

Environmental and Social Action Plan

400kV Transmission Line, SS Bitola 2 – Macedonian/Albanian border and SS Ohrid

The European Bank for Reconstruction and Development (EBRD) is considering providing financing to Macedonian Transmission System Operator (MEPSO) for the design, construction, and operation of a 400kV overhead transmission line from Bitola to the Macedonian / Albanian border and SS Ohrid. The project includes the following elements:

- Design, construction, and operation of a new 400/110kV substation in the Ohrid area.
- The diversion of an existing 110 kV overhead line Bitola-Resen-Ohrid-Struga into the new Ohrid substation.
- Upgrade of an existing substation in Bitola.
- Design, construction, and operation of a new 400kV overhead transmission line from Bitola to the Macedonian / Albanian border west of Lake Ohrid.

MEPSO has prepared and disclosed an Environmental and Social Impact Assessment (ESIA) to meet the requirements of Macedonian law. This ESIA described the project and the natural and social resources that could be affected, and evaluated the potential impacts the project could have on those resources. The ESIA also describes a series of actions that will need to be taken to prevent, control, or otherwise mitigate potential impacts. Those requirements are described in this Environmental and Social Action Plan (ESAP), which will be part of the financing agreement between EBRD and MEPSO. The performance of the required actions will be reported to EBRD by MEPSO and will be audited or otherwise evaluated by EBRD during construction and operation of the project.

The table below constitutes the ESAP. It identifies the actions required, the basis of the requirement, the responsible entity, the timing of the action, and the criteria to be used for determining whether the goal of the action has been successfully achieved. Implementation of all the actions is the ultimate responsibility of MEPSO. When other companies perform work under contract, MEPSO will be responsible for their compliance with the requirements of the ESAP, even if direct oversight is by a contractor. This is expected to be accomplished by inclusion of requirements in contracts and subcontracts, and by direct oversight and supervision by MEPSO and/or its oversight contractor.

As agreed by EBRD and MEPSO, this ESAP may be revised from time to time during project performance. No changes will allow violations of Macedonian law or of EBRD requirements for environmental and social performance.

The ESAP therefore supplements the requirements of National law to ensure compliance with best practice and the Lenders requirements.

Environmental and Social Action Plan 400 kV Transmission Line SS Bitola – Macedonian / Albanian border and SS Ohrid				
<i>No.</i>	<i>Action</i>	<i>Source of requirement</i>	<i>Timetable / Project Phase</i>	<i>Target and Evaluation Criteria For Successful Implementation¹</i>
0	Submit regular reports to the EBRD on environmental, social, health and safety performance, including compliance with each ESAP requirement and EBRD Performance Requirements.	EBRD PR 1	- Each six months during construction - Annually during operation	Submission of reports to EBRD on schedule and in a mutually agreed format, with agreed supporting documentation
0.1	Company will implement the current corporate EHS management systems on this project, aligned with the requirements of the ISO 14001 and OHSAS 18001 standards.	EBRD PR 1 Best practice	- Implement corporate EHS management system to the project.	EHS management systems to be implemented in line with ISO 14001 and OHSAS 18001 certification standards and corporate EHS management
0.2	MEPSO will further develop and implement a Corporate Social Responsibility (CSR) Program with first reporting in 2017.	Best practice		CSR report in line with GRI Standard at the corporate level by 2017 if not before.
<i>PR 1. Assessment and Management of Environmental and Social Risks and Impacts</i>				
1.1	MEPSO and/or contractor to apply for, receive, and comply with all necessary permits and conditions. Maintain valid permits issued by Competent Authorities	Macedonian law EBRD PR 1	Prior to undertaking activities that require permits and permissions. Maintain a permit register	- Permits and permissions in place - Contractor permits verified by MEPSO - Project in compliance <i>Report to EBRD</i> - Report compliance status - Report immediately any material noncompliance/violation
1.3	Include relevant design and construction requirements from ESAP and ESMMP/ESIA into tenders and contracts,	EBRD PR 1 Best practice	- Upon entry into contracts/ subcontracts	- MEPSO approval of contractor E&S organizations/staffing

¹ Unless otherwise noted, “report to EBRD” refers to inclusion of required information in the ESHS reports required under item 0 of this ESAP.

Environmental and Social Action Plan 400 kV Transmission Line SS Bitola – Macedonian / Albanian border and SS Ohrid				
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	including: - Contractor ESMS - Staff/management E&S training - Assignment of clear responsibilities within contractors' organizations for E&S issues, with clear reporting lines to management and MEPSO - Reports on performance sufficient to allow MEPSO to evaluate project/contractor performance and to design corrective actions as necessary, as well as to include all relevant data in MEPSO reports to the EBRD - Provide access to a grievance mechanism for the contractors' workers, identical or equivalent to what is required for MEPSO employees under requirement 2.4.		- Reporting: throughout contractor performance	- Staff and managers trained - MEPSO reports include contractor data <i>Report to EBRD</i> - Report summary of training - Grievance mechanism available to contractor employees - Report relevant contractor performance data
1.5	Appoint an independent Environmental, Health and safety, and Social (EHSS) consultancy to monitor contractor implementation of ESAP, ESIA ESMMP, and good international industry practice. Reports to include recommendations for corrective actions and improvements as needed.	EBRD PR 1 Best practice	- Appoint: prior to first disbursement - Monitor: quarterly during construction	- TOR reviewed/approved by EBRD - Consultancy appointed with a non objection sign off from EBRD - Monitoring conducted and reported <i>Report to EBRD</i> - Monitoring reports submitted to EBRD with EHSS reports - Major issues reported to EBRD immediately
1.6	Include clauses within the Contractors Agreement that requires compliance with EU requirements especially in relation to supply chain management, health and safety and environmental standards	EBRD PRs, EU, ILO	Ongoing from commencement of construction for the duration of the loan	- Evidence of international environmental, health, safety and social contractual obligations within contracts with contractors

Environmental and Social Action Plan 400 kV Transmission Line SS Bitola – Macedonian / Albanian border and SS Ohrid				
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1.7	Appoint an employee with the appropriate skills and qualifications to be responsible for community liaison, development of detailed land acquisition plans, the implementation of the SEP, and management of other social matters.	EBRD PR 1 EBRD PR 10	Prior to financial close	- Appointment of appropriate personnel
1.8	Implement mitigation measures in the ESIA, including the ESMMP in Chapter 11 and any permit conditions included in Permits, as approved by Competent Authorities.	Macedonian law EBRD PR 1	Throughout design, construction, and operation	- Mitigation measures implemented by contractors and MEPSO, as appropriate - Minimal adverse impacts <i>Report to EBRD</i> - Status of mitigation implementation
1.9	Disclosure of updated environmental and social impact information on the key preferred location for the Ohrid Substation.	EBRD PR 1 EU EIA Directive	Following finalisation of detailed designs and prior to construction commencement.	- Cover key information for disclosure to supplement the ESIA information, regarding the final location of the Ohrid substation.
<i>PR 2. Labour and Working Conditions</i>				
2.1	Support local labour force and economy by: - Providing realistic information on employment opportunities - Encouraging contractors to maximize local hiring and local materials sourcing - Providing opportunities for local firms to subcontract supplies and services where possible.	Macedonian law EBRD PR 2 Best Practice	Prior to workforce selection	- Local announcements when hiring - Contractor reporting to MEPSO on local hiring and sourcing <i>Report to EBRD</i> - Summary of project hiring, including local hiring and local sourcing
2.2	Continue to implement the practices that allow MEPSO	EBRD PR 2	- Continue implementation	- Implement practices, including

Environmental and Social Action Plan 400 kV Transmission Line SS Bitola – Macedonian / Albanian border and SS Ohrid				
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	employees to have grievances addressed and monitor contractor grievance mechanism(s). <i>(Note: this is separate from the stakeholder grievance mechanism required under EBRD PR 10)</i>		of MEPSO practices: throughout project performance - Monitor contractor grievances: throughout contractor performance	timely resolution of all grievances <i>Report to EBRD</i> - Significant changes in practices/mechanism - Summary of grievances and resolutions
2.3	Supply chain risk assessment for low labour cost supply items potentially involving child or forced labour practices ; if any such risks are identified, conduct targeted audits	EBRD PR2	Risk assessment prior to construction; first audit in the first quarter of construction	- Supply chain risk assessment completed and provided to Bank; audits completed and provided to the Bank
2.4	Document the Project company's labour accommodation strategy and principles. Check existing and proposed accommodation against the strategy and update any plans as needed. Require a written Code of Conduct for any labour accommodation.	Macedonian law EBRD PR 2 Best Practice	If housing provided: quarterly inspections and reports	- Worker housing compliant with EBRD PR 2 and GIIP <i>Report to EBRD</i> - Status of housing, major findings of MEPSO oversight
2.5	Contractors to develop human resources policies according to Macedonian legislation and EBRD requirements focusing on provisions against child and forced labour, non-discrimination and equal opportunities and supply chain management. Wages, benefits and working conditions, training and management of security personal and worker accommodation shall be in line with Macedonian legislation and EBRD's PR 2.	EBRD PR2 National legislation	Prior to contracting	Human resources policies submitted for compliance check
<i>PR 3: Resource Efficiency and Pollution Prevention and Control</i>				
3.1	Contractor to prevent nuisance dust and other air emis-	Macedonian law	- MEPSO review/approval:	- MEPSO review/approval

Environmental and Social Action Plan 400 kV Transmission Line SS Bitola – Macedonian / Albanian border and SS Ohrid				
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	sions, to include (as required by ESIA/ESMMP): - Water roads and bare ground in dry periods - Strictly enforce of speed limits on unpaved areas - Maintain machinery and equipment - Cover dusty loads - Timely (immediate) land restoration MEPSO to review and approve contractor's plans and practices	EBRD PR 3 Best practice	prior to construction - Contractor to implement: throughout construction	- Adherence to ESIA/ESMMP/GIIP for dust and emissions - No nuisance dust or other emissions <i>Report to EBRD</i> - Incidents involving nuisance dust
3.2	Contractor to prevent impacts on water, to include (as required by ESIA/ESMMP): - Avoid water protection/management zones as defined in ESIA - Strict erosion control measures to prevent run-off - Spill and leak cleanup materials/equipment in all vehicles and machines - Regular maintenance of all machinery to prevent engine oil and fuel leaks - Portable toilets - No crossing of watercourses by vehicles and machinery - Minimize works near rivers in wet weather - Timely (immediate) site restoration/re-vegetation after construction completed - No towers within 10 meters of water bodies. MEPSO to review and approve plans and practices	Macedonian law EBRD PR 3 Best practice	- MEPSO review/approval: prior to construction - Contractor to implement: throughout construction	- MEPSO review/approval - Adherence to ESIA/ESMMP/GIIP for water protection - No disruption of aquatic habitats <i>Report to EBRD</i> - Incidents involving water contamination
3.3	Contractor(s) to develop and implement erosion control and site restoration plan for all construction activities, to include: - Minimize use of land-clearing equipment; hand tools	EBRD PR 3 Best practice	- Develop prior to construction - Implement during construction	- Plan reviewed and approved by MEPSO, implemented by contractor - Implementation of best practice

Environmental and Social Action Plan 400 kV Transmission Line SS Bitola – Macedonian / Albanian border and SS Ohrid				
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	<p>used where feasible.</p> <ul style="list-style-type: none"> - Salvage and store topsoil and subsoil for use in restoration - Use good drainage control practices (grading, berms, silt fences, hay bales, etc.) at tower locations and temporary roads to control and minimize run-off and erosion until site is fully restored - Install drainage controls on (non-temporary) roads on hills and steep slopes to ensure permanent stability - Restore sites immediately upon completion of construction (do not wait until all towers are complete): regrade as needed, cover with soil, revegetate with seeds or small plants of native species. - Monitor sites until vegetation is self-sustaining for at least one full growing season, repair as needed 			<p>erosion control and site restoration</p> <p><i>Report to EBRD</i></p> <ul style="list-style-type: none"> - Status of plan development and MEPSO approval - Highlights of erosion control - Summary of site restoration activities and monitoring
3.4	<p>Contractor to develop and implement hazardous materials and waste management plan, which is to guide management of all materials and waste types (paints, fuel, oils, etc.) to be managed during construction. MEPSO to verify that off-site management is by licensed companies and in licensed places. MEPSO to review and approve plan.</p>	<p>Macedonian law EBRD PR 3</p>	<ul style="list-style-type: none"> - Plan developed by contractor and reviewed and approved by MEPSO: prior to start of construction - Construction plan implemented by contractor and overseen by MEPSO: throughout construction 	<ul style="list-style-type: none"> - Contractor plan reviewed and/or approved by MEPSO, and if required by authorities - Materials managed as required <p><i>Report to EBRD</i></p> <ul style="list-style-type: none"> - Status of contractor plan development and approval - Highlights of materials and waste management (amounts, types, management methods, etc.) - Report immediately any major releases or incidents

Environmental and Social Action Plan 400 kV Transmission Line SS Bitola – Macedonian / Albanian border and SS Ohrid				
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3.5	MEPSO to develop and implement a hazardous materials and waste management plan to include management of transformer oils, paints, fuels, and other materials. Plan to require impermeable containment below transformers with capacity sufficient for at least 1.1 times oil volume (plus expected precipitation [if outdoors]).	Macedonian EBRD PR 3	- Plan developed prior to commissioning - Plan implemented throughout operation	- Plan developed and (if required) reviewed by authorities - Materials managed as required with no releases <i>Report to EBRD</i> - Status of plan development - Report immediately any major releases or incidents
3.6	MEPSO to identify Groundwater supplies along the OHL route and new substation location. Identify source sensitivity and reassess if any further mitigation is required in any sensitive areas.	EBRD PR 3 EU EIA Directive	Prior to finalisation of detailed design.	- Information in place on groundwater sources and sensitivity.
<i>PR 4. Health and Safety</i>				
4.1	Contractors to develop and implement Occupational Health and Safety (OHS) plans and programs to guide all activities on project sites during site preparation and construction. MEPSO to review and approve plans, which are to include (but not be limited to): - Job- and task-specific hazard analysis and controls for all jobs/activities - Provision of personal protection equipment (PPE), requirements for use of PPE, and enforcement of PPE use - Provision of other safety equipment as needed - Safety training for all personnel in their language(s), covering hazards and safety protocols of their jobs - Special training for hazardous situations, including confined spaces, working at heights, working in traffic,	Macedonian law EBRD PR 4 Best Practice	- Contractor plans approved by MEPSO: prior to contractor mobilization - Plans implemented: throughout performance	- Contractor plans reviewed & approved by MEPSO - Contractor implementation verified and monitored by MEPSO - Training confirmed by MEPSO - Reports received by MEPSO <i>Report to EBRD</i> - Report to EBRD on OHS issues, including incident and enforcement statistics, status of training, etc. - Report summary of MEPSO oversight activities - Report to cover MEPSO and con-

Environmental and Social Action Plan 400 kV Transmission Line SS Bitola – Macedonian / Albanian border and SS Ohrid				
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	working with electricity, etc. - Recording and reporting to MEPSO incident statistics, including (at a minimum) total work hours, lost time incidents, major injuries, fatalities, etc.			tractor workforces - Report to EBRD immediately in case of major accidents and/or fatalities
4.2	Limit public exposure to electric and magnetic fields, including: - Contractor to ensure towers and corridor are beyond the ESIA-required required buffer zones/clearances for houses/properties - MEPSO to measure EMF at houses/buildings within 150m of OHL and apply appropriate mitigation if needed to reduce potential exposure	Macedonian law / EBRD PR 4 / Best Practice	- Tower and corridor location: design stage - EMF measurements: if requested by nearby resident - EMF mitigation: if needed to meet international standards	- Public exposure to the EMF meets international standards - EMF measured and mitigated if needed <i>Report to EBRD</i> - Results of any EMF measurements - Any mitigation measures implemented
4.3	Develop and implement procedures to protect public health and safety, to include (but not be limited to): - Contractor to provide security as needed to prevent unauthorized access to project locations - MEPSO to provide security as needed for new Ohrid substation - Contractor to consult with local authorities and nearby residents before major activities and traffic - Contractor to raise awareness of risks and gather feedback from communities about potential, real and perceived health and safety impacts - All energized components to be posted with hazard notices/signs/barriers to prevent access - All signs in Macedonian(and according the Law for us-	EBRD PR 4 Best practice	- Develop prior to construction - Implement: during construction and operation	- MEPSO to review and approve contractor security procedures/practices - No safety incidents <i>Report to EBRD</i> - Details of incidents involving risks/impacts to members of the public - Immediate notice if member of the public is seriously injured or killed

Environmental and Social Action Plan 400 kV Transmission Line SS Bitola – Macedonian / Albanian border and SS Ohrid				
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	ing local languages) with international symbols			
4.4	<p>MEPSO to review and approve contractor traffic management plan, to include:</p> <ul style="list-style-type: none"> - Route planning to minimize public disruption during transport of project materials, including transformers and tower components - Minimum requirements for drivers and equipment operators, and enforcement of rules (age, licensing, training, etc.) - Speed limits - Vehicle management and maintenance - Consultation with local authorities before heavy use of specific routes 	EBRD PR 4 / Best practice	<ul style="list-style-type: none"> - MEPSO review/approval: prior to contractor mobilization - Contractor to implement: throughout construction 	<ul style="list-style-type: none"> - MEPSO review and approval of contractor plans - Contractor implements plan - No serious incidents <p><i>Report to EBRD</i></p> <ul style="list-style-type: none"> - Report status of plan approval - Report summary of minor traffic incidents - Report immediately any serious accident that causes property damage or injuries
4.5	<p>MEPSO or (as required by MEPSO) design contractor to establish baseline noise levels at residences and other sensitive locations within 500m of corridor. Construction contractor to use good construction practice to prevent off-site nuisance from construction noise. Construction contractor and/or MEPSO to monitor noise upon request from resident and implement mitigation measures as needed to meet standards.</p>	Macedonian law EBRD PR 4 Best practice	<ul style="list-style-type: none"> - Establish baseline noise: before construction begins - Control noise: throughout construction - Monitor and mitigate: as needed 	<ul style="list-style-type: none"> - Noise baseline established at sensitive locations - No noise complaints <p><i>Report to EBRD</i></p> <ul style="list-style-type: none"> - Report if any noise measurements exceed standards - Report any mitigation needed
4.6	<p>MEPSO to implement measures to control operation noise:</p> <ul style="list-style-type: none"> - Establish noise baseline at nearest residence and at locations within 500m from Ohrid substation - Appropriate corona testing - Engineering measures (e.g., rubber footings) to sup- 	Macedonian law EBRD PR 4 Best practice	<ul style="list-style-type: none"> - Establish baseline noise: prior to substation operation - Control noise: throughout operation - Corona testing: in case of 	<ul style="list-style-type: none"> - Noise baseline established at locations near substation - No noise complaints <p><i>Report to EBRD</i></p> <ul style="list-style-type: none"> - Report if any noise measurements exceed standards

Environmental and Social Action Plan 400 kV Transmission Line SS Bitola – Macedonian / Albanian border and SS Ohrid				
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	press operational noise at substations - On-demand monitoring in case of complaint or request by resident or other affected person, implementation of mitigation if noise exceeds standards		complaints - Measurements and mitigation during operation: if requested and if needed	- Report any mitigation needed
4.7	Ensure that the detailed design contractor takes account of the Seismic information across the project area, in particular in relation to tower foundation design.	EBRD PR4 – Community Safety	- Part of completion of project detailed design	- Seismic design statement and integration of requirements into engineering design
<i>PR 5. Land Acquisition, Involuntary Resettlement, and Economic Displacement</i>				
5.1	MEPSO to require design contractor to favour state-owned land over privately owned land for roads, tower locations, and corridor right-of-way. This will require cadastral work prior to initial selection of tower locations.	EBRD PR 5	Public lands favoured: during tower/corridor surveys	- Requirements in contract - Cadastral work done prior to tower location selection <i>EBRD to report:</i> - Details of state vs private land to be acquired
5.2	MEPSO to require design contractor to schedule surveys for tower locations in order to survey those on private lands before those on state lands so the census and land valuation and acquisition process can proceed as early in the process as possible.	EBRD PR 5	- Survey schedule approved by MEPSO: before surveys begin	- Private lands surveyed before state lands <i>Report to EBRD</i> - Status of location selection (private vs state land tower locations, roads, corridor length)
5.3	MEPSO to appoint qualified consultant to develop a Land Acquisition and Compensation Plan (LACP), based on the existing Land Acquisition Framework, to ensure land acquisition and compensation meet Macedonian and EBRD requirements, and to monitor the land acquisition process.	Macedonian law EBRD PR 5	- Consultant appointed: before tower locations are selected - LACP fully developed and disclosed for consultation	- Consultant approved by EBRD - LACP developed and approved by MEPSO and EBRD - All land acquisition and compensation in accordance with LACP

Environmental and Social Action Plan 400 kV Transmission Line SS Bitola – Macedonian / Albanian border and SS Ohrid				
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	sition and compensation process to verify it meets the requirements of the LACP. Consultant could also be involved in early cadastral work to identify line sections on private vs state lands so design contractor can prioritize surveys under requirement 5.2 and select locations under 5.1. The LACP will also identify any vulnerable individuals and groups who will need additional mitigation and compensation measures.		tion: before establishing land/ property value and beginning land acquisition/ compensation - Consultant monitoring plan implementation: after approval of the Plan by EBRD	<i>Report to EBRD</i> - Status of LACP development and implementation - Summary of land acquisition and compensation
5.4	If one or more households need to be physically relocated, MEPSO, the consultant appointed under 5.3. to ensure coverage of additional requirements for resettlement action planning and monitoring in the overall LACP.	EBRD PR 5	Consultant appointed as per 5.3 above	- Consultant approved by EBRD - RAP incorporated in LACP and approved by MEPSO and EBRD - Resettlement in accordance with LACP <i>Report to EBRD</i> - Status of LACP development and implementation - Summary of resettlement progress
5.5	Appoint a person to be the primary point of contact within MEPSO regarding the land acquisition and compensation program. (<i>Note: could be consultant under 5.3/5.4 or the point of contact for all stakeholder engagement under SEP and under 1.7</i>)	EBRD PR 5	Appointment: prior to and throughout implementation of LACP	- Person appointed and in place throughout land acquisition <i>Report to EBRD</i> - Status of appointment - Highlights of engagement with affected people
5.6	Audit of on-going land acquisition and compensation process against the LACP conducted by the IESC ap-	EBRD PR 5	- Bi-annual audit of land acquisition activities	- Audit submitted to the Bank - Completion audit submitted to

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	pointed as per 1.5 above. Implement gap filling actions, including making retrospective payments where needed.		-	the Bank
5.7	At completion of land acquisition and compensation, IESC to audit the completed program. <i>(Note: may not be the same consultant who monitors LACP implementation as under 5.3)</i>	EBRD PR 5	- Appointment of IESC as per 1.5 above: Completion audit at appropriate time as per the LACP, when livelihood restoration is likely to have been achieved	- IESC retained as per 1.5 above - Audit completed - Final land acquisition and compensation in accordance with LACP <i>Report to EBRD</i> - Status of LACP implementation - Completion audit results and summary report
<i>PR 6. Biodiversity conservation and sustainable management of living natural resources</i>				
6.1	Appoint qualified biodiversity experts (flora and fauna) to undertake pre-construction bio-surveys along the corridor prior to final selection of corridor and tower locations. Surveys will need to: - Assist in micro-locating towers in order to avoid adverse impacts on protected plants and fauna, and recommend mitigation for all impacts on biodiversity. - Identify locations where construction should not take place at specific times of the year to avoid adverse impacts on protected flora and fauna. - Identify locations where additional seasonal survey(s) must be conducted to verify recommendations on micro-locations (e.g., in spring to identify specific plants or breeding birds), and then conduct the surveys and	EBRD PR 6	Appoint experts: prior to final selection of corridor and tower locations - Conduct surveys: concurrent with or as soon after design contractor surveys as possible, and again in other season(s) as needed - Prepare recommendations and summary report: recommendations at completion of individual surveys, report at	- Expert appointed by Consultant/Designer and approved by MEPSO/EBRD to be informed - Experts appointed and approved by MEPSO/EBRD to be informed - Surveys completed - Towers located so as to minimize impact on biodiversity - Report prepared <i>Report to EBRD</i> - Status of expert selection and appointment - Summary of survey results - Summary report(s)

Environmental and Social Action Plan 400 kV Transmission Line SS Bitola – Macedonian / Albanian border and SS Ohrid				
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	advise on further micro-location. - Identify potential or actual bat roosts and either micro-locate project elements to avoid damage or establish construction schedules to avoid undue disturbance at key periods - Identify areas where additional bird and bat surveys should be undertaken in order to identify areas where additional mitigation is needed (bird diverters, nesting platforms, bat boxes, etc.). - Identify areas of critical habitat as defined in PR 6 and design compensation/offsets if impacts cannot be avoided - At completion of surveys, prepare summary report on details of mitigation and residual impacts, with recommendations for any additional work that may be needed.		conclusion of major survey efforts	
6.2	Consult with relevant authorities to develop compensation plan for loss of state forests. Replant with the valued and lost / native species wherever possible.	Macedonian law EBRD PR 6	- Consultations: prior to cutting trees - Compensation: as agreed with authorities	- Compensation plan approved by authorities <i>Report to EBRD</i> - Results of consultations and status of compensation measures
6.3	As recommended by experts under 6.1 and agreed with authorities, install bird diverters on identified sections of the line to reduce risk of collision.	EBRD PR 6 Best practice	- Install: during construction or as needed	- Install diverters as recommended/agreed <i>Report to EBRD</i> - Report status of bird diverter installation
6.4	Based on recommendations of ornithologists under 6.1,	EBRD PR 6	- Develop programme: pri-	- Development of programme

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	develop and implement a programme to monitor bird mortality in specific locations, and implement additional mitigation to reduce mortality if needed.	Best practice	or to completion of construction - Implement: throughout operation until authorities allow cessation	- Implementation of programme - Review of results by authorities - Further bird protection measures as needed <i>Report to EBRD</i> - Status of program development - Summary of mortality monitoring, list of mitigations
6.5	MEPSO and/or contractor to appoint qualified person to oversee all construction in sensitive areas to ensure adherence to ESAP and ESMMP. Areas to include, at a minimum, Lake Ohrid UNESCO Biosphere Reserve area, Crn Drum near Struga, River Sateska near village Volina, and Pelagonia area.	EBRD PR 6	- Appoint: prior to construction - Oversee construction: throughout construction	- Qualified person appointed - 100% oversight - Adherence to ESAP & ESMMP <i>Report to EBRD</i> - CV of appointed person - Confirmation of oversight - Significant deviations from ESAP/ESMMP
<i>PR 8. Cultural Heritage</i>				
8.1	Develop and implement a chance find procedure, ensure this is included in the requirement of the construction contract, and ensure all contractors and other relevant parties are trained in its use. Develop a brief Cultural Heritage Management Plan (CHMP) for the Project . This should have a particular focus on the assets located within the UNESCO Ohrid Natural and Cultural Heritage Area. The CHMP may be brief and contain information on the cultural heritage	Macedonian Law/ EBRD PR8	- Develop procedure prior to construction. - Implement during the construction. Develop the brief CHMP prior to final fix of the detailed design.	- Report to authorities and EBRD in case of finds. - Maintain the brief CHMP during construction. Keep documented records of the engagement with the local expert stakeholders to validate the sensitive heritage lo-

Environmental and Social Action Plan 400 kV Transmission Line SS Bitola – Macedonian / Albanian border and SS Ohrid				
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	<p>locations including the mapped locations from the UNESCO designation so that the detailed design can take account of the need to avoid these locations.</p> <p>Undertake stakeholder engagement with specialists from within the Ohrid region, such as UNESCO and the Museum in Ohrid town, to ensure that the sensitive areas identified are accurate.</p> <p>Sensitive locations should be avoided. Construction adjacent to, or near to sensitive heritage locations should only be undertaken under the supervision of a local qualified specialist (eg archaeologist or similar expert), who is given the authority to stop work if needed.</p>			locations within the CHMP.
PR 10. Information Disclosure and Stakeholder Engagement				
10.1	<p>Implement Stakeholder Engagement Plan (SEP), including immediate stakeholder engagement and stakeholder grievance mechanism. As part of the SEP maintain a register of external communications including minutes of meetings held with stakeholders.</p> <p>Update the SEP</p>	EBRD PR 10 Best practice	During detailed design phase, construction and implementation	<p>- Two-way communications maintained with stakeholders and documented</p> <p><i>Report to EBRD</i></p> <p>- Highlights of stakeholder engagement</p> <p>- Summary of grievances and resolutions</p>
10.2	Disclose an updated NTS and the LACP once the detailed design has determined the routing of the TL, and carry out additional public consultation meetings with directly	EBRD PR10 Best practice	Following finalisation of detailed designs and prior to construction	- Disclosure of updated NTS and LACP with links provided to the Lenders

Environmental and Social Action Plan 400 kV Transmission Line SS Bitola – Macedonian / Albanian border and SS Ohrid				
<i>No.</i>	<i>Action</i>	<i>Source of requirement</i>	<i>Timetable / Project Phase</i>	<i>Target and Evaluation Criteria For Successful Implementation¹</i>
	<p>affected people.</p> <p>Publish any changes on interest and allow for public consultations</p>			<ul style="list-style-type: none"> - Consultation meetings held <i>Report to EBRD on outcomes</i> - Provide updated NTS and LACP prior to disclosure - Summary report of consultation meetings
10.3	<p>Contact or undertake detailed design review and disclose information in line with International best practice, SEP and national legislation.</p> <p>For any material project change, develop an ESIA supplementary package in line with EBRD requirements and ensure adequate public consultations</p>	<p>EBRD PR 1 and PR10</p> <p>National legislation</p> <p>Best practice</p>	<p>As part of detailed assessment</p> <p>For any material change</p>	<ul style="list-style-type: none"> - As appropriate disclosure of updated NTS and ESIA disclosure package or/and supplementary documents. - Consultation meetings held <i>Report to EBRD</i> - Provide updated NTS and LACP prior to disclosure - Summary report of consultation meetings