speed limit down to 5 km/h;
- Blasting should be avoided;
- Improving dust abatement measures both in the construction site (increase spraying station of excavation front; implement spraying along the construction site tracks) and/or in the stockpiling site (implement spraying of stockpiled material), as necessary.
- Improving airborne fibres monitoring outside the working area with fixed monitoring stations upwind and downwind the working area. One location upwind and two locations downwind, located at 100-200 m and 500 m distance from the working area. Measurement shall be carried out all day long (three measures per

day at each monitoring location). Monitoring stations shall be installed in the surrounding of the stockpiled material, if present. Monitoring shall be carried out by SEM methodology.

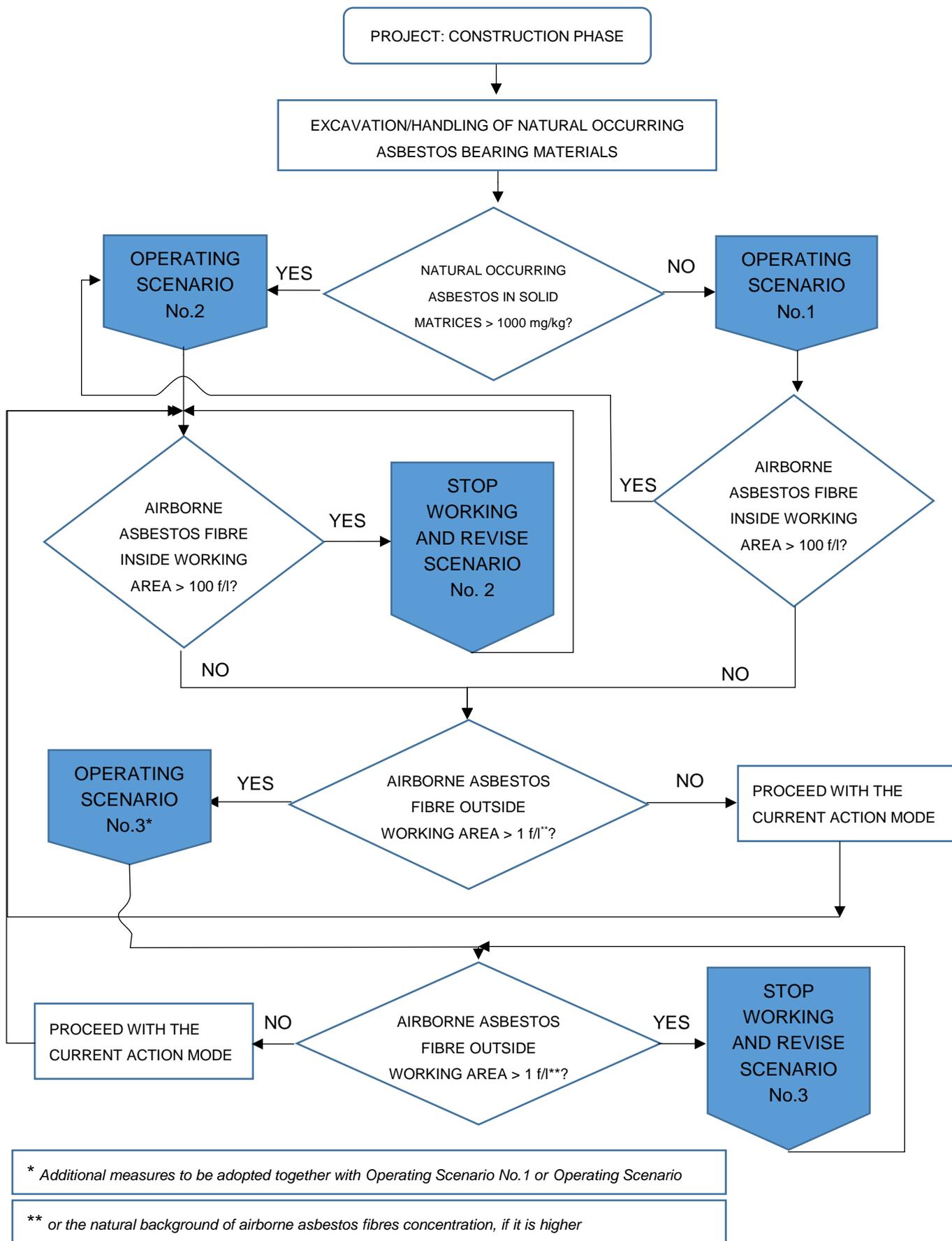


Figure 1: Flowchart showing criteria for the selection of different Operating Scenarios during the Construction phase

4.1 Construction

Table 5: Mitigation measures/actions for construction phase

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities
NOA01	<p>Avoidance:</p> <ul style="list-style-type: none"> ■ avoid of off-road vehicular traffic to prevent dust production and accelerated erosion phenomena that may increase exposure and wind erodibility of asbestos bearing materials; ■ avoid uncontrolled stockpiling of asbestos bearing excavated material; ■ avoid construction of permanent deposits of asbestos bearing material outside the area characterized by natural occurring asbestos. 	EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP	During construction phase	Environmental report	NOTUS to record and provide data to SOWI SOWI for collecting data
NOA02	<p>Minimization:</p> <ul style="list-style-type: none"> ■ Adoption of Operating Scenario No. 1 	Decree of the President No. 120/2017, Legislative Decree No.81/2008, Ministerial Decree of 06/09/1994, Air Quality Guidelines for Europe (Second Edition), Control of Asbestos Regulations (CAR-2012)	During construction phase	Environmental report	NOTUS to record and provide data to SOWI SOWI for collecting data
NOA03	<p>Minimization:</p> <ul style="list-style-type: none"> ■ Adoption of Operating Scenario No. 2 	Decree of the President No. 120/2017, Legislative Decree No.81/2008, Ministerial Decree	During construction phase	Environmental report	NOTUS to record and provide data to SOWI

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities
		of 06/09/1994, Air Quality Guidelines for Europe (Second Edition), Control of Asbestos Regulations (CAR-2012)			SOWI for collecting data
NOA04	<p><u>Minimization:</u></p> <ul style="list-style-type: none"> ■ Adoption of Operating Scenario No. 3 	Decree of the President No. 120/2017, Legislative Decree No.81/2008, Ministerial Decree of 06/09/1994, Air Quality Guidelines for Europe (Second Edition), Control of Asbestos Regulations (CAR-2012)	During construction phase	Environmental report	NOTUS to record and provide data to SOWI SOWI for collecting data

4.2 Operation

Table 6: Mitigation measures/actions for operation phase

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities
NOA05	<p>Avoidance:</p> <ul style="list-style-type: none"> ■ avoid of off-road vehicular traffic to prevent dust production and accelerated erosion phenomena that may increase exposure and wind erodibility of asbestos bearing materials; 	<p>EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP</p>	<p>During construction phase</p>	<p>Environmental report</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>

5.0 MONITORING ACTIONS

The following table details the monitoring actions identified for NOA management activities during the construction and operation phase. The aim of the monitoring actions is to verify whether the residual impacts are under control and the mitigation measures/action have been effective.

Monitoring actions reported in **Table 7** with a “OS” item code are those included in the Operating Scenarios described in section 4.0.

For each monitoring measure/action identified, the table shows:

- Item: the identification code of the monitoring activity (ID.);
- Monitoring Activity: description of the monitoring activity;
- Source document: is the reference to one or more applicable standard or limit value (i.e. National Regulation and Permits, EBRD Performance Requirements and related EU Regulations/Directives, IFC PS/Guidelines, or other GIIP);
- Timeline and frequency: frequency/timing of the monitoring activity;
- KPI (Key performance indicator): regulatory limit value or qualitative acceptance criteria to comply with;
- Responsibility: resource responsible for implementing the monitoring activity.

5.1 Construction

Table 7: Monitoring actions for construction phase

Item	Monitoring actions	Source document	Timeline and frequency	KPI	Responsibilities
OS1	<ul style="list-style-type: none"> <li data-bbox="436 496 947 788">■ airborne fibers monitoring carried out inside the working area only during working time, with fixed monitoring stations located upwind and downwind (two locations). Monitoring inside the working area shall be carried out by both PCOM³ and SEM⁴ methodologies <li data-bbox="436 820 947 1182">■ airborne fibers monitoring carried out outside the working area only during working time, with fixed monitoring stations located upwind and downwind, in the surrounding of the temporary stockpiled material (if present) or the working area. Monitoring outside the working area shall be carried out by SEM methodology. 	<p>Decree of the President No. 120/2017, Legislative Decree No.81/2008, Ministerial Decree of 06/09/1994, Air Quality Guidelines for Europe (Second Edition), Control of Asbestos Regulations (CAR-2012)</p>	<p>During construction phase (only during working time)</p>	<p>Environmental report</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>

³ PCOM: Phase Contrast Optical Microscope

⁴ SEM: Scanning Electron Microscope

Item	Monitoring actions	Source document	Timeline and frequency	KPI	Responsibilities
OS2	<ul style="list-style-type: none"> <li data-bbox="439 405 947 699">■ airborne fibers monitoring carried out inside the working area only during working time, with fixed monitoring stations located upwind and downwind (two locations). Monitoring inside the working area shall be carried out by both PCOM⁵ and SEM⁶ methodologies <li data-bbox="439 724 947 1054">■ airborne fibers monitoring carried out outside the working area only during working time, with fixed monitoring stations located upwind and downwind, in the surrounding of the temporary stockpiled material or working area. Monitoring outside the working area shall be carried out by SEM methodology. 	<p>Decree of the President No. 120/2017, Legislative Decree No.81/2008, Ministerial Decree of 06/09/1994, Air Quality Guidelines for Europe (Second Edition), Control of Asbestos Regulations (CAR-2012)</p>	<p>During construction phase (only during working time)</p>	<p>Environmental report</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>

⁵ PCOM: Phase Contrast Optical Microscope

⁶ SEM: Scanning Electron Microscope

Item	Monitoring actions	Source document	Timeline and frequency	KPI	Responsibilities
OS2R	<ul style="list-style-type: none"> ■ If airborne asbestos fibers concentration <u>inside the working area</u> exceeds project limit: <ul style="list-style-type: none"> ■ Improvement of airborne fibers monitoring inside the working area with fixed monitoring stations upward and downward wind direction (two locations), carried out by SEM methodology and one personal airborne fiber detector, carried out by PCOM methodology. 	Decree of the President No. 120/2017, Legislative Decree No.81/2008, Ministerial Decree of 06/09/1994, Air Quality Guidelines for Europe (Second Edition), Control of Asbestos Regulations (CAR-2012)	During construction phase (only during working time)	Environmental report	NOTUS to record and provide data to SOWI SOWI for collecting data
OS3	<ul style="list-style-type: none"> ■ Wind speed monitoring with a fixed anemometer equipped with an acoustic and luminous signal that activates when an air speed > 6 m/sec is exceeded, indicating the obligation of immediate suspension of work. 	Decree of the President No. 120/2017, Legislative Decree No.81/2008, Ministerial Decree of 06/09/1994, Air Quality Guidelines for Europe (Second Edition), Control of Asbestos Regulations (CAR-2012)	During construction phase (only during working time)	Environmental report	NOTUS to record and provide data to SOWI SOWI for collecting data

Item	Monitoring actions	Source document	Timeline and frequency	KPI	Responsibilities
OS3R	<ul style="list-style-type: none"> ■ If airborne asbestos fibers concentration <u>outside the working area</u> exceeds project limit: <ul style="list-style-type: none"> ■ Improvement of airborne fibers monitoring outside the working area. One location upwind and two locations downwind, located at 100-200 m and 500 m distance from the working area. Measurement shall be carried out all day long (three measures per day at each monitoring location). Monitoring stations shall be installed in the surrounding of the stockpiled material, if present. Monitoring shall be carried out by SEM methodology. 	Decree of the President No. 120/2017, Legislative Decree No.81/2008, Ministerial Decree of 06/09/1994, Air Quality Guidelines for Europe (Second Edition), Control of Asbestos Regulations (CAR-2012)	During construction phase (over 24 hours period)	Environmental report	NOTUS to record and provide data to SOWI SOWI for collecting data
NOA06	<ul style="list-style-type: none"> ■ periodic visual inspection and maintenance of permanent deposit areas and associated stormwater drainage network during construction activities. The aim of the inspection is to identify possible instability and accelerated erosion phenomena 	EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP	Weekly	Record of visual inspection of deposit areas	NOTUS to record and provide data to SOWI SOWI for collecting data

Item	Monitoring actions	Source document	Timeline and frequency	KPI	Responsibilities
	affecting the temporary/final cover and the body of the deposits.				

5.2 Operation

Table 8: Monitoring actions for operation phase

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities
NOA07	<ul style="list-style-type: none"> periodic visual inspection and maintenance of permanent deposit areas and associated stormwater drainage network. The aim of the inspection is to verify the integrity of the capping and the containment of asbestos bearing material. 	EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP	Quarterly	Record of visual inspection of deposit areas	NOTUS to record and provide data to SOWI SOWI for collecting data
NOA08	<ul style="list-style-type: none"> verification of avoidance of off-road vehicular traffic in charge of maintenance activities (to prevent dust production and accelerated erosion phenomena that may increase exposure and wind erodibility of asbestos bearing materials) 	EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP	During operation phase	Record of notices and reports of complaints	NOTUS to record and provide data to SOWI SOWI for collecting data

6.0 AUDIT AND REVIEW

The correct implementation of this Management Plan is verified through internal inspections and audits to be carried out according to the requirements included in section “Internal audit” of the “ESMS Manual” and in the “Audit and Non-Conformities Procedure”.

The schedule, the frequency, the scope and objectives of the audit as well as the responsible internal auditors are indicated in the Audit Program that is developed and updated by SOWI.

Internal auditing shall address:

- The correct implementation of this Management Plan
- The correct development and implementation of Contractor’s Plan
- The correct and timely implementation of an auditing and review system by the Contractor
- Each of the point indicated in the tables in section 4.0 (mitigation measures/actions) and 5.0 (monitoring activities):
- the establishment of a stakeholder engagement process related to the aspects addressed by this Management Plan.

Evidences and results of the inspection and audit activities are included in the audit reports and in the “Non-Conformity and Preventive/Corrective actions” records.

SOWI Management reviews results of inspections and audits and the progress of the Preventive/Corrective actions and takes additional appropriate actions if necessary, according to the indications included in section 7 “Management Review” of the ESMS Manual.

During steady state operations, this Management Plan will be reviewed on an annual basis and any necessary revisions made to reflect the changing circumstances, operational needs or monitoring results. Revision of this Management Plan will be the responsibility of the HSE Manager, who is in charge of this Plan.

7.0 REPORTING

This section provides instructions and requirements for the reporting related to mitigation measures/actions, to monitoring activities and to internal auditing.

7.1 Reporting of the monitoring activities

Evidences and results of the monitoring activities (detailed in section 5.0) have to be described in detail in appropriate monitoring reports. These monitoring reports must include the following minimum information/data (where relevant):

- analytical certificates from the laboratory/ies;
- localization of the monitoring activities (geographical coordinates in WGS84 system and elevation);
- timing of the data collection (start date and end date);
- description of the applied methodology;
- KPI (Key performance indicator): regulatory limit value or qualitative acceptance criteria to comply with;
- the responsibility for implementing the specific monitoring activities (including reference to this Management Plan and reference to the appointment of third parties eventually contracted to perform part of the activity (e.g. external laboratories and consultants);

- conclusions on compliance vs. KPI and eventual observations;
- quality control procedures applied to ensure consistency and reliability of the analyses or results.

7.2 Reporting of the auditing activities

The correct implementation of this Management Plan is to be verified through internal audits to be carried out according to the requirements included in the “ESMS Manual”, the internal auditing procedure and section 6.0 “Audit and review” of this Management Plan.

Evidences of the implementation of the mitigation measures/actions (detailed in section 4.0), of the timely deployment of monitoring activities (detailed in section 5.0) and of related results are described in the audit reports. These audit reports must include the following minimum information/data:

- list of the items audited (detailed in sections 4.0 and 5.0);
- information whether the items have been implemented within the indicated timeline and frequency;
- achievement (or not) of the KPIs;
- description of non-compliances eventually identified.

7.3 Self-monitoring report

Monitoring data together with the results of the audit activities will be summarized in a Self-Monitoring Report on a quarterly basis that will be provided every quarter to the Lenders and eventually to stakeholders as further described in the “ESMS Manual”.



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Bajgora Wind Project

Occupational Health&Safety Management Plan (OHS MP)

Submitted to:

SOWI Kosovo

Submitted by:

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19122298/12273 Final

October 3rd, 2019



Acronyms

OHS Occupational Health & Safety

ESMS Environmental and Social Management System

EBRD European Bank for Reconstruction and Development

IFC International Finance Corporation

KPI Key Performance Indicators

PR Performance Requirement (issued by EBRD)

PS Performance Standard (issued by IFC)

HSE Health, Safety and Environment

ESIA Environmental and Social Impact Assessment

EPC Engineering Procurement and Construction

ERP Emergency Response Plan

EU European Union

ESHS Environmental, Social Health and Safety

ESMP(s) Environmental and Social Management Plan(s)

MP Management Plans

WF Wind Farm

OHL Overhead line

GIIP Good International Industry Practice

OHS Occupational Health and Safety

BAT Best Available Technology

ISO International Organization for Standardization

Client:	SOWI (Solar & Wind) Kosovo
Project:	Wind Farm Selac 1, 2 and 3 located near the village of Bajgora in the municipality of Mitrovica, in Northern Kosovo. It includes 20 km connection powerline.
Facilities:	The project consists of 27 WTGs type GE 3.8-137 with a capacity of 3.83 MW with a hub height of 110 m and total capacity of 103.41 MW. The energy will be connected to the existing grid through an 110kV overhead line (OHL), having approximately 20 km length. The power line is considered part of the Project during its construction and will be considered an associated facility for the operation phase.
EPC Contractor:	NOTUS
Site Management:	All key managerial roles involved in the Construction Site management and in the windfarm operation, mainly referring to the SOWI personnel.

Table of Contents

- 1.0 PURPOSE AND SCOPE2**
- 2.0 ROLES AND RESPONSIBILITIES.....3**
- 3.0 BACKGROUND POLICIES AND STANDARDS.....6**
 - 3.1 National standards and regulation6
 - 3.2 International standards.....6
 - 3.3 Project limit values7
- 4.0 MITIGATION MEASURES/ACTION7**
 - 4.1 Occupational health & safety aspects8
 - 4.2 Construction12
 - 4.3 Operation.....14
- 5.0 MONITORING ACTIONS17**
 - 5.1 Construction18
 - 5.2 Operation.....19
- 6.0 AUDIT AND REVIEW.....23**
- 7.0 REPORTING24**
 - 7.1 Reporting of the monitoring activities24
 - 7.2 Reporting of the auditing activities24
 - 7.3 Self-monitoring report.....25

TABLES

- Table 1: Roles and responsibilities3
- Table 2: National standards and regulations6
- Table 3: International standards6
- Table 4: Mitigation measures/actions for construction phase12
- Table 5: Mitigation measures/actions for operation phase14
- Table 6: Monitoring actions18
- Table 7: Monitoring action for operation phase19

1.0 PURPOSE AND SCOPE

This Occupational Health and Safety (OHS) Management Plan (MP) identifies and presents the strategy for implementing SOWI Environmental and Social Management System (ESMS) in relation to Occupational Health and Safety.

It has been developed in accordance with SOWI policies, with the commitments undertaken in the ESIA, with Kosovo regulatory framework, with EBRD Environmental and Social Policy and Performance Requirements PR4 and PR2, IFC Performance Standards PS2 and IFC General and Sector Specific EHS Guidelines.

This OHS MP applies to both **construction phase** and **operation phase** of the Project. It provides guidelines to the contractor in charge for the Engineering Procurement and Construction (EPC) activities of the Project for addressing Environmental and Social aspects according to the standards mentioned above.

Additional details related to the operation phase of the Project are expected to come in due course; it is therefore recommended that this plan is subject to a systematic review process before start of operations in order to encompass and consider any information relevant to the OHS matters.

The Purpose of this Plan is to define:

- Project standards for OHS during the construction phase;
- the scope and applicable interphases for the management of addressing OHS management and monitoring activities during the construction phase;
- responsibilities, commitments, operating procedures and instructions for the implementation of this MP;
- the mitigation measures applicable to the Project in relation to OHS aspects;
- and manage the monitoring activities performance in relation to OHS aspects.

This MP applies to normal operating conditions during the construction and operation activities and does not specifically address any emergency situation. Emergencies are addressed in a specific Emergency Response Plan (ERP).

The overall objective of this MP is to identify the mitigation and monitoring measures in order to:

- adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimize and restore impacts to the environment;
- develop and implement policies, plans and procedures to integrate environmental and social aspects within the overall project management framework throughout its lifecycle;
- establish a monitor program to assess the effects of residual impacts on the environment;
- report the results of the periodic audits and provide for corrective actions, if necessary, in order to reach the planned objectives.

2.0 ROLES AND RESPONSIBILITIES

Principal roles and responsibilities for the implementation of this plan are in Table 1 outlined below.

Table 1: Roles and responsibilities

Role	Overall responsibilities	Specific responsibilities
Management	<ul style="list-style-type: none"> ■ Management will ensure sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of actions, measures and monitoring activities under SOWI's responsibility. ■ This will include the selection of specialized contractor(s) for specific tasks to be carried out as part of the implementation of this Management Plan such as (but not limited to) OHS management surveys, monitoring activities and data analysis and reporting; ■ designating specific personnel on site or at the administrative level, clearly define their roles and responsibilities within the environmental and social management system; 	<ul style="list-style-type: none"> ■ Final approval of this Management Plan and subcontractors' plans/procedures for the Project; ■ Taking appropriate actions to address major Non-Conformities based on audit reports, performance monitoring reports and on SOWI HSE Manager proposed approach
HSE Manager	<ul style="list-style-type: none"> ■ Ensuring that this Plan is up to date and appropriate to the nature and scale of the Project and ensuring that this Management Plan is implemented effectively; ■ Programming inspections and audit activities to ensure the correct implementation of this Management Plan; and of specialized contractor(s) tasks ■ Collecting, organizing and reviewing monitoring data and performance monitoring reports provided by the specialized contractor(s) and providing summary results of such reports to Management, to stakeholders and to the Lenders 	<ul style="list-style-type: none"> ■ Ensuring that action/measures and monitoring activities directly under SOWI responsibilities are carried out timely and adequately according to this Management Plan requirements; ■ addressing Non-Conformities through the definition of Preventive/Corrective actions proposing to Management, if necessary, amendments and/or updates to this Management Plan and issuing plan revisions; ■ bringing major Non-Conformities immediately to the attention of Management;

Role	Overall responsibilities	Specific responsibilities
EPC contractor and subcontractors	<ul style="list-style-type: none"> ■ effective execution of the specific tasks assigned in conformity with this Management Plan and with contractual arrangements; ■ respect of EHS requirements included in the ESMS; ■ agree with the timing and logistics of the monitoring activities 	<ul style="list-style-type: none"> ■ provide relevant monitoring data and monitoring reports to as indicated in this plan; ■ may propose changes and integrations to the monitoring activities included in the Management Plan; the proposed changes shall be evaluated and approved by HSE Manager and by Management.
Safety Engineer	<ul style="list-style-type: none"> ■ Acts as a team member of all Incident Investigation committees; ■ Coordinates the training program for the Site safety inspectors; ■ Develops, assist and conduct on-Site OHS training for all levels of personnel; ■ Conducts OHS inspections of all worksites and storage areas associated with field activities; ■ Collates all Key Performance Indicator data and transmit on regular basis; ■ Attends toolbox talks on a regular basis; ■ Participates in regular Site meetings ■ Contributes, as member, to the HS Committee, Risk Assessment Team for what concerns Safety issues related to the Project. 	<ul style="list-style-type: none"> ■ Acts as ESHS Representative: <ul style="list-style-type: none"> ■ Monitoring and reporting on execution of the SOWI Safety Management System at the Project/Site level; ■ Coordinating Safety orientations and training; ■ Participate on regular basis in Site Audits/Inspections in conjunction with Inspectors; ■ Participating in any investigation relating to Safety issues; ■ Verifying that the Emergency Preparedness and Response System is in place within the Project; ■ Managing and maintaining the Safety-related records and documentation; ■ Verifying that material safety data sheets (MSDSs) are maintained; ■ Through regular fieldwork, verifying that all personnel are fully conversant with the corporate and/or Project Safety Management System, its procedures, and related Safety instructions;

Role	Overall responsibilities	Specific responsibilities
		<ul style="list-style-type: none"> ▪ Distributing materials on Safety education, promotion, and awareness; ▪ Maintaining and updating ESHS Notice Board(s) for what concerns Safety issues
Safety Inspectors	<ul style="list-style-type: none"> ■ actively perform the OHS scheduled Site inspections and report the related findings to the Safety Engineer. 	
Firefighting team	<ul style="list-style-type: none"> ■ Takes the necessary actions during the fire emergency situations ■ Contributes to the Risk Assessment team for what concerns Firefighting issues related to the Project 	
All employees and contractors	<ul style="list-style-type: none"> ■ Comply with environmental management requirements. ■ Report any activities which are causing unnecessary biodiversity issues. 	<ul style="list-style-type: none"> ▪ Give evidence that the relevant mitigation measures identified in the current XXX management plan are being properly considered, implemented and monitored during execution of the works.

3.0 BACKGROUND POLICIES AND STANDARDS

This section includes all those policies, standards and requirements of reference for this Management Plan that are applicable to the Project during the construction phase.

This section includes references

- to applicable national laws and regulations, including those laws implementing host country obligations under international law and treaties;
- to the applicable international standards i.e. those issued by:
 - EBRD Performance Requirements (May 2014) and related guidance documents and EU Regulatory framework (EU Regulations and Directives).
 - IFC Performance Standards (2012) and EHS general and sector specific EHS Guidelines.

The project is expected to achieve whichever is more stringent amongst national standards and EBRD Performance Requirements (including EU Regulatory framework). The IFC General EHS Guidelines will be applicable in the absence of applicable Kosovo and EU standards.

3.1 National standards and regulation

Table 2: National standards and regulations

Kosovo Reg. Gaz. Date
Law No.03/L –212 on Labour
Law No 04/L-161 on Safety and Health at Work
Law No. 04/L-219 on Foreigners
Law No.05/L-023 on Breastfeeding
Law No. 04/L-011 on Organizing trade union in Kosovo
Law No. 03/L-200 on Strikes
Law No. 04/L-006 on Social Economic Council

3.2 International standards

Table 3: International standards

International standards
EBRD Environmental and Social Policy and Performance Requirements (PR)
EBRD PR4: Health and safety
Directive 2008/50/EC
Directive 97/68/EC
Workers' accommodation: processes and standards. A guidance note by IFC and the EBRD

International standards
Directive 89/391/EEC
IFC Performance Standards (PS) and Guidance Notes (GN)
IFC General EHS Guidelines: § 2 Occupational Health and Safety
IFC General EHS Guidelines: Construction and Decommissioning § 4.2 Occupational Health and Safety
IFC General EHS Guidelines:
IFC Industry Sector Guidelines: EHS Guidelines for Wind Energy § 1.2 § 2.2
IFC Industry Sector EHS Guidelines: Electric Power Transmission and Distribution § 1.2,

3.3 Project limit values

Occupational exposure limits set by EU Directives shall apply. The need for conducting specific survey for workers exposures (e.g. for noise, vibrations, dust, airborne asbestos fibers and chemicals) will be assessed as part of the Job Hazard Analysis to be conducted by Contractor and Subcontractors.

4.0 MITIGATION MEASURES/ACTION

Based on the ESIA the potential impacts on environmental components deriving from OHS management during the construction phase are:

- Fulfilling construction works
 - land works
 - external fence building
 - structural design achievement
 - foundations and footing excavation
 - BAP platform building
 - scaffolding building
 - pillar assembly works
 - glide mounting
 - acceptance test performing
- Specific hazards:
 - Working at heights
 - Loading/unloading weights
 - Confined areas and spaces
- Collateral hazards:

- Access control
- Demand for freshwater
- Change in land use and ownership
- Demand for workforce
- Demand for goods, materials and services

4.1 Occupational health & safety aspects

Main OHS aspects to be addressed by the Contractor's OHS plan are:

- Over-exertion, and ergonomic injuries and illnesses;
- Slips and Falls on the same elevation
- Work in heights, falls from elevation
- Struck by Objects related to the potential fall of materials or tools
- Exposure to dust generated by various sources
- Confined Spaces and Excavations
- Moving Machinery
- Exposure to chemicals, hazardous or flammable materials, and wastes.

A JHAs is required for each position of the workforce; the JHA shall indicate OHS procedures and work instruction to be developed by all the companies that operate on the Construction Site and that will carry out the operation and maintenance of the windfarm once completed.

The procedure and work instructions have to be appropriate to the nature and scale of the Project and have to contain provision of preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances.

The process of identifying hazards, assessing risks and issuing HS procedures is a continuous process and have to be repeated/carried out every time significant changes to working conditions occurs or new working operations or new type of machineries are used for the Project purposes. The OHS procedures and work instruction are therefore subject to continuous revision based on the outcomes of the risk assessment process.

SOWI employees are not directly involved in construction and/or operation in their organization. Construction operations are organized and carried out by the EPC Contractor and its Subcontractors. SOWI employees carry out mainly office activities and some field activities consisting mainly on inspections and auditing.

During the execution of the works under the Construction Contracts, the Contractor shall comply with the applicable national and international requirements detailed in section "Legal and Other requirements" of this Manual. The Contractor shall implement and demonstrate compliance with these requirements at all times.

The Contractor has to address the requirements of those applicable standards in the form of a Specific Construction OHS Plan that meets SOWI's Minimum OHS Standards for Construction Contracts and specific Project requirements stated in the ESIA and this manual. Project Work Procedures/Instructions, detailing the operating criteria required to implement the standards developed through Job Hazard Analysis.

A list of OHS procedure and work instruction that may be required to be prepared by Contractor and Subcontractors for their workers is provided below (the need for OHS procedures and work instruction is based on the JHA):

- Training and Orientation
- Office Safety
- Travel Safety
- Emergency Preparedness (Medical, Fire, Chemical, Weather)
- Permit to Work
- Substance Abuse Prevention Program
- Work Hour Control/Working Alone
- Security
- Industrial Hygiene
- Eating and Sanitation Facilities
- Working in Heat
- Abrasive Blasting
- Hazard Communications
- Control of Substances Hazardous to Health
- Control of natural occurring asbestos
- Pre-Project Medical Examination — International/National
- Prevention of diseases
- Ionizing Radiation Control
- Personal Protective Equipment
- Fall Protection/Working at height
- Hot Work (Welding, Cutting, Burning)
- Pressurized/Compressed Air Equipment and Compressed Gas Cylinders/Operations
- Cranes and Rigging — Introduction/Pre-use
- Loading and Unloading Material
- Powered Industrial Trucks (Forklifts)
- Aerial Lifts, Elevating Work Platforms, and Material/Personnel Hoists
- Working Near Overhead Power Lines
- Portable Ladders
- Scaffolds

- Manual Handling
- Hand and Portable Power Tools
- Electrical Work Safety
- Excavation, Trenching, and Shoring
- Earthwork, Concrete, and Masonry
- Drill and Blast Operations
- Hot Tapping
- Steel Erection
- High-Pressure Water Cleaning
- Tank and Piping System Testing
- Confined Space Entry
- Accommodation H&S requirements

In addition, the Contractor has to ensure that;

- The resources are in place to implement the requirements of the ESMS;
- The Contractor personnel receive the required training for the safe performance of the assigned tasks;
- Systems are in place for routine auditing and inspection to ensure the compliance with the applicable national and international requirements and conformity with SOWI ESMS requirements;
- Systems are in place for reporting and investigations of environmental events, near-misses, accidents, incidents and potential hazards within an agreed and legally required timeframe.

The Contractor has to provide progress updates to SOWI on an agreed basis on the OHS performance.

The Contractor has to keep all the records and other relevant documentation to demonstrate compliance/conformity to Project requirements for the duration of the Contract.

The following table details the environmental management and mitigation measures/actions identified for OHS management activities during construction phase. For each measure/action identified, the table shows:

- Item: the identification code of the mitigation measure/actions (ID.);
- Measure/Actions: description of the mitigation measure/ actions;
- Source document: is the reference to one or more applicable standard (i.e. National Regulation and Permits, EBRD Performance Requirements and related EU Regulations/Directives, IFC PS/Guidelines, or other GIIP);
- Timeline and frequency: frequency/timing of the measure/action;
- KPI (Key performance indicator): quantitative compliance indicator or qualitative acceptance criteria that can be used to verify the actual effectiveness of the mitigation measure/actions;
- Responsibility: resource responsible for implementing the measures/actions;

- WF/OHL: indication whether the measure/action is applicable to the Wind Farm (WF) and/or Overhead Line (OHL)

The aim of the “mitigation hierarchy” (avoidance, minimization, rehabilitation/restoration, offset) is applied for the selection of the measures to limit as far as possible negative impacts to the environment.

This process is intended as an adaptive management system of the project, so that the mitigation and management approach will be adapted based on any new findings which could arise from the monitoring program described in the following section.

4.2 Construction

Table 4: Mitigation measures/actions for construction phase

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
OHS0 1	<p>Avoidance of the risk:</p> <p>Provided to all Project workers a safe and healthy work environment. Employers and managers must implement all reasonable precautions to protect the health and safety of workers and to prevent accidents, injuries and diseases associated with the Project. This will be achieved by:</p> <ul style="list-style-type: none"> ▪ identifying potential hazards to workers through Job Hazard Analysis (JHA); ▪ Enforce workers code of conduct ▪ provision of preventive and protective measures for the hazards identified to be included in specific OHS procedures and instructions, ▪ training of workers; ▪ OHS inspections and audits; ▪ accidents, injuries and diseases reporting and root causes investigation; ▪ medical surveillance system in place and appointment of an occupational physician; ▪ emergency prevention, preparedness, and response 	<p>EBRD PR4 §23 IFC- EHS GL – § 2, §4.2 EHS GL for Wind Energy § 1.2 § 2.2 EU directives on OHS</p>	<p>During construction phase on a continuous basis</p>	<p>As defined by the specific OHS procedures i.e.</p> <ul style="list-style-type: none"> - documented JHA and related measures in place - general training courses attended and hours, - reported incident/accidents, - number of OHS inspections and audits conducted, - reporting system for accidents, injuries and diseases and related root causes investigation system in place - ERP in place 	<p>Contractor and Subcontractors SOWI for collecting data</p>	<p>WF/OHL</p>

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
<p>OHS0 2</p>	<p><u>Minimization of the risk:</u> Develop OHS Plan, procedures and instructions setting preventive and protective (including details of PPEs to be provided and used) measures for the hazards identified. The system in place shall:</p> <ul style="list-style-type: none"> ■ comply with all applicable Kosovo legislation as well as relevant EU Directives on OHS; ■ implement internationally recognized good management/industry practices (GIIP); ■ adhere to high standards of safety and care for the protection of the employees and public; ■ promote its policies through training, supervision, regular reviews and consultation ■ Cooperate and coordinate with local health and safety facilities to minimize impacts on health centres and access for the local population. 	<p>EBRD PR4 §23 IFC- EHS GL – § 2, §4.2 GIIP: EHS GL for Wind Energy § 1.2 § 2.2</p>	<p>During construction phase on a continuous basis</p>	<p>As defined by the specific OHS procedures i.e.</p> <ul style="list-style-type: none"> - OHS plan, working procedures and instructions in place - training courses (on risk specific procedures and instructions) attended and hours, - Defined list of PPEs for each Job - Workers consultation system in place in relation to OHS matters 	<p>Contractor and Subcontractors SOWI for collecting data</p>	<p>WF/OHL</p>
<p>OHS0 3</p>	<p><u>Avoidance/Minimization of the risk:</u> Compliance with IFC/EBRD Guidance on workers accommodation regarding camp(s), including, but not limited to,</p> <ul style="list-style-type: none"> ■ changing areas, ■ drinking water, 	<p>IFC /EBRD Guidance on workers' accommodation</p>	<p>During construction phase on a continuous basis</p>	<p>Compliance with IFC /EBRD Guidance</p>	<p>Contractor and Subcontractors SOWI for collecting data</p>	<p>WF/OHL</p>

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> ■ eating areas, ■ toilets, ■ washing facilities including showers. 					

4.3 Operation

Table 5: Mitigation measures/actions for operation phase

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
OHS 04	<p><u>Avoidance of the risk:</u></p> <p>A safe and healthy work environment shall be provided to all workers; Employers and managers must implement all reasonable precautions to protect the health and safety of workers and to prevent accidents, injuries and diseases associated with the operation activities. This will be achieved by:</p> <ul style="list-style-type: none"> ■ identifying potential hazards to workers through Job Hazard Analysis (JHA); ■ Enforce workers code of conduct ■ provision of preventive and protective measures for the hazards identified to be included in specific OHS procedures and instructions, ■ training of workers; 	<p>EBRD PR4 §23 IFC- EHS GL – § 2, §4.2 EHS GL for Wind Energy § 1.2 § 2.2 EU directives on OHS</p>	<p>During operation phase on a continuous basis</p>	<p>As defined by the specific OHS procedures i.e.</p> <ul style="list-style-type: none"> - documented JHA and related measures in place - general training courses attended and hours, - reported incident/accidents, - number of OHS inspections and audits conducted, - reporting system for accidents, injuries and diseases and related root 	<p>Contractor and Subcontractors</p> <p>SOWI for collecting data</p>	<p>WF/OHL</p>

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF/OHL
	<ul style="list-style-type: none"> ▪ OHS inspections and audits; ▪ accidents, injuries and diseases reporting and root causes investigation; ▪ medical surveillance system in place and appointment of an occupational physician; ▪ emergency prevention, preparedness, and response 			<p>causes investigation system in place ERP in place</p>		
<p>OHS 05</p>	<p><u>Minimization of the risk:</u> Develop OHS Plan, procedures and instructions setting preventive and protective (including details of PPEs to be provided and used) measures for the hazards identified. The system in place shall:</p> <ul style="list-style-type: none"> ■ comply with all applicable Kosovo legislation as well as relevant EU Directives on OHS; ■ implement internationally recognized good management/industry practices (GIIP); ■ adhere to high standards of safety and care for the protection of the employees and public; ■ promote its policies through training, supervision, regular reviews and consultation 	<p>EBRD PR4 §23 IFC- EHS GL – § 2, §4.2 GIIP: EHS GL for Wind Energy § 1.2 § 2.2</p>	<p>During operation phase on a continuous basis</p>	<p>As defined by the specific OHS procedures i.e.</p> <ul style="list-style-type: none"> - OHS plan, working procedures and instructions in place - training courses (on risk specific procedures and instructions) attended and hours, - Defined list of PPEs for each Job - Workers consultation system in place in relation to OHS matters 	<p>Contractor and Subcontractors</p> <p>SOWI for collecting data</p>	<p>WF/OHL</p>
<p>OHS 06</p>	<p><u>Avoidance/Minimization of the risk:</u> Compliance with IFC/EBRD Guidance on workers accommodation regarding camp(s), including, but not limited to,</p>	<p>IFC /EBRD Guidance on workers'</p>	<p>During operation phase on a</p>	<p>Compliance with IFC /EBRD Guidance</p>	<p>Contractor and Subcontractors</p>	<p>WF/OHL</p>

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> ■ changing areas, ■ drinking water, ■ eating areas, ■ toilets, ■ washing facilities including showers. 	accommodation	continuous basis		SOWI for collecting data	

5.0 MONITORING ACTIONS

The following table details the monitoring actions identified for OHS management activities during the construction phase. The aim of the monitoring actions is to verify whether the residual impacts are under control and the mitigation measures/action have been effective.

For each monitoring measure/action identified, the table shows:

- Item: the identification code of the monitoring activity (ID.);
- Monitoring Activity: description of the monitoring activity;
- Source document: is the reference to one or more applicable standard or limit value (i.e. National Regulation and Permits, EBRD Performance Requirements and related EU Regulations/Directives, IFC PS/Guidelines, or other GIIP);
- Timeline and frequency: frequency/timing of the monitoring activity;
- KPI (Key performance indicator): regulatory limit value or qualitative acceptance criteria to comply with;
- Responsibility: resource responsible for implementing the monitoring activity;
- WF/OHL: indication whether the measure/action is applicable to the Wind Farm (WF) and/or Overhead Line (OHL)

5.1 Construction

Table 6: Monitoring actions

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
OHS0 7	Put in place OHS audits and inspections program and implemented an information system for tracking Non-Conformities / Non-Compliances Put in place statistics on accidents, injuries and diseases	EBRD PR4 IFC- EHS GL – § 2, § 4.2 Occupational Health and Safety EHS GL for Wind Energy § 1.2 § 2.2 Directive 2008/50/EC Directive 97/68/EC Directive 89/391/EEC	HSE Inspections: Weekly HSE Audits: Quarterly Others: As per the specific OHS procedures to be developed	Non-Conformities/ Non-Compliances tend to zero Injuries tend to zero No fatal or serious injuries	Contractor and Subcontractors SOWI for collecting data	WF/OHL
OHS0 8	In case the JHA identify the need for specific workers exposures surveys conduct the surveys using methodologies indicated in the EU directives (or national regulation if any).	Directive 2008/50/EC Directive 97/68/EC Directive 89/391/EEC	As indicated by the JHA	In any case below the exposure threshold If 10%% of the threshold is exceeded risk reduction measures will have to be implemented	Contractor and Subcontractors SOWI for collecting data	WF/OHL
OHS0 9	Workers (including Subcontractors' workers) must be made aware that their grievances related to OHS issues can be addressed through the priority communication channels:	Law on OHS	During construction phase	Grievances recorded Grievances responded	NOTUS to record and provide data regarding local procurement to SOWI.	WF/OHL

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> ■ OHS Committees attended by workers representatives; ■ Workers' grievance mechanism. 				SOWI for collecting data	

5.2 Operation

Table 7: Monitoring action for operation phase

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
OHS 10	Put in place OHS audits and inspections program and implemented an information system for tracking Non-Conformities / Non-Compliances Put in place statistics on accidents, injuries and diseases	EBRD PR4 EBRD IFC- EHS GL – § 2, § 4.2 EHS GL for Wind Energy § 1.2 § 2.2 Directive 2008/50/EC Directive 97/68/EC Directive 89/391/EEC	HSE Inspections: Weekly HSE Audits: Quarterly Others: As per the specific OHS procedures to be developed	Non-Conformities / Non-Compliances tend to zero Injuries tend to zero No fatal or serious injuries	Contractor and Subcontractors SOWI for collecting data	WF/OHL
OHS 11	In case the JHA identify the need for specific workers exposures surveys conduct the surveys using methodologies indicated in the EU directives (or national regulation if any).	Directive 2008/50/EC Directive 97/68/EC Directive 89/391/EEC	As indicated by the JHA	In any case below the exposure threshold If 10%% of the threshold is exceeded risk reduction	Contractor and Subcontractors SOWI for collecting data	WF/OHL

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF/OHL
				measures will have to be implemented		
OHS 12	<p>Workers (including Subcontractors' workers) must be made aware that their grievances related to OHS issues can be addressed through the priority communication channels:</p> <ul style="list-style-type: none"> ■ OHS Committees attended by workers representatives ■ Workers' grievance mechanism. 	Law on OHS	During construction phase	<p>Grievances recorded</p> <p>Grievances responded</p>	<p>NOTUS to record and provide data regarding local procurement to SOWI.</p> <p>SOWI for collecting data</p>	WF/OHL

Main OHS aspects to be addressed by the Contractor's OHS plan are:

- Over-exertion, and ergonomic injuries and illnesses;
- Slips and Falls on the same elevation
- Work in heights, falls from elevation
- Struck by Objects related to the potential fall of materials or tools
- Exposure to dust generated by various sources
- Confined Spaces and Excavations
- Moving Machinery
- Exposure to chemicals, hazardous or flammable materials, and wastes.

A JHAs is required for each position of the workforce; the JHA shall indicate OHS procedures and work instruction to be developed by all the companies that operate on the Construction Site and that will carry out the operation and maintenance of the windfarm once completed.

The procedure and work instructions must be appropriate to the nature and scale of the Project and have to contain provision of preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances.

The process of identifying hazards, assessing risks and issuing HS procedures is a continuous process and have to be repeated/carried out every time significant changes to working conditions occurs or new working operations or new type of machineries are used for the Project purposes. The OHS procedures and work instruction are therefore subject to continuous revision based on the outcomes of the risk assessment process.

SOWI employees are not directly involved in construction and/or operation in their organization. Construction operations are organized and carried out by the EPC Contractor and its Subcontractors. SOWI employees carry out mainly office activities and some field activities consisting mainly on inspections and auditing.

During the execution of the works under the Construction Contracts, the Contractor shall comply with the applicable national and international requirements detailed in section "Legal and Other requirements" of this Manual. The Contractor shall implement and demonstrate compliance with these requirements at all times.

The Contractor has to address the requirements of those applicable standards in the form of a Specific Construction OHS Plan that meets SOWI's Minimum OHS Standards for Construction Contracts and specific Project requirements stated in the ESIA and this manual. Project Work Procedures/Instructions, detailing the operating criteria required to implement the standards developed through Job Hazard Analysis.

A list of OHS procedure and work instruction that may be required to be prepared by Contractor and Subcontractors for their workers is provided below (the need for OHS procedures and work instruction is based on the JHA):

- Training and Orientation
- Office Safety
- Travel Safety
- Emergency Preparedness (Medical, Fire, Chemical, Weather)
- Permit to Work

- Substance Abuse Prevention Program
- Work Hour Control/Working Alone
- Security
- Industrial Hygiene
- Eating and Sanitation Facilities
- Working in Heat
- Abrasive Blasting
- Hazard Communications
- Control of Substances Hazardous to Health
- Control of natural occurring asbestos
- Pre-Project Medical Examination — International/National
- Prevention of diseases
- Ionizing Radiation Control
- Personal Protective Equipment
- Fall Protection/Working at height
- Hot Work (Welding, Cutting, Burning)
- Pressurized/Compressed Air Equipment and Compressed Gas Cylinders/Operations
- Cranes and Rigging — Introduction/Pre-use
- Loading and Unloading Material
- Powered Industrial Trucks (Forklifts)
- Aerial Lifts, Elevating Work Platforms, and Material/Personnel Hoists
- Working Near Overhead Power Lines
- Portable Ladders
- Scaffolds
- Manual Handling
- Hand and Portable Power Tools
- Electrical Work Safety
- Excavation, Trenching, and Shoring
- Earthwork, Concrete, and Masonry
- Drill and Blast Operations
- Hot Tapping

- Steel Erection
- High-Pressure Water Cleaning
- Tank and Piping System Testing
- Confined Space Entry
- Accommodation H&S requirements

In addition, the Contractor has to ensure that;

- The resources are in place to implement the requirements of the ESMS;
- The Contractor personnel receive the required training for the safe performance of the assigned tasks;
- Systems are in place for routine auditing and inspection to ensure the compliance with the applicable national and international requirements and conformity with SOWI ESMS requirements;
- Systems are in place for reporting and investigations of environmental events, near-misses, accidents, incidents and potential hazards within an agreed and legally required timeframe.

The Contractor has to provide progress updates to SOWI on an agreed basis on the OHS performance.

The Contractor has to keep all the records and other relevant documentation to demonstrate compliance/conformity to Project requirements for the duration of the Contract

The contractor is required to develop an OHS monitoring program. The OHS monitoring program should verify the effectiveness of prevention and control strategies. The selected indicators should be representative of the most significant occupational, health, and safety hazards, and the implementation of prevention and control strategies. Therefore, the OHS monitoring program have to be closely linked to the findings of JHA. The occupational health and safety monitoring program to be developed by Contractor has to include, as a minimum:

Safety inspection, testing and calibration of:

- OHS critical equipment (i.e. forklifts, cranes and lifts)
- All safety features and hazard control measures focusing on engineering and personal protective features (i.e. PPE continues to provide adequate protection and is being worn as required);
- Hazardous work procedures (i.e. permit to work),
- Monitoring of the workers exposure: Monitoring methodology, locations, frequencies, and parameters should be established individually for each task or activity following the JHA (i.e. dust monitoring, confined space air quality monitoring)

6.0 AUDIT AND REVIEW

The correct implementation of this Management Plan is verified through internal inspections and audits to be carried out according to the requirements included in section "Internal audit" of the "ESMS Manual" and in the "Audit and Non-Conformities Procedure".

The schedule, the frequency, the scope and objectives of the audit as well as the responsible internal auditors are indicated in the Audit Program that is developed and updated by SOWI.

Internal auditing shall address:

- The correct implementation of this Management Plan

- The correct development and implementation of Contractor's Plan
- The correct and timely implementation of an auditing and review system by the Contractor
- Each of the point indicated in the tables in section 4.0 (mitigation measures/actions) and 5.0 (monitoring activities) of this plan
- the establishment of a stakeholder engagement process related to the aspects addressed by this Management Plan.

Evidences and results of the inspection and audit activities are included in the audit reports and in the "Non-Conformity and Preventive/Corrective actions" records.

SOWI Management reviews results of inspections and audits and the progress of the Preventive/Corrective actions and takes additional appropriate actions if necessary, according to the indications included in section 7 "Management Review" of the ESMS Manual.

During steady state operations, this Management Plan will be reviewed on an annual basis and any necessary revisions made to reflect the changing circumstances, operational needs or monitoring results. Revision of this Management Plan will be the responsibility of the HSE Manager, who is in charge of this Plan.

7.0 REPORTING

This section provides instructions and requirements for the reporting related to mitigation measures/actions, to monitoring activities and to internal auditing.

7.1 Reporting of the monitoring activities

Evidences and results of the monitoring activities (detailed in section 5.0) have to be described in detail in appropriate monitoring reports. These monitoring reports must include the following minimum information/data (where relevant):

- analytical certificates from the laboratory/ies;
- localization of the monitoring activities (geographical coordinates in WGS84 system and elevation);
- timing of the data collection (start date and end date);
- description of the applied methodology;
- KPI (Key performance indicator): regulatory limit value or qualitative acceptance criteria to comply with;
- the responsibility for implementing the specific monitoring activities (including reference to this Management Plan and reference to the appointment of third parties eventually contracted to perform part of the activity (e.g. external laboratories and consultants);
- conclusions on compliance vs. KPI and eventual observations;
- quality control procedures applied to ensure consistency and reliability of the analyses or results.

7.2 Reporting of the auditing activities

The correct implementation of this Management Plan is to be verified through internal audits to be carried out according to the requirements included in the "ESMS Manual", the internal auditing procedure and section 6.0 "Audit and review" of this Management Plan.

Evidences of the implementation of the mitigation measures/actions (detailed in section 4.0), of the timely deployment of monitoring activities (detailed in section 5.0) and of related results are described in the audit reports. These audit reports must include the following minimum information/data:

- list of the items audited (detailed in sections 4.0 and 5.0);
- information whether the items have been implemented within the indicated timeline and frequency;
- achievement (or not) of the KPIs;
- description of non-compliances eventually identified.

7.3 Self-monitoring report

Monitoring data together with the results of the audit activities will be summarized in a Self-Monitoring Report on a quarterly basis that will be provided every quarter to the Lenders and eventually to stakeholders as further described in the “ESMS Manual”.



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Bajgora Wind Project

Pollution Prevention Management Plan (PP MP)

Submitted to:

SOWI Kosovo

Submitted by:

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19122298/12274 Final

October 3rd, 2019



Acronyms

PP pollution Prevention

ESMS Environmental and Social Management System

EBRD European Bank for Reconstruction and Development

IFC International Finance Corporation

KPI Key Performance Indicators

PR Performance Requirement (issued by EBRD)

PS Performance Standard (issued by IFC)

HSE Health, Safety and Environment

ESIA Environmental and Social Impact Assessment

EPC Engineering Procurement and Construction

ERP Emergency Response Plan

EU European Union

ESHS Environmental, Social Health and Safety

ESMP(s) Environmental and Social Management Plan(s)

MP Management Plan

WF Wind Farm

OHL Overhead line

GIIP Good International Industry Practice

OHS Occupational Health and Safety

BAT Best Available Technology

ISO International Organization for Standardization

Client:	SOWI (Solar & Wind) Kosovo
Project:	Wind Farm Selac 1, 2 and 3 located near the village of Bajgora in the municipality of Mitrovica, in Northern Kosovo. It includes 20 km connection powerline.
Facilities:	The project consists of 27 WTGs type GE 3.8-137 with a capacity of 3.83 MW with a hub height of 110 m and total capacity of 103.41 MW. The energy will be connected to the existing grid through an 110kV overhead line (OHL), having approximately 20 km length. The power line is considered part of the Project during its construction and will be considered an associated facility for the operation phase.
EPC Contractor:	NOTUS
Site Management:	All key managerial roles involved in the Construction Site management and in the windfarm operation, mainly referring to the SOWI personnel.

Table of Contents

- 1.0 PURPOSE AND SCOPE2**
- 2.0 ROLES AND RESPONSIBILITIES.....4**
- 3.0 BACKGROUND POLICIES AND STANDARDS.....6**
 - 3.1 National standards and regulation6
 - 3.2 International standards.....6
 - 3.3 Project limit values7
- 4.0 MITIGATION MEASURES/ACTION9**
 - 4.1 Construction11
 - 4.2 Operation.....18
- 5.0 MONITORING ACTIONS26**
 - 5.1 Construction27
 - 5.2 Operation.....31
- 6.0 AUDIT AND REVIEW.....36**
- 7.0 REPORTING36**
 - 7.1 Reporting of the monitoring activities36
 - 7.2 Reporting of the auditing activities37
 - 7.3 Self-monitoring report.....37

TABLES

- Table 1: Roles and responsibilities4
- Table 2: National standards and regulations6
- Table 3: International standards6
- Table 4 Project standards – air quality7
- Table 5 Project standards - Noise9
- Table 6 Project standards - Wastewater9
- Table 7: Mitigation measures/actions for construction phase11
- Table 8: Mitigation measures/actions for operation phase18
- Table 9: Monitoring actions27
- Table 10: Monitoring actions for operation phase31

1.0 PURPOSE AND SCOPE

This Pollution Prevention (PP) Management Plan (MP) identifies and presents the framework and the strategy for implementing SOWI Environmental and Social Management System (ESMS) in relation to Pollution Prevention aspects.

It has been developed in accordance with SOWI policies, with the commitments undertaken in the ESIA, with Kosovo regulatory framework, with EBRD Environmental and Social Policy and Performance Requirements PR3, IFC Performance Standards PS 3 and IFC General and Sector Specific EHS Guidelines.

This PP MP applies to both **construction phase** and **operation phase** of the Project. It provides also guidelines to the contractor in charge for the Engineering Procurement and Construction (EPC) activities of the Project for addressing Environmental and Social aspects according to the standards mentioned above.

Additional details related to the operation phase of the Project are expected to come in due course; it is therefore recommended that this plan is subject to a systematic review process before start of operations in order to encompass and consider any information relevant to the PP matters.

Pollution prevention in this plan is intended as prevention of the pollution that may be generated by:

- Waste generation, management and handling
- Wastewater stream discharges
- Emission to air affecting Air Quality
- Noise emissions
- Hazardous Materials management and handling
- Resource efficiency

The Purpose of this MP is to define:

- Project standards for managing PP matters during the construction phase;
- the scope and applicable interphases for the management of addressing PP management and monitoring activities during the construction phase;
- responsibilities, commitments, operating procedures and instructions for the implementation of this MP;
- the mitigation measures applicable to the Project in relation to PP aspects;
- and manage the monitoring activities performance in relation to PP aspects.

This MP applies to normal operating conditions during the construction and operation activities and does not specifically address any emergency situation. Emergencies are addressed in a specific Emergency Response Plan (ERP).

The overall objective of this MP is to identify the mitigation and monitoring measures in order to:

- adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimize and restore impacts to the environment;
- develop and implement policies, plans and procedures to integrate environmental and social aspects within the overall project management framework throughout its lifecycle;
- establish a monitor program to assess the effects of residual impacts on the environment;

- report the results of the periodic audits and provide for corrective actions, if necessary, in order to reach the planned objectives.

2.0 ROLES AND RESPONSIBILITIES

Principal roles and responsibilities for the implementation of this plan are in Table 1 outlined below.

Table 1: Roles and responsibilities

Role	Overall responsibilities	Specific responsibilities
Management	<ul style="list-style-type: none"> ■ Management will ensure sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of actions, measures and monitoring activities under SOWI's responsibility. ■ This will include the selection of specialized contractor(s) for specific tasks to be carried out as part of the implementation of this Management Plan such as (but not limited to) PP management surveys, monitoring activities and data analysis and reporting; ■ designating specific personnel on site or at the administrative level, clearly define their roles and responsibilities within the environmental and social management system; 	<ul style="list-style-type: none"> ■ Final approval of this Management Plan and subcontractors' plans/procedures for the Project; ■ Taking appropriate actions to address major Non-Conformities based on audit reports, performance monitoring reports and on SOWI HSE Manager proposed approach
HSE Manager	<ul style="list-style-type: none"> ■ Ensuring that this Plan is up to date and appropriate to the nature and scale of the Project and ensuring that this Management Plan is implemented effectively; ■ Programming inspections and audit activities to ensure the correct implementation of this Management Plan; and of specialized contractor(s) tasks ■ Collecting, organizing and reviewing monitoring data and performance monitoring reports provided by the specialized contractor(s) and providing summary results of such reports to Management, to stakeholders and to the Lenders 	<ul style="list-style-type: none"> ■ Ensuring that action/measures and monitoring activities directly under SOWI responsibilities are carried out timely and adequately according to this Management Plan requirements; ■ addressing Non-Conformities through the definition of Preventive/Corrective actions proposing to Management, if necessary, amendments and/or updates to this Management Plan and issuing plan revisions; ■ bringing major Non-Conformities immediately to the attention of Management;

Role	Overall responsibilities	Specific responsibilities
EPC contractor and subcontractors	<ul style="list-style-type: none"> ■ will ensure sufficient and qualified resources are allocated ■ effective execution of the specific tasks assigned in conformity with this Management Plan and with contractual arrangements; ■ respect of EHS requirements included in the ESMS; ■ agree with the timing and logistics of the monitoring activities 	<ul style="list-style-type: none"> ■ provide relevant monitoring data and monitoring reports to as indicated in this plan; ■ may propose changes and integrations to the monitoring activities included in the Management Plan; the proposed changes shall be evaluated and approved by HSE Manager and by Management.
All employees and contractors	<ul style="list-style-type: none"> ■ Comply with environmental management requirements. ■ Report any activities which are causing unnecessary biodiversity issues. 	<ul style="list-style-type: none"> ■ Give evidence that the relevant mitigation measures identified in the current PP management plan are being properly considered, implemented and monitored during execution of the works.

3.0 BACKGROUND POLICIES AND STANDARDS

This section includes all those policies, standards and requirements of reference for this Management Plan that are applicable to the Project during the construction phase.

This section includes references

- to applicable national laws and regulations, including those laws implementing host country obligations under international law and treaties;
- to the applicable international standards i.e. those issued by:
 - EBRD Performance Requirements (May 2014) and related guidance documents and EU Regulatory framework (EU Regulations and Directives).
 - IFC Performance Standards (2012) and EHS general and sector specific EHS Guidelines.

The project is expected to achieve whichever is more stringent amongst national standards and EBRD Performance Requirements (including EU Regulatory framework). The IFC General EHS Guidelines will be applicable in the absence of applicable Kosovo and EU standards.

3.1 National standards and regulation

Table 2: National standards and regulations

Kosovo Reg. Gaz. Date
Law no. 03/I-025 on environmental protection
Law no. 03/I-043 on integrated prevention pollution control
Law no.03/I–233 of nature protection
Law no. 03/I-214 on environmental impact assessment
Law no.03/I –230 on strategic environmental assessment
Law no. 03/I-160 on air protection from pollution
Law no. 04/I-174 on spatial planning

3.2 International standards

Table 3: International standards

International standards
EBRD Environmental and Social Policy and Performance Requirements (PR)
EBRD Performance Requirements 3 - Resource Efficiency and Pollution Prevention and Control
Directive 2008/50/EC
Directive 97/68/EC
IFC Performance Standards (PS) and Guidance Notes (GN)

International standards
IFC PS3: Resource Efficiency and Pollution Prevention
IFC GN3: Resource Efficiency and Pollution Prevention
IFC General EHS Guidelines: § 1 Environmental
IFC General Guidelines: EHS Guidelines for Construction and Decommissioning
IFC Industry Sector Guidelines: EHS Guidelines for Wind Energy § 1.1.2 §1.1.5
IFC Industry Sector Guidelines: EHS Guidelines for Electric Power Transmission and Distribution

3.3 Project limit values

Quantitative limit values applicable to air emission to be applied are presented in the table below. The PP environmental management activities are subject to limit values presented in the IFC values included in the General EHS Guidelines that will be applicable in the absence of applicable Kosovo and EU limit values.

Table 4 Project standards – air quality

Pollutant	Time/Averaging Period	Maximum Allowable Limit		
		EU*, **	Kosovo	Project Standard (more stringent will apply)
SO ₂ (µg/m ³)	Hourly	350 µg/m ³		Hourly: 350 µg/m ³
	24 hours	125 µg/m ³	Monthly: 23 µg/m ³ .	Daily: 125 µg/m ³
	Yearly and winter season (Oct 1st – March 31st) (for wildlife and ecosystem)	-	20 µg/m ³	Monthly: 23 µg/m ³ Yearly: 20 µg/m ³
NO ₂ (µg/m ³)	Hourly	200 µg/m ³	200 µg/m ³	200 µg/m ³
	Yearly	40 µg/m ³	40 µg/m ³	40 µg/m ³
PM ₁₀ (µg/m ³)	24 hours	50 µg/m ³	50 µg/m ³	50 µg/m ³
	Yearly	40 µg/m ³	40 µg/m ³	40 µg/m ³
Fine particules (PM _{2.5} , µg/m ³)	Yearly	25 µg/m ³	25 µg/m ³	25 µg/m ³
Settled Dust	24 hours	-		

Pollutant	Time/Averaging Period	Maximum Allowable Limit		
		EU*, **	Kosovo	Project Standard (more stringent will apply)
(mg/m ² day)	Long term	210 mg/m ² day	50 mg/Nm ³	210 mg/m ² day 50 mg/Nm ³
Ozone µg/m ³	Maximum daily 8-hour average in calendar year	120 µg/m ³	>120 µg/m ³	120 µg/m ³
Pb and its compounds in settled dust (mg/m ² day)	Long Term****	-		
Cd and its compounds in settled dust (mg/m ² day)	Long Term	-		
Tl and its compounds in settled dust (mg/m ² day)	Long Term	-		
Lead (Pb) concentration in PM10 (µg/m ³)	1 year	0.5 µg/m ³		0.5 µg/m ³
Arsenic (As) concentration in PM10 (ng/m ³)	1 year	6 ng/m ³		6 ng/m ³
Cadmium (Cd) concentration in PM10 (ng/m ³)	1 year	5 ng/m ³		5 ng/m ³
Nickel (Ni) concentration in PM10 (ng/m ³)	1 year	20 ng/m ³		20 ng/m ³
CO	8h	10 mg/m ³		10 mg/m ³

Table 5 Project standards - Noise

Pollutant	Time/Averaging Period	Maximum Allowable Limit		
		EU*, **	Kosovo	Project Standard (more stringent will apply)
Noise	Daytime (07:00 - 22:00)	70 dBA		70 dBA
	Night-time (22:00 - 07:00)	70 dBA		70 dBA

Table 6 Project standards - Wastewater

Pollutant	Time/Averaging Period	Maximum Allowable Limit		
		EU*, **	Kosovo	Project Standard (more stringent will apply)
pH		6 – 9		6 – 9
BOD		30 mg/l		30 mg/l
COD		125 mg/l		125 mg/l
Total nitrogen		10 mg/l		10 mg/l
Total phosphorus		2 mg/l		2 mg/l
Oil and grease		10 mg/l		10 mg/l
Total suspended solids		50 mg/l		50 mg/l
Total coliform bacteria		400 MPN ^b /100 ml		400 MPN ^b / 100 ml

4.0 MITIGATION MEASURES/ACTION

Based on the ESIA the potential impacts on environmental components deriving from PP during the construction phase are:

- increased exposure to atmospheric emission and pollutants;
- Change in the local morphology;
- Removal/degradation of soil and vegetation.

The following table details the environmental management and mitigation measures/actions identified for PP MP management activities during construction phase. For each measure/action identified, the table shows:

- Item: the identification code of the mitigation measure/actions (ID.);
- Measure/Actions: description of the mitigation measure/ actions;
- Source document: is the reference to one or more applicable standard (i.e. National Regulation and Permits, EBRD Performance Requirements and related EU Regulations/Directives, IFC PS/Guidelines, or other GIIP);
- Timeline and frequency: frequency/timing of the measure/action;
- KPI (Key performance indicator): quantitative compliance indicator or qualitative acceptance criteria that can be used to verify the actual effectiveness of the mitigation measure/actions;
- Responsibility: resource responsible for implementing the measures/actions;
- WF/OHL: indication whether the measure/action is applicable to the Wind Farm (WF) and/or Overhead Line (OHL)

The aim of the “mitigation hierarchy” (avoidance, minimization, rehabilitation/restoration, offset) is applied for the selection of the measures to limit as far as possible negative impacts to the environment.

This process is intended as an adaptive management system of the project, so that the mitigation and management approach will be adapted based on any new findings which could arise from the monitoring program described in the following section.

4.1 Construction

Table 7: Mitigation measures/actions for construction phase

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
PP01	<p>Avoidance (stockpiling materials):</p> <ul style="list-style-type: none"> ■ avoid uncontrolled stockpiling of material excavated; ■ minimize dust production from temporary stockpiles of material excavated, using dust control methods, such as covers or water suppression for open materials storage piles; ■ use of water suppression to reduce dust emissions from the transport of material on unpaved road. ■ in dry periods dirt roads and soil stockpiles should be sprayed with water in order to reduce dust; 	EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP	During dry periods of construction phase	Environmental report	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/O HL
PP02	<p>Avoidance (hazardous materials):</p> <p>To prevent or limit propagation and leakage mitigation measures will be taken:</p> <ul style="list-style-type: none"> ■ Storage tanks and tankers will be used only for their intended purposes, ■ Personnel will be trained on installing and using the necessary equipment to control propagation, ■ Absorbent materials will be used to control leaks, ■ Integrity of tanks and containers will be ensured, and they will always be stored in areas with flood control, 	EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP	During dry periods of construction phase	Environmental report	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/O HL

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF/OHL
	<ul style="list-style-type: none"> ■ Storage tanks will be placed inside overflow pools (which have 10% more volume with respect to the storage tank itself) ■ Areas which are allocated specifically will be provided for loading, unloading and transportation processes of hazardous substances (impermeable ground), ■ Valves and gaskets will be installed correctly, ■ All hoses and washers will be properly positioned before fuels and other liquids are received and distributed. ■ Drip trays will be placed over points that are more statistically inclined to leak and contact points of vehicles, ■ Mobile or portable fuel oil storage tanks will be placed or positioned in a way to mitigate any leak before it reaches natural streams, lakes or other water bodies/courses, and ■ Hose connections will be tightly fastened ■ Residues of propagation will be cleaned completely rather than cleaning the area with a hose 					
<p>PP03</p>	<p><u>Minimization (water, hazardous materials, energy efficiency):</u></p> <p>The resource consumption regarding</p> <ul style="list-style-type: none"> ■ water, ■ fuels ■ electricity/power and ■ raw materials will be minimized as much as possible. 	<p>EBRD PR3 IFC PS3 IFC - EHS GL PS3 IFC - GN3 §16 EHS Guidelines for Wind</p>	<p>Annually</p>	<p>Amounts of commodities consumed</p> <p>Amounts of CO2 emitted</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	<p>WF/OHL</p>

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
		Energy § 1.1.2 §1.1.5 GIIP				
PP04	<p>Minimization (emission to atmosphere):</p> <p>The atmospheric pollutants will be minimised by the use of:</p> <ul style="list-style-type: none"> ■ Closed injection systems and low-level volatility of diesel fuel will be used ■ Dust from open area sources will be minimized by using control measures such as water spraying on the ground before vehicle passage ■ Regulation on Control of Exhaust Gas Emissions use of working machinery with low emissions and good levels of maintenance; ■ use of diesel with low sulphur content; ■ periodic maintenance of machinery with combustion engine; ■ vehicle speed should be reduced on dirt road within and outside the site ■ ensure that all equipment & vehicles used for construction activity are in good condition and are well maintained; ■ ensure that all equipment & vehicles conform to emission and noise norms 	EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP	During dry periods of construction phase	Annual Environmental report	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	Mitigation measures for asbestos airborne fibres emissions are addressed in a separate standalone plan.					
PP05	<p><u>Minimization (waste):</u></p> <p>Waste deriving form activities will be minimized by:</p> <ul style="list-style-type: none"> ■ Reducing waste amount, recycling ■ Where waste cannot be reused, recycled or recovered, it will be disposed properly ■ A temporary waste storage area will be constructed, Wastes will be stored temporarily in durable, leak-proof, safe containers ■ Waste type, code, quantity, source, facility to be sent, transportation information and disposal process will be recorded ■ The domestic solid waste from the workers will be collected in closed containers ■ The waste oils will be collected in separate containers and different kinds of oils shall not be mixed. ■ Waste vegetative oil will be collected separately from other wastes and oils. After delivering the waste vegetative oils to licensed companies, ■ waste tires disposal plan ■ The import of waste tires is forbidden ■ electrical and electronic goods will be recyclable 	EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP	During construction phase	Annual Environmental report	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> ■ Recycling, recovery and disposal of waste electrical electronic goods is performed ■ Iron and steel wastes will be temporarily stored at site and be disposed of by licensed recycling companies. <p>For recycling and disposal, the Contractor shall use only authorised waste contractors and facilities.</p>					
<p>PP06</p>	<p><u>Minimization (wastewater)</u></p> <p>Wastewater will be minimized by:</p> <ul style="list-style-type: none"> ■ Reducing water consumption ■ Managing industrial wastewater through collection and treatment; if not possible dispose of wastewater stream through authorised contractors ■ Domestic Wastewater disposal: use chemical toilets to be managed through authorised contractors 	<p>EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP</p>	<p>During construction phase</p>	<p>Annual Environmental report</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	<p>WF/O HL</p>
<p>PP07</p>	<p><u>Minimization (hazardous materials)</u></p> <p>Hazardous materials will be managed by:</p> <ul style="list-style-type: none"> ■ Transporters of hazardous goods are authorized according to ADR standards; ■ Transporters are certified and have the human resources and appropriate technology for handling, transporting and managing the hazardous materials in question. 	<p>EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP</p>	<p>During construction phase</p>	<p>Annual Environmental report</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	<p>WF/O HL</p>

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> ■ Transporters have procedures for hazardous material management and emergency response procedures in case of an accident; ■ Hazardous materials will only be moved or transferred within the Site areas by qualified, trained vehicle operators, using appropriate industrial forklifts or other vehicles. 					
<p>PP08</p>	<p><u>Minimization (noise)</u></p> <p>Noise level will be minimized by:</p> <ul style="list-style-type: none"> ■ Limiting construction activities will be limited during the night-time. ■ Equipment with lower sound power levels will be selected, it will comply with noise limits according to the power (kW) of equipment. ■ Activities will be planned in consultation with local communities so that activities with the greatest potential to generate noise are planned during periods of the day that will result in the least disturbance. ■ Suitable mufflers on engine exhausts and compressor components will be installed, if required. ■ Hours of operation for specific pieces of equipment or operations, especially mobile sources operating through community areas, will be limited. ■ Project traffic routing through community areas will be reduced wherever possible. 	<p>EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP</p>	<p>During construction phase</p>	<p>Annual Environmental report</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	<p>WF/O HL</p>

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> Regular maintenance will be carried out on construction equipment to ensure noise levels are maintained within requirements. 					
PP09	<p><u>Avoidance (Erosion control and reinstatement)</u></p> <ul style="list-style-type: none"> avoid of off-road vehicular traffic avoid uncontrolled discharge of stormwater from drainage network in correspondence to wind turbines emplacements and access roads avoid uncontrolled dumping of excavated material during the construction of deposit areas avoid stormwater discharge in correspondence to natural wetlands 	EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP	During construction phase	Annual Environmental report	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/O HL
PP10	<p><u>Minimization (Erosion control and reinstatement)</u></p> <ul style="list-style-type: none"> minimize the extension of land levelling and excavation areas; minimize the extension of artificial embankments; minimize erosion of artificial embankments and levelled areas by means of erosion control techniques and erosion protection devices minimize the extension of above ground structures in flood prone areas in the Sitnica River plain area minimize the potential instability of permanent deposit areas by means of geotechnical design, stability assessment and stormwater drainage and management 	EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP	During construction phase	Annual Environmental report	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/O HL

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
PP11	<p>Restore (<u>Erosion control and reinstatement</u>)</p> <ul style="list-style-type: none"> ■ reinstatement of deposit areas by means of a final soil cover that shall be revegetated with indigenous grasses and shrubs; ■ restoration of incipient erosion phenomena in slope areas along access road and in correspondence to wind turbines and OHL pylons 	EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP	During construction phase	Annual Environmental report	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL

4.2 Operation

Table 8: Mitigation measures/actions for operation phase

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
PP12	<p><u>Avoidance (hazardous materials):</u></p> <p>To prevent or limit propagation and leakage mitigation measures will be taken:</p> <ul style="list-style-type: none"> ■ Storage tanks and tankers will be used only for their intended purposes, ■ Personnel will be trained on installing and using the necessary equipment to control propagation, ■ Absorbent materials will be used to control leaks, 	EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP	During dry periods of operation phase	Annual Environmental report	NOTUS to record and provide data to SOWI SOWI for collecting data	

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> ■ Integrity of tanks and containers will be ensured, and they will always be stored in areas with flood control, ■ Storage tanks will be placed inside overflow pools (which have 10% more volume with respect to the storage tank itself) ■ Areas which are allocated specifically will be provided for loading, unloading and transportation processes of hazardous substances (impermeable ground), ■ Valves and gaskets will be installed correctly, ■ All hoses and washers will be properly positioned before fuels and other liquids are received and distributed. ■ Drip trays will be placed over points that are more statistically inclined to leak and contact points of vehicles, ■ Mobile or portable fuel oil storage tanks will be placed or positioned in a way to mitigate any leak before it reaches natural streams, lakes or other water bodies/courses, and ■ Hose connections will be tightly fastened ■ Residues of propagation will be cleaned completely rather than cleaning the area with a hose 					
<p>PP13</p>	<p><u>Minimization (water, hazardous materials, energy efficiency):</u> The resource consumption regarding</p> <ul style="list-style-type: none"> ■ water ■ fuels ■ electricity/power and 	<p>EBRD PR3 IFC PS3 IFC - EHS GL PS3 IFC - GN3 §16</p>	<p>Annually</p>	<p>Amounts of commodities consumed</p> <p>Amounts of CO2 emitted</p>	<p>NOTUS to record and provide data to SOWI</p> <p>SOWI for collecting data</p>	

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> ■ raw materials will be minimized as much as possible. 	EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP				
PP14	<p><u>Minimization (emission to atmosphere):</u></p> <p>The atmospheric pollutants will be minimised by the use of:</p> <ul style="list-style-type: none"> ■ Closed injection systems and low-level volatility of diesel fuel will be used ■ Dust from open area sources will be minimized by using control measures such as water spraying on the ground before vehicle passage ■ Regulation on Control of Exhaust Gas Emissions use of working machinery with low emissions and good levels of maintenance; ■ use of diesel with low sulphur content; ■ periodic maintenance of machinery with combustion engine; ■ in dry periods dirt roads and soil stockpiles should be sprayed with water in order to reduce dust; ■ vehicle speed should be reduced on dirt road within and outside the site ■ Mitigation measures for asbestos airborne fibres emissions are addressed in a separate standalone plan. 	EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP	During dry periods of operation phase	Annual Environmental report	NOTUS to record and provide data to SOWI SOWI for collecting data	

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
PP15	<p><u>Minimization (waste):</u></p> <p>Waste deriving form activities will be minimized by:</p> <ul style="list-style-type: none"> ■ Reducing waste amount, recycling ■ Where waste cannot be reused, recycled or recovered, it will be disposed properly ■ A temporary waste storage area will be constructed, Wastes will be stored temporarily in durable, leak-proof, safe containers ■ Waste type, code, quantity, source, facility to be sent, transportation information and disposal process will be recorded ■ The domestic solid waste from the workers will be collected in closed containers ■ The waste oils will be collected in separate containers and different kinds of oils shall not be mixed. ■ Waste vegetative oil will be collected separately from other wastes and oils. After delivering the waste vegetative oils to licensed companies, ■ waste tires disposal plan ■ The import of waste tires is forbidden ■ electrical and electronic goods will be recyclable ■ Recycling, recovery and disposal of waste electrical electronic goods is performed 	<p>EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP</p>	<p>During operation phase</p>	<p>Annual Environmental report</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> ■ Iron and steel wastes will be temporarily stored at site and be disposed of by licensed recycling companies. ■ For recycling and disposal, the Contractor shall use only authorised waste contractors and facilities. 					
<p>PP16</p>	<p><u>Minimization (wastewater)</u></p> <p>Wastewater will be minimized by:</p> <ul style="list-style-type: none"> ■ Reducing water consumption ■ Managing industrial wastewater through collection and treatment; if not possible dispose of wastewater stream through authorised contractors ■ Domestic Wastewater disposal: use chemical toilets to be managed through authorised contractors 	<p>EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP</p>	<p>During operation phase</p>	<p>Annual Environmental report</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	
<p>PP17</p>	<p><u>Minimization (hazardous materials)</u></p> <p>Hazardous materials will be managed by:</p> <ul style="list-style-type: none"> ■ Transporters of hazardous goods are authorized according to ADR standards; ■ Transporters are certified and have the human resources and appropriate technology for handling, transporting and managing the hazardous materials in question. ■ Transporters have procedures for hazardous material management and emergency response procedures in case of an accident; 	<p>EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP</p>	<p>During operation phase</p>	<p>Annual Environmental report</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> ■ Hazardous materials will only be moved or transferred within the Site areas by qualified, trained vehicle operators, using appropriate industrial forklifts or other vehicles. 					
<p>PP18</p>	<p><u>Minimization (noise)</u></p> <p>Noise level will be minimized by:</p> <ul style="list-style-type: none"> ■ Limiting construction activities will be limited during the night-time. ■ Equipment with lower sound power levels will be selected, it will comply with noise limits according to the power (kW) of equipment. ■ Activities will be planned in consultation with local communities so that activities with the greatest potential to generate noise are planned during periods of the day that will result in the least disturbance. ■ Suitable mufflers on engine exhausts and compressor components will be installed, if required. ■ Hours of operation for specific pieces of equipment or operations, especially mobile sources operating through community areas, will be limited. ■ Project traffic routing through community areas will be reduced wherever possible. ■ Regular maintenance will be carried out on operation equipment to ensure noise levels are within requirements. 	<p>EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP</p>	<p>During operation phase</p>	<p>Annual Environmental report</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> ■ a more precise noise propagation model should be performed in order to better detail the noise levels simulated at any sensitive receptor, in particular: <ul style="list-style-type: none"> ■ according to site-specific atmospheric conditions (wind direction and wind speed); if new simulations should confirm actual results or planned noise measures during operational phase should validate the current estimated noise impact, it will be necessary to consider turning off wind turbines (I-01, I-02 and I-06) closest to receptors RL8, RL10, RL11 and RL12 during night-time (from 22:00 to 06:00). ■ For RL10 and RL11 receptors, that have shown measures results above IFC limit, this mitigation measures allow not worsen the current state. For RL8 receptor, the application of this approach, could mean to be compliance with IFC nocturnal limit. 					
<p>PP19</p>	<p><u>Avoidance (Erosion control and reinstatement)</u></p> <ul style="list-style-type: none"> ■ avoid of off-road vehicular traffic ■ avoid uncontrolled discharge of stormwater from drainage network in correspondence to wind turbines emplacements and access roads ■ avoid uncontrolled dumping of excavated material during the construction of deposit areas 	<p>EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP</p>	<p>During construction phase</p>	<p>Annual Environmental report</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	<p>WF/OHL</p>

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> ■ avoid stormwater discharge in correspondence to natural wetlands 					
PP20	<p>Minimization (<u>Erosion control and reinstatement</u>)</p> <ul style="list-style-type: none"> ■ minimize the extension of land levelling and excavation areas; ■ minimize the extension of artificial embankments; ■ minimize erosion of artificial embankments and levelled areas by means of erosion control techniques and erosion protection devices ■ minimize the extension of above ground structures in flood prone areas in the Sitnica River plain area ■ minimize the potential instability of permanent deposit areas by means of geotechnical design, stability assessment and stormwater drainage and management 	EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP	During construction phase	Annual Environmental report	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL
PP21	<p>Restore (<u>Erosion control and reinstatement</u>)</p> <ul style="list-style-type: none"> ■ reinstatement of deposit areas by means of a final soil cover that shall be revegetated with indigenous grasses and shrubs; ■ restoration of incipient erosion phenomena in slope areas along access road and in correspondence to wind turbines and OHL pylons 	EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP	During construction phase	Annual Environmental report	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL

5.0 MONITORING ACTIONS

The following table details the monitoring actions identified for PP management activities during the construction phase. The aim of the monitoring actions is to verify whether the residual impacts are under control and the mitigation measures/action have been effective.

For each monitoring measure/action identified, the table shows:

- Item: the identification code of the monitoring activity (ID.);
- Monitoring Activity: description of the monitoring activity;
- Source document: is the reference to one or more applicable standard or limit value (i.e. National Regulation and Permits, EBRD Performance Requirements and related EU Regulations/Directives, IFC PS/Guidelines, or other GIIP);
- Timeline and frequency: frequency/timing of the monitoring activity;
- KPI (Key performance indicator): regulatory limit value or qualitative acceptance criteria to comply with;
- Responsibility: resource responsible for implementing the monitoring activity;
- WF/OHL: indication whether the measure/action is applicable to the Wind Farm (WF) and/or Overhead Line (OHL)

5.1 Construction

Table 9: Monitoring actions

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
PP2	<ul style="list-style-type: none"> Periodic visual inspection of temporary stockpiles of material excavated in areas characterized by the potential presence of natural occurring asbestos and check of dust control measures' application 	EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP	Quarterly	Record of visual inspection on stockpiled material	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/O HL
PP23	<ul style="list-style-type: none"> Spill/Pollution response management Use of pollution response equipment, addressed in the ERP <p>(The ERP is a plan typically developed by the EPC contractor and it is very specific to the site and the company; Golder did not develop an ERP but provided some general principles in the ESMS manual; an emergency plan is developed by the contractor NOTUS.)</p>	EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP	Quarterly	No. of spills events occurred and managed No. of spills kit present	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/O HL
PP24	<p>Resource efficiency Quantify the resource consumption on a periodic (i.e. monthly) base by installing appropriate devices; record and aggregate data on consumption of the following resources:</p> <ul style="list-style-type: none"> Water (for industrial and civil purposes) Fuels (for heating, vehicle refuelling, power generation) 	EBRD PR3 IFC PS3 IFC - EHS GL PS3 EHS Guidelines for Wind	Annually	Amounts of commodities consumed Amounts of CO2 emitted	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/O HL

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> ■ Electricity (only if supplied by external sources/network using counters) ■ Raw materials (not hazardous); for construction materials ■ Estimate GHG emissions. If the threshold of 25,000 tonne/year of CO₂eq emissions is exceeded, quantify GHG emissions to air, based on the yearly collected data of fuel and electricity consumption (see previous item). 	Energy § 1.1.2 §1.1.5 IFC - GN3 §16 GIIP				
PP25	<p><u>Air quality:</u></p> <ul style="list-style-type: none"> ■ Monitor PM10, PM2.5 and settled dust emissions at the sensitive receptors if any grievance is received <p>Asbestos airborne fibres monitoring is addressed in a separate standalone plan.</p>	EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP	Quarterly	Projects standards PM10, PM 2.5 and settled dust concentration	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/O HL
PP26	<p><u>Waste:</u></p> <p>Record and aggregate data on amounts of all types of wastes generated at the Construction Site:</p> <ul style="list-style-type: none"> ■ Domestic solid waste ■ Packaging waste ■ Iron and steel ■ Waste batteries and accumulators 	EBRD PR3 IFC PS3 GIIP EHS Guidelines for Wind Energy § 1.1.2 §1.1.5	On annual basis	Daily production for solid domestic waste and monthly for the other wastes	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/O HL

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> ■ Tires ■ Waste oil ■ Waste vegetative oil ■ Medical wastes ■ Hazardous wastes (detail for each type generated) ■ Monitor validity of the waste contractors' authorizations. 					
<p>PP27</p>	<p><u>Wastewater:</u></p> <ul style="list-style-type: none"> ■ Domestic Wastewater disposal ■ Sampling to access storm water quality 	<p>EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP</p>	<p>After a contaminatio n observation and/or grievance from public</p>	<p>Turbidity: no alteration greater than 25 NTU; Oil and grease: no visible film; Foam: no visible presence. In addition: Limit set in section 2 of this plan as mentioned in the IFC General EHS Guidelines</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	<p>WF/O HL</p>
<p>PP28</p>	<p><u>Hazardous materials:</u></p> <p>Record and aggregate data on the amounts of the most prominent hazardous materials entering the Site:</p> <ul style="list-style-type: none"> ■ Diesel oils ■ Brake fluids ■ Lubricating oils 	<p>EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP</p>	<p>Monthly</p>	<p>Amounts</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	<p>WF/O HL</p>

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> Cement additives 					
PP29	<p>Noise:</p> <ul style="list-style-type: none"> Monitor noise levels at the sensitive receptor if any grievance is received 	EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP	After grievance a	Noise level in Section 2 of this Plan as mentioned in the IFC General EHS Guidelines	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL
PP30	<p>Avoidance</p> <ul style="list-style-type: none"> Verification of interdiction to off road vehicular traffic especially in the WF area where slope inclination and soil vulnerability to erosion are higher 	EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP	Weekly	Signals of interdiction	NOTUS to record and provide data to SOWI SOWI for collecting data	WF
PP31	<p>Minimization</p> <ul style="list-style-type: none"> Control and verification of minimized erosion of artificial embankments and levelled areas in wind turbine areas by means of erosion control techniques, for road improvement and construction of storage/deposit areas Control and verification of the extension of above ground structures in flood prone areas in OHL section included between pylons T-4 and T-13 	EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP	Quarterly	Presence of above ground structures in flood prone areas	NOTUS to record and provide data to SOWI SOWI for collecting data	OHL

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
PP32	<p>Avoidance:</p> <ul style="list-style-type: none"> Verification of the avoidance of stormwater discharge in correspondence to natural wetlands, WL_01 e WL_02 	EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP	Quarterly	Presence of stormwater discharge pipeline	NOTUS to record and provide data to SOWI SOWI for collecting data	WF

5.2 Operation

Table 10: Monitoring actions for operation phase

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
PPP P33	<ul style="list-style-type: none"> Spill/Pollution response management Use of pollution response equipment, addressed in the ERP <p>(The ERP is a plan typically developed by the EPC contractor and it is very specific to the site and the company; Golder did not develop an ERP but provided some general principles in the ESMS manual; an emergency plan is developed by the contractor NOTUS.)</p>	EBRD PR3 IFC PS3 IFC - EHS GL PS3 IFC - EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP		<p>No. of spills events occurred and managed</p> <p>No. of spills kit present</p>		WF/OHL

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
PP34	<p>Resource efficiency</p> <p>Quantify the resource consumption on a periodic (i.e. monthly) base by installing appropriate devices; record and aggregate data on consumption of the following resources:</p> <ul style="list-style-type: none"> ■ Water (for industrial and civil purposes) ■ Fuels (for heating, vehicle refuelling, power generation) ■ Electricity (only if supplied by external sources/network using counters) ■ Raw materials (not hazardous) for construction purposes <p>Estimate GHG emissions. If the threshold of 25,000 tonne/year of CO2eq emissions is exceeded, quantify GHG emissions to air, based on the yearly collected data of fuel and electricity consumption (see previous item).</p>	<p>EBRD PR3 IFC PS3 IFC – EHS EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GL PS3 IFC - GN3 §16 GIIP</p>	Annually	<p>Amounts of commodities consumed</p> <p>Amounts of CO2 emitted</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	WF/O HL
PP35	<p>Air quality:</p> <p>Monitor PM10, PM2.5 and settled dust emissions at the sensitive receptors if any grievance is received Asbestos airborne fibres monitoring is addressed in a separate standalone plan.</p>	<p>EBRD PR3 IFC PS3 GIIP EHS Guidelines for Wind Energy § 1.1.2 §1.1.5</p>	Quarterly	Projects standards PM10, PM 2.5 and settled dust concentration	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	WF/O HL
PP36	<p>Waste:</p> <p>Record and aggregate data on amounts of all types of wastes generated at the Construction Site:</p>	<p>EBRD PR3 IFC PS3</p>	On annual basis	Daily production for solid domestic waste	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	WF/O HL

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> ■ Domestic solid waste ■ Packaging waste ■ Iron and steel ■ Waste batteries and accumulators ■ Tires ■ Waste oil ■ Waste vegetative oil ■ Medical wastes ■ Hazardous wastes (detail for each type generated) ■ Monitor validity of the waste contractors' authorizations. 	EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP		and monthly for the other wastes		
PP37	<p><u>Wastewater:</u></p> <ul style="list-style-type: none"> ■ Domestic Wastewater disposal ■ Sampling to access storm water quality 	EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP	After a contamination observation and/or grievance from public	Turbidity: no alteration greater than 25 NTU; Oil and grease: no visible film; Foam: no visible presence. In addition: Limit set in section 2 of this plan as mentioned in the IFC General EHS Guidelines	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
<p>PP38</p>	<p><u>Hazardous materials:</u> Record and aggregate data on the amounts of hazardous materials entering the Site:</p> <ul style="list-style-type: none"> ■ Diesel oils ■ Brake fluids ■ Lubricating oils ■ Paints and Solvents and other organic substances; ■ Cement additives; ■ Acids and bases; ■ Synthetic mineral fibres ■ Gas cylinders (detailed for substance, i.e., acetylene, oxygen, natural gas and LPG) ■ Other hazardous materials etc. 	<p>EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP</p>	<p>Monthly</p>	<p>Amounts</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	<p>WF/O HL</p>
<p>PP39</p>	<p>Noise: Monitor noise levels at the sensitive receptor if any grievance is received</p>	<p>EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP</p>	<p>After grievance a</p>	<p>Noise level in Section 2 of this Plan as mentioned in the IFC General EHS Guidelines</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	<p>WF/O HL</p>

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
PP40	<p>Avoidance</p> <ul style="list-style-type: none"> Verification of interdiction to off road vehicular traffic especially in the WF area where slope inclination and soil vulnerability to erosion are higher 	EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP	Weekly	Signals of interdiction	NOTUS to record and provide data to SOWI SOWI for collecting data	WF
PP41	<p>Minimization</p> <ul style="list-style-type: none"> Control and verification of minimized erosion of artificial embankments and levelled areas in wind turbine areas by means of erosion control techniques, for road improvement and construction of storage/deposit areas Control and verification of the extension of above ground structures in flood prone areas in OHL section included between pylons T-4 and T-13 	EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP	Quarterly	Presence of above ground structures in flood prone areas	NOTUS to record and provide data to SOWI SOWI for collecting data	OHL
PP42	<p>Avoidance:</p> <ul style="list-style-type: none"> Verification of the avoidance of stormwater discharge in correspondence to natural wetlands, WL_01 e WL_02 	EBRD PR3 IFC PS3 EHS Guidelines for Wind Energy § 1.1.2 §1.1.5 GIIP	Quarterly	Presence of stormwater discharge pipeline	NOTUS to record and provide data to SOWI SOWI for collecting data	WF

6.0 AUDIT AND REVIEW

The correct implementation of this Management Plan is verified through internal inspections and audits to be carried out according to the requirements included in section “Internal audit” of the “ESMS Manual” and in the “Audit and Non-Conformities Procedure”.

The schedule, the frequency, the scope and objectives of the audit as well as the responsible internal auditors are indicated in the Audit Program that is developed and updated by SOWI.

Internal auditing shall address:

- The correct implementation of this Management Plan
- The correct development and implementation of Contractor’s Plan
- The correct and timely implementation of an auditing and review system by the Contractor
- Each of the point indicated in the tables in section 4.0 (mitigation measures/actions) and 5.0 (monitoring activities):
- the establishment of a stakeholder engagement process related to the aspects addressed by this Management Plan.

Evidences and results of the inspection and audit activities are included in the audit reports and in the “Non-Conformity and Preventive/Corrective actions” records.

SOWI Management reviews results of inspections and audits and the progress of the Preventive/Corrective actions and takes additional appropriate actions if necessary, according to the indications included in section 7 “Management Review” of the ESMS Manual.

During steady state operations, this Management Plan will be reviewed on an annual basis and any necessary revisions made to reflect the changing circumstances, operational needs or monitoring results. Revision of this Management Plan will be the responsibility of the HSE Manager, who is in charge of this Plan.

7.0 REPORTING

This section provides instructions and requirements for the reporting related to mitigation measures/actions, to monitoring activities and to internal auditing.

7.1 Reporting of the monitoring activities

Evidences and results of the monitoring activities (detailed in section 5.0) have to be described in detail in appropriate monitoring reports. These monitoring reports must include the following minimum information/data (where relevant):

- analytical certificates from the laboratory/ies;
- localization of the monitoring activities (geographical coordinates in WGS84 system and elevation);
- timing of the data collection (start date and end date);
- description of the applied methodology;
- KPI (Key performance indicator): regulatory limit value or qualitative acceptance criteria to comply with;
- the responsibility for implementing the specific monitoring activities (including reference to this Management Plan and reference to the appointment of third parties eventually contracted to perform part of the activity (e.g. external laboratories and consultants);

- conclusions on compliance vs. KPI and eventual observations;
- quality control procedures applied to ensure consistency and reliability of the analyses or results.

7.2 Reporting of the auditing activities

The correct implementation of this Management Plan is to be verified through internal audits to be carried out according to the requirements included in the “ESMS Manual”, the internal auditing procedure and section 6.0 “Audit and review” of this Management Plan.

Evidences of the implementation of the mitigation measures/actions (detailed in section 4.0), of the timely deployment of monitoring activities (detailed in section 5.0) and of related results are described in the audit reports. These audit reports must include the following minimum information/data:

- list of the items audited (detailed in sections 4.0 and 5.0);
- information whether the items have been implemented within the indicated timeline and frequency;
- achievement (or not) of the KPIs;
- description of non-compliances eventually identified.

7.3 Self-monitoring report

Monitoring data together with the results of the audit activities will be summarized in a Self-Monitoring Report on a quarterly basis that will be provided every quarter to the Lenders and eventually to stakeholders as further described in the “ESMS Manual”.



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Bajgora Wind Project

Traffic Management Plan (TMP)

Submitted to:

SOWI Kosovo

Submitted by:

Golder Associates S.r.l.

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19122298/12275 Final

October 3rd, 2019



Acronyms

TMP Traffic Management Plan

ESMS Environmental and Social Management System

EBRD European Bank for Reconstruction and Development

IFC International Finance Corporation

KPI Key Performance Indicators

PR Performance Requirement (issued by EBRD)

PS Performance Standard (issued by IFC)

HSE Health, Safety and Environment

ESIA Environmental and Social Impact Assessment

EPC Engineering Procurement and Construction

ERP Emergency Response Plan

EU European Union

ESHS Environmental, Social Health and Safety

ESMP(s) Environmental and Social Management Plan(s)

MP Management Plan

WF Wind Farm

OHL Overhead line

GIIP Good International Industry Practice

OHS Occupational Health and Safety

BAT Best Available Technology

ISO International Organization for Standardization

Client:	SOWI (Solar & Wind) Kosovo
Project:	Wind Farm Selac 1, 2 and 3 located near the village of Bajgora in the municipality of Mitrovica, in Northern Kosovo. It includes 20 km connection powerline.
Facilities:	The project consists of 27 WTGs type GE 3.8-137 with a capacity of 3.83 MW with a hub height of 110 m and total capacity of 103.41 MW. The energy will be connected to the existing grid through an 110kV overhead line (OHL), having approximately 20 km length. The power line is considered part of the Project during its construction and will be considered an associated facility for the operation phase.
EPC Contractor:	NOTUS
Site Management:	All key managerial roles involved in the Construction Site management and in the windfarm operation, mainly referring to the SOWI personnel.

Table of Contents

- 1.0 PURPOSE AND SCOPE2**
- 2.0 ROLES AND RESPONSIBILITIES.....3**
- 3.0 BACKGROUND POLICIES AND STANDARDS.....5**
 - 3.1 National standards and regulation5
 - 3.2 International standards.....5
 - 3.3 Project limit values6
- 4.0 MITIGATION MEASURES/ACTION7**
 - 4.1 Construction8
 - 4.2 Operation.....12
- 5.0 MONITORING ACTIONS17**
 - 5.1 Construction18
 - 5.2 Operation.....22
- 6.0 AUDIT AND REVIEW.....26**
- 7.0 REPORTING26**
 - 7.1 Reporting of the monitoring activities26
 - 7.2 Reporting of the auditing activities27
 - 7.3 Self-monitoring report.....27

TABLES

- Table 1: Roles and responsibilities3
- Table 2: National standards and regulations5
- Table 3: International standards5
- Table 4: Mitigation measures/actions for construction phase8
- Table 5: Mitigation measures for operation phase12
- Table 6: Monitoring actions for construction phase18
- Table 7: Monitoring actions for operation phase22

1.0 PURPOSE AND SCOPE

This Traffic Management (TM) Management Plan identifies and presents the framework and the strategy for implementing SOWI Environmental and Social Management System (ESMS) in relation to Traffic aspects.

It has been developed in accordance with SOWI policies, with the commitments undertaken in the ESIA, with Kosovo regulatory framework, with EBRD Environmental and Social Policy and Performance Requirements PR3 and PR4, IFC Performance Standards PS3 and PS4 and IFC General and Sector Specific EHS Guidelines.

This TM MP applies to both **construction phase** and **operation phase** provides also guidelines to the contractor in charge for the Engineering Procurement and Construction (EPC) activities of the Project for addressing Environmental and Social aspects according to the standards mentioned above.

Additional details related to the operation phase of the Project are expected to come in due course; it is therefore recommended that this plan is subject to a systematic review process before start of operations in order to encompass and consider any information relevant to the TM matters.

The Purpose of this Plan is to define:

- Project standards for managing the traffic matters during the construction phase
- the scope and applicable interphases for the management of addressing traffic management and monitoring activities during the construction phase;
- define responsibilities, commitments, operating procedures and instructions for the implementation of this MP;
- the mitigation measures applicable to the Project in relation to traffic impacts;
- and manage the monitoring activities performance in relation to traffic impacts.

This MP applies to normal operating conditions during the construction and operation activities and does not specifically address any emergency situation. Emergencies are addressed in a specific Emergency Response Plan (ERP).

The overall objective of this MP is to identify the mitigation and monitoring measures in order to:

- adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimize and restore impacts to the environment;
- develop and implement policies, plans and procedures to integrate environmental and social aspects within the overall project management framework throughout its lifecycle;
- establish a monitor program to assess the effects of residual impacts on the environment;
- report the results of the periodic audits and provide for corrective actions, if necessary, in order to reach the planned objectives.

2.0 ROLES AND RESPONSIBILITIES

Principal roles and responsibilities for the implementation of this plan are in Table 1 outlined below.

Table 1: Roles and responsibilities

Role	Overall responsibilities	Specific responsibilities
Management	<ul style="list-style-type: none"> ■ Management will ensure sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of actions, measures and monitoring activities under SOWI's responsibility. ■ This will include the selection of specialized contractor(s) for specific tasks to be carried out as part of the implementation of this Management Plan such as (but not limited to) TMP management surveys, monitoring activities and data analysis and reporting; ■ designating specific personnel on site or at the administrative level, clearly define their roles and responsibilities within the environmental and social management system; 	<ul style="list-style-type: none"> ■ Final approval of this Management Plan and subcontractors' plans/procedures for the Project; ■ Taking appropriate actions to address major Non-Conformities based on audit reports, performance monitoring reports and on SOWI HSE Manager proposed approach
HSE Manager	<ul style="list-style-type: none"> ■ Ensuring that this Plan is up to date and appropriate to the nature and scale of the Project and ensuring that this Management Plan is implemented effectively; ■ Programming inspections and audit activities to ensure the correct implementation of this Management Plan; and of specialized contractor(s) tasks ■ Collecting, organizing and reviewing monitoring data and performance monitoring reports provided by the specialized contractor(s) and providing summary results of such reports to Management, to stakeholders and to the Lenders 	<ul style="list-style-type: none"> ■ Ensuring that action/measures and monitoring activities directly under SOWI responsibilities are carried out timely and adequately according to this Management Plan requirements; ■ addressing Non-Conformities through the definition of Preventive/Corrective actions proposing to Management, if necessary, amendments and/or updates to this Management Plan and issuing plan revisions; ■ bringing major Non-Conformities immediately to the attention of Management;

Role	Overall responsibilities	Specific responsibilities
EPC contractor and subcontractors	<ul style="list-style-type: none"> ■ effective execution of the specific tasks assigned in conformity with this Management Plan and with contractual arrangements; ■ respect of EHS requirements included in the ESMS; ■ agree with the timing and logistics of the monitoring activities 	<ul style="list-style-type: none"> ■ provide relevant monitoring data and monitoring reports to as indicated in this plan; ■ may propose changes and integrations to the monitoring activities included in the Management Plan; the proposed changes shall be evaluated and approved by HSE Manager and by Management.
All employees and contractors	<ul style="list-style-type: none"> ■ Comply with environmental management requirements. ■ Report any activities which are causing unnecessary biodiversity issues. 	<ul style="list-style-type: none"> ■ Give evidence that the relevant mitigation measures identified in the current TMP management plan are being properly considered, implemented and monitored during execution of the works.

3.0 BACKGROUND POLICIES AND STANDARDS

This section includes all those policies, standards and requirements of reference for this Management Plan that are applicable to the Project during the construction phase.

This section includes references

- to applicable national laws and regulations, including those laws implementing host country obligations under international law and treaties;
- to the applicable international standards i.e. those issued by:
 - EBRD Performance Requirements (May 2014) and related guidance documents and EU Regulatory framework (EU Regulations and Directives).
 - IFC Performance Standards (2012) and EHS general and sector specific EHS Guidelines.

The project is expected to achieve whichever is more stringent amongst national standards and EBRD Performance Requirements (including EU Regulatory framework). The IFC General EHS Guidelines will be applicable in the absence of applicable Kosovo and EU standards.

3.1 National standards and regulation

Table 2: National standards and regulations

Kosovo Reg. Gaz. Date
Law no. 03/I-025 on environmental protection
Law no. 03/I-043 on integrated prevention pollution control
Law no. 03/I-160 on air protection from pollution
Law no. 04/I-174 on spatial planning

3.2 International standards

Table 3: International standards

Kosovo Reg. Gaz. Date
EBRD Environmental and Social Policy and Performance Requirements (PR)
EBRD PR3: Resource Efficiency and Pollution Prevention and Control
EBRD PR4: Health and Safety
Directive 2008/50/EC
Directive 97/68/EC
IFC Performance Standards (PS) and Guidance Notes (GN)
IFC PS3 and GN3: Resource Efficiency and Pollution Prevention
IFC PS4 and GN4: Community Health, Safety, and Security

Kosovo Reg. Gaz. Date
IFC GN3: Resource Efficiency and Pollution Prevention
IFC GN4: Community Health, Safety, and Security
IFC General EHS Guidelines: § 1 Environmental
IFC General EHS Guidelines: § 3 Community Health and Safety
IFC General EHS Guidelines: § 4 Construction and Decommissioning
IFC Industry Sector EHS Guidelines: environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1
IFC Industry Sector EHS Guidelines: Electric Power Transmission and Distribution

3.3 Project limit values

The Project will entail the use of low-carbon emission vehicles. Regarding the air quality standards will be referring to the Pollution Prevention Management Plan.

According to the Impact assessment The Albania-Kosovo highway is not considered to be sensitive receptor, the Pristina-Mitrovica road is partially being constructed and partially already finished in 2016, it is one of the busiest roads of Kosovo where also heavy truck transportation. As the road is being rebuilt it can be concluded that is a good quality infrastructure and should be strong enough for the heavy trucks that will be used to deliver components needed for the construction of the wind farm. The route from Mitrovica to the Site entrances (approx. 18 km long) is used very rarely only by inhabitants, overall quality is good and is expected in most sections to meet the heavy transportation standards. However, the road presents some critical points that will have to be enlarged for the passage of special self-propelled trailers, which will be used for very long blades and tower adaptors. It is possible that during the transport of special elements such as blades, roads will have to be temporarily closed, causing disruptions in local traffic and difficulties in moving along the road and accessing villages or individual houses. Due to big length of the blades, on most of the curves of the road there will be needed to remove traffic signs, traffic lights and protective barriers or fences. Closer to the site, the curves will need to be expanded as well as additional geodetic measurements and swept path analyses will have to be made. The villages affected however are relatively small and traffic volumes are really low. In any case these situations will have to be carefully managed to reduce disruptions as much as possible.

A transport survey has been carried out by the consultant Zagreb Trans. The study describes the observed conditions of the route and explain oversize transports from the Durres harbour (Albania) to border Morine/Vermice (Albania / Kosovo) towards the future wind park of Badjgora. The Route survey does not include any studies on site but a desktop survey, in particular the route survey does not include investigations regarding bearing capacity of any bridges.

The survey concluded that the transport of components for the Project through this route will be very difficult due to the current civil engineering plans and civil road work. As pointed out in the pictures, some critical points have been identified, and the survey highlighted spots where trucks will need to modify the route, or which are eligible for management and upgrade. A trial run has to be carried out to estimate cost effective adjustments on the surveyed route. All road modification on the route must be made according GE road requirements. All costs of using private land on the route are the obligation of the investor. All costs of using state land on the route are the obligation of the GE.

4.0 MITIGATION MEASURES/ACTION

Based on the ESIA the potential impacts on environmental components deriving from Traffic MP during the construction phase are:

- e.g. increased exposure to atmospheric emission and pollutants;
- Change in the local morphology;
- Removal/degradation of soil and vegetation.

The following table details the environmental management and mitigation measures/actions identified for Traffic MP management activities during construction phase. For each measure/action identified, the table shows:

- Item: the identification code of the mitigation measure/actions (ID.);
- Measure/Actions: description of the mitigation measure/ actions;
- Source document: is the reference to one or more applicable standard (i.e. National Regulation and Permits, EBRD Performance Requirements and related EU Regulations/Directives, IFC PS/Guidelines, or other GIIP);
- Timeline and frequency: frequency/timing of the measure/action;
- KPI (Key performance indicator): quantitative compliance indicator or qualitative acceptance criteria that can be used to verify the actual effectiveness of the mitigation measure/actions;
- Responsibility: resource responsible for implementing the measures/actions;
- WF/OHL: indication whether the measure/action is applicable to the Wind Farm (WF) and/or Overhead Line (OHL)

The aim of the “mitigation hierarchy” (avoidance, minimization, rehabilitation/restoration, offset) is applied for the selection of the measures to limit as far as possible negative impacts to the environment.

This process is intended as an adaptive management system of the project, so that the mitigation and management approach will be adapted based on any new findings which could arise from the monitoring program described in the following section.

4.1 Construction

Table 4: Mitigation measures/actions for construction phase

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
TM01	<p>Avoidance:</p> <ul style="list-style-type: none"> ■ When selecting the routes to be used for the transport of materials and products, identify roads that are likely to cause the lowest impacts to local communities, terms of disruption of access and disturbance to population; ■ Avoid transport activities, particularly those involving heavy goods vehicles, during peak hours ■ Avoid of off-road vehicular traffic ■ Avoid uncontrolled discharge of stormwater from drainage network in correspondence to wind turbines emplacements and access roads; ■ Avoid uncontrolled stockpiling of excavated material. 	OHS, Environmental, H&S Trainings Environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1	During construction phase	Annual Environmental report	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL
TM02	<p>Minimization (increased exposure to land modification):</p> <ul style="list-style-type: none"> ■ Minimize the extension of land levelling and excavation areas; ■ Minimize erosion of artificial embankments and levelled areas by means of erosion control techniques and erosion protection devices; ■ Minimize the extension low permeability and impermeable areas; ■ Minimize disturbance to local water bodies caused by excavation activities and temporary discharge of stormwater from work areas; 	EBRD PR 3 IFC PS 3 Environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1 GIIP	During dry periods of construction phase	Annual Environmental report	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> ■ Minimize the extension of above ground structures in flood prone areas in the Sitnica River plain area; ■ Decommissioning activities design in order to minimize soil disturbance and clearance of vegetation, crops and grazing land; 					
TM03	<p><u>Minimization (increased exposure to atmospheric pollutants):</u></p> <ul style="list-style-type: none"> ■ Closed injection systems and low-level volatility of diesel fuel will be used ■ Minimize dust production during excavation and blasting activities. Specific dust control techniques and workers' protection measures must be implemented in these areas; ■ Dust from open area sources will be minimized by using control measures such as water spraying on the ground before vehicle passage ■ Regulation on Control of Exhaust Gas Emissions use of working machinery with low emissions and good levels of maintenance; ■ Use of diesel with low sulphur content; ■ Periodic maintenance of machinery with combustion engine; ■ In dry periods dirt roads and soil stockpiles should be sprayed with water in order to reduce dust; ■ Vehicle speed should be reduced on dirt road within and outside the site. 	EBRD PR 3 IFC PS 3 Environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1 GIIP	During dry periods of construction phase	Annual Environmental report	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL
TM04	<p><u>Minimization (drivers training)</u></p> <ul style="list-style-type: none"> ■ All drivers including personnel service drivers will be required to be licenced 	EBRD PR 5 IFC PS 5	During construction phase	Training record	NOTUS to record and provide data to SOWI	WF/OHL

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> ■ All vehicles will be licensed, and maintenance requirements will be monitored ■ All drivers will be trained regularly about traffic rules and safety. will be instructed to avoid off road driving 				SOWI for collecting data	
<p>TM05</p>	<p><u>Minimization</u> (interference with local traffic/vehicular incidents):</p> <ul style="list-style-type: none"> ■ Newly built roads should be considered in the long term only as service roads of the project, in order not to increase, trough the project itself, vehicular traffic other than the one linked to the project ■ Safety on the roads will be guaranteed by placing warning signboards in sensitive areas ■ Speed limits will be defined and applied throughout the construction routes and legal requirement will be applied for public road. ■ Visible signs, signals and flags will be placed in necessary areas and officers will be assigned to regulate the transits. Where temporary traffic signals are required (especially in the public roads), the details and locations of the signs shall be discussed with the relevant authorities. ■ The signs will be secured tightly in a way to prevent detachment or displacement and will be visible and understandable by all. The contractor will be responsible for checking the signs to clean and secure them whenever needed. ■ Off road driving will be severely prohibited 	<p>EBRD PR4 IFC PS4 Environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1</p>	<p>During construction phase</p>	<p>Record of internal regulation -</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	<p>WF/OHL</p>

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> Although secondary routes will be discouraged, whenever necessary to close out the roads, alternative routes will be planned and informed in advance to the authorities (including emergency service and public transport services) and the relevant local people (by means of public meetings to be organized prior to the construction) and proper signs will be placed. 					
TM06	<p><u>Restore:</u></p> <ul style="list-style-type: none"> Ensure that possible damages to existing roads are repaired promptly and that at the end of construction activities roads are left in original or better conditions Restoration of incipient erosion phenomena in slope areas along access road and in correspondence to wind turbines and OHL pylons In areas where reinstatement activities are planned, during land levelling and excavation works the topsoil must be properly stored on site. It will be used to rehabilitate the site back to its original state; 	EBRD PR4 IFC PS4 IFC PS5 Environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1	During construction phase	Record of internal regulation -	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/O HL
TM07	<p><u>Compensation:</u></p> <ul style="list-style-type: none"> Compensate landowner in case of land acquisition or permanent damage to agricultural or grazing land; 	EBRD PR4 IFC PS4 IFC PS5 Environmental, health, and safety guidelines	During construction phase	Record of internal regulation -	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/O HL

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
		Wind energy § 1.3.2 §1.3.6 §A.1				

4.2 Operation

Table 5: Mitigation measures for operation phase

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
TM08	<p>Avoidance:</p> <ul style="list-style-type: none"> ■ When selecting the routes to be used for the transport of materials and products, identify roads that are likely to cause the lowest impacts to local communities, terms of disruption of access and disturbance to population; ■ Avoid transport activities, particularly those involving heavy goods vehicles, during peak hours ■ Avoid of off-road vehicular traffic ■ Avoid uncontrolled discharge of stormwater from drainage network in correspondence to wind turbines emplacements and access roads; 	OHS, Environmental, H&S Trainings Environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1	During operation phase	Annual Environmental report	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/O HL
TM09	<p>Minimization (increased exposure to land modification):</p> <ul style="list-style-type: none"> ■ Minimize the extension of land levelling; 	EBRD PR 3 IFC PS 3 Environmental, health,	During operation phase	Annual Environmental report	NOTUS to record and provide data to SOWI	WF/O HL

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<ul style="list-style-type: none"> ■ Minimize erosion of artificial embankments and levelled areas by means of erosion control techniques and erosion protection devices; ■ Minimize the extension low permeability and impermeable areas; ■ Minimize disturbance to local water bodies caused by excavation activities and temporary discharge of stormwater from work areas; ■ Minimize the extension of above ground structures in flood prone areas in the Sitnica River plain area; ■ Design demolition/dismantling activities in order to minimize soil disturbance and clearance of vegetation, crops and grazing land; 	and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1 GIIP			SOWI for collecting data	
TM10	<p><u>Minimization (increased exposure to atmospheric pollutants):</u></p> <ul style="list-style-type: none"> ■ Closed injection systems and low-level volatility of diesel fuel will be used ■ Specific dust control techniques and workers' protection measures must be implemented in these areas; ■ Dust from open area sources will be minimized by using control measures such as water spraying on the ground before vehicle passage ■ Regulation on Control of Exhaust Gas Emissions use of working machinery with low emissions and good levels of maintenance; ■ use of diesel with low sulphur content; ■ periodic maintenance of machinery with combustion engine; ■ in dry periods dirt roads and soil stockpiles should be sprayed with water in order to reduce dust; ■ vehicle speed should be reduced on dirt road within and outside the site. 	EBRD PR 3 IFC PS 3 Environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1 GIIP	During operation phase	Annual Environmental report	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF/OHL
<p>TM11</p>	<p><u>Minimization (drivers training)</u></p> <ul style="list-style-type: none"> ■ All drivers including personnel service drivers will be required to be licenced ■ All vehicles will be licensed, and maintenance requirements will be monitored ■ All drivers will be trained regularly about traffic rules and safety. will be instructed to avoid off road driving 	<p>EBRD PR 5 IFC PS 5 Environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1</p>	<p>During operation phase</p>	<p>Training record</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	<p>WF/OHL</p>
<p>TM12</p>	<p><u>Minimization (interference with local traffic/vehicular incidents):</u></p> <ul style="list-style-type: none"> ■ Newly built roads should be considered in the long term only as service roads of the project, in order not to increase, through the project itself, vehicular traffic other than the one linked to the project ■ Safety on the roads will be guaranteed by placing warning signboards in sensitive areas ■ Speed limits will be defined and applied throughout the operation and legal requirement will be applied for public road. ■ Visible signs, signals and flags will be placed in necessary areas and officers will be assigned to regulate the transits. Where temporary traffic signals are required (especially in the public roads), the details and locations of the signs shall be discussed with the relevant authorities. ■ The signs will be secured tightly in a way to prevent detachment or displacement and will be visible and understandable by all. The contractor 	<p>EBRD PR4 IFC PS4 Environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1</p>	<p>During operation phase</p>	<p>Record of internal regulation -</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	<p>WF/OHL</p>

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<p>will be responsible for checking the signs to clean and secure them whenever needed.</p> <ul style="list-style-type: none"> ■ Off road driving will be severely prohibited ■ Although secondary routes will be discouraged, whenever necessary to close out the roads, alternative routes will be planned and informed in advance to the authorities (including emergency service and public transport services) and the relevant local people (by means of public meetings to be organized prior to the construction) and proper signs will be placed. 					
<p>TM13</p>	<p><u>Restore:</u></p> <ul style="list-style-type: none"> ■ Ensure that possible damages to existing roads are repaired promptly and that at the end of construction activities roads are left in original or better conditions ■ Restoration of incipient erosion phenomena in slope areas along access road and in correspondence to wind turbines and OHL pylons ■ In areas where reinstatement activities are planned, during land levelling and excavation works the topsoil must be properly stored on site. It will be used to rehabilitate the site back to its original state; 	<p>EBRD PR4 IFC PS4 IFC PS5 Environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1</p>	<p>During construction phase</p>	<p>Record of internal regulation -</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	<p>WF/OHL</p>
<p>TM14</p>	<p><u>Compensation:</u></p> <ul style="list-style-type: none"> ■ Compensate landowner in case of permanent damage to agricultural or grazing land 	<p>EBRD PR4 IFC PS4 IFC PS5</p>	<p>During construction phase</p>	<p>Record of internal regulation -</p>	<p>NOTUS to record and provide data to SOWI</p>	<p>WF/OHL</p>

Item	Mitigation Measures/Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
		Environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1			SOWI for collecting data	

5.0 MONITORING ACTIONS

The following table details the monitoring actions identified for TMP during the construction phase. The aim of the monitoring actions is to verify whether the residual impacts are under control and the mitigation measures/action have been effective.

For each monitoring measure/action identified, the table shows:

- Item: the identification code of the monitoring activity (ID.);
- Monitoring Activity: description of the monitoring activity;
- Source document: is the reference to one or more applicable standard or limit value (i.e. National Regulation and Permits, EBRD Performance Requirements and related EU Regulations/Directives, IFC PS/Guidelines, or other GIIP);
- Timeline and frequency: frequency/timing of the monitoring activity;
- KPI (Key performance indicator): regulatory limit value or qualitative acceptance criteria to comply with;
- Responsibility: resource responsible for implementing the monitoring activity;
- WF/OHL: indication whether the measure/action is applicable to the Wind Farm (WF) and/or Overhead Line (OHL)

5.1 Construction

Table 6: Monitoring actions for construction phase

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF/OHL
TM15	<ul style="list-style-type: none"> ■ Comments and/or complaints received from ongoing consultations or from grievances to improve traffic mitigations ■ Grievances on transport activities, particularly those during peak hours ■ Grievances on off-road vehicular traffic ■ Complaints on uncontrolled discharge of stormwater from drainage network in correspondence to wind turbines emplacements and access roads; 	OHS, Environmental, H&S Trainings Environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1	Monthly	Grievance Records on Project vehicles and drivers	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL
TM16	<ul style="list-style-type: none"> ■ Verification of land levelling outcomes ■ Verification of erosion of artificial embankments and levelled areas by means of erosion control techniques and erosion protection devices; ■ Verification of disposal of terrain deriving from dismantling/demolition ■ Verification of water infiltration ■ Verification of clearance of vegetation, crops and grazing land 	EBRD PR 3 IFC PS 3 Environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1 GIIP	Monthly	Annual Environmental report	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF/OHL
TM17	<ul style="list-style-type: none"> ■ Usage of injection systems and low-level volatility of diesel fuel will be used ■ Visual estimation of dust production during excavation and blasting activities. Specific dust control techniques and workers' protection measures must be implemented in these areas; ■ Usage of control measures such as water spraying on the ground before vehicle passage ■ Verification of the use of working machinery with low emissions and good levels of maintenance; ■ Use of diesel with low sulphur content; ■ Periodic maintenance of machinery with combustion engine; ■ Verification of soil stockpiles spraying with water ■ Verification of vehicle speed on dirt road within and outside the site. 	EBRD PR 3 IFC PS 3 Environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1 GIIP	Monthly	Training Records	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL
TM18	<ul style="list-style-type: none"> ■ Adoption of best transport safety practices, driving trainings, avoidance of driving performance for overtiredness, avoiding dangerous routes, adequate number of road signs, improved signage visibility ■ Pollution control, mitigation measures related to: <ul style="list-style-type: none"> ■ Air: particularly in relation to the management of community exposure to dust and other emissions generated by 	EBRD PR 5 IFC PS 5 Environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1	Monthly	Training Records	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<p>construction activities and traffic, Dust measurements, Construction Site will be wetted through controlled application of the water sprays</p>	GIIP				
TM19	<ul style="list-style-type: none"> ■ Ensure driver education monitoring and training about traffic rules and safety. ■ Verification of the avoidance of off-road driving. ■ Random verification of drivers and personnel service drivers' licences ■ Random verification of vehicles license, ■ Random verification of vehicles maintenance requirements 	<p>EBRD PR 5 IFC PS 5 Environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1</p>	Monthly	Training Records	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	WF/OHL
TM02	<ul style="list-style-type: none"> ■ Verification of speed limits ■ Visual inspection of roads signs and flags ■ Investigation of the incidents and accidents and use of lesson's learned to improve traffic mitigations. ■ Control on planned alternative routes usage 	<p>EBRD PR4 IFC PS4 Environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1</p>	Continuous	Number of accidents	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	WF/OHL

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
TM21	<p><u>Restore:</u></p> <ul style="list-style-type: none"> ■ Inspection of possible damages to existing roads ■ Implementation of road restoration with construction activities roads are left in original or better conditions ■ Restoration of incipient erosion phenomena in slope areas along access road and in correspondence to wind turbines and OHL pylons ■ Verification of the topsoil stockpiling. Control on the backfilling onto its original state; 	EBRD PR4 IFC PS4 IFC PS5 Environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1	Monthly	Number of interventions	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL
TM22	<p><u>Compensation:</u></p> <ul style="list-style-type: none"> ■ Grievances raised by landowners and compensation to the landowners affected; 	EBRD PR4 IFC PS4 IFC PS5 Environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1	Monthly	Number of grievances	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL

5.2 Operation

Table 7: Monitoring actions for operation phase

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
TM23	<ul style="list-style-type: none"> ■ Comments and/or complaints received from ongoing consultations or from grievances to improve traffic mitigations ■ Grievances on transport activities, particularly those during peak hours ■ Grievances on off-road vehicular traffic ■ Complaints on uncontrolled discharge of stormwater from drainage network in correspondence to wind turbines emplacements and access roads; 	OHS, Environmental, H&S Trainings Environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1	Monthly	Grievance Records on Project vehicles and drivers	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL
TM24	<ul style="list-style-type: none"> ■ Verification of land levelling outcomes ■ Verification of erosion of artificial embankments and levelled areas by means of erosion control techniques and erosion protection devices; ■ Verification of disposal of terrain deriving from dismantling/demolition ■ Verification of water infiltration ■ Verification of clearance of vegetation, crops and grazing land 	EBRD PR 3 IFC PS 3 Environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1 GIIP	Monthly	Annual Environmental report	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/OHL

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF/OHL
<p>TM25</p>	<ul style="list-style-type: none"> ■ Usage of injection systems and low-level volatility of diesel fuel will be used ■ Visual estimation of dust production during excavation and blasting activities. Specific dust control techniques and workers' protection measures must be implemented in these areas; ■ Usage of control measures such as water spraying on the ground before vehicle passage ■ Verification of the use of working machinery with low emissions and good levels of maintenance; ■ Use of diesel with low sulphur content; ■ Periodic maintenance of machinery with combustion engine; ■ Verification of soil stockpiles spraying with water ■ Verification of vehicle speed on dirt road within and outside the site. 	<p>EBRD PR 3 IFC PS 3 Environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1 GIIP</p>	<p>Monthly</p>	<p>Training Records</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	<p>WF/OHL</p>
<p>TM26</p>	<ul style="list-style-type: none"> ■ Adoption of best transport safety practices, driving trainings, avoidance of driving performance for overtiredness, avoiding dangerous routes, adequate number of road signs, improved signage visibility ■ Pollution control, mitigation measures related to: <ul style="list-style-type: none"> ■ Air: particularly in relation to the management of community exposure to dust and other emissions generated by 	<p>EBRD PR 5 IFC PS 5 Environmental, health, and safety guidelines Wind energy §</p>	<p>Monthly</p>	<p>Training Records</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	<p>WF/OHL</p>

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
	<p>construction activities and traffic, Dust measurements, Construction Site will be wetted through controlled application of the water sprays</p>	<p>1.3.2 §1.3.6 §A.1 GIIP</p>				
<p>TM2 7</p>	<ul style="list-style-type: none"> ■ Ensure driver education monitoring and training about traffic rules and safety. ■ Verification of the avoidance of off-road driving. ■ Random verification of drivers and personnel service drivers' licences ■ Random verification of vehicles license, ■ Random verification of vehicles maintenance requirements 	<p>EBRD PR 5 IFC PS 5 Environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1</p>	<p>Monthly</p>	<p>Training Records</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	<p>WF/OHL</p>
<p>TM2 8</p>	<ul style="list-style-type: none"> ■ Verification of speed limits ■ Visual inspection of roads signs and flags ■ Investigation of the incidents and accidents and use of lesson's learned to improve traffic mitigations ■ Control on planned alternative routes usage 	<p>EBRD PR4 IFC PS4 Environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1</p>	<p>Continuous</p>	<p>Number of accidents</p>	<p>NOTUS to record and provide data to SOWI SOWI for collecting data</p>	<p>WF/OHL</p>

Item	Monitoring Actions	Source document	Timeline and frequency	KPI	Responsibilities	WF OHL
TM2 9	<p><u>Restore:</u></p> <ul style="list-style-type: none"> ■ Inspection of possible damages to existing roads ■ Implementation of road restoration with construction activities roads are left in original or better conditions ■ Restoration of incipient erosion phenomena in slope areas along access road and in correspondence to wind turbines and OHL pylons ■ Verification of the topsoil stockpiling. Control on the backfilling onto its original state; 	EBRD PR4 IFC PS4 IFC PS5 Environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1	Monthly	Number of interventions	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/ OHL
TM3 0	<p><u>Compensation:</u></p> <p>Grievances raised by landowners and compensation to the landowners affected;</p>	EBRD PR4 IFC PS4 IFC PS5 Environmental, health, and safety guidelines Wind energy § 1.3.2 §1.3.6 §A.1	Monthly	Number of grievances	NOTUS to record and provide data to SOWI SOWI for collecting data	WF/ OHL

6.0 AUDIT AND REVIEW

The correct implementation of this Management Plan is verified through internal inspections and audits to be carried out according to the requirements included in section “Internal audit” of the “ESMS Manual” and in the “Audit and Non-Conformities Procedure”.

The schedule, the frequency, the scope and objectives of the audit as well as the responsible internal auditors are indicated in the Audit Program that is developed and updated by SOWI.

Internal auditing shall address:

- The correct implementation of this Management Plan
- The correct development and implementation of Contractor’s Plan
- The correct and timely implementation of an auditing and review system by the Contractor
- Each of the point indicated in the tables in section 4.0 (mitigation measures/actions) and 5.0 (monitoring activities) of this plan and in particular:
- the establishment of a stakeholder engagement process related to the aspects addressed by this Management Plan.

Internal inspections frequency has to be increased when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions.

Evidences and results of the inspection and audit activities are included in the audit reports and in the “Non-Conformity and Preventive/Corrective actions” records.

SOWI Management reviews results of inspections and audits and the progress of the Preventive/Corrective actions and takes additional appropriate actions if necessary, according to the indications included in section 7 “Management Review” of the ESMS Manual.

During steady state operations, this Management Plan will be reviewed on an annual basis and any necessary revisions made to reflect the changing circumstances, operational needs or monitoring results. Revision of this Management Plan will be the responsibility of the HSE Manager, who is in charge of this Plan.

7.0 REPORTING

This section provides instructions and requirements for the reporting related to mitigation measures/actions, to monitoring activities and to internal auditing.

7.1 Reporting of the monitoring activities

Evidences and results of the monitoring activities (detailed in section 5.0) have to be described in detail in appropriate monitoring reports. These monitoring reports must include the following minimum information/data (where relevant):

- analytical certificates from the laboratory/ies;
- localization of the monitoring activities (geographical coordinates in WGS84 system and elevation);
- timing of the data collection (start date and end date);
- description of the applied methodology;
- KPI (Key performance indicator): regulatory limit value or qualitative acceptance criteria to comply with;

- the responsibility for implementing the specific monitoring activities (including reference to this Management Plan and reference to the appointment of third parties eventually contracted to perform part of the activity (e.g. external laboratories and consultants);
- conclusions on compliance vs. KPI and eventual observations;
- quality control procedures applied to ensure consistency and reliability of the analyses or results.

7.2 Reporting of the auditing activities

The correct implementation of this Management Plan is to be verified through internal audits to be carried out according to the requirements included in the “ESMS Manual”, the internal auditing procedure and section 6.0 “Audit and review” of this Management Plan.

Evidences of the implementation of the mitigation measures/actions (detailed in section 4.0), of the timely deployment of monitoring activities (detailed in section 5.0) and of related results are described in the audit reports. These audit reports must include the following minimum information/data:

- list of the items audited (detailed in sections 4.0 and 5.0);
- information whether the items have been implemented within the indicated timeline and frequency;
- achievement (or not) of the KPIs;
- description of non-compliances eventually identified.

7.3 Self-monitoring report

Monitoring data together with the results of the audit activities will be summarized in a Self-Monitoring Report on a quarterly basis that will be provided every quarter to the Lenders and eventually to stakeholders as further described in the “ESMS Manual”.



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