



Environmental and Social Action Plan

for Developer Alibunar Windfarm A d.o.o.
for the

Alibunar A Wind Project

in the Alibunar Municipality,
Autonomous Province of Vojvodina,
Serbia



View from Seleuš



View from Vladimirovac

**Future Views
of Alibunar A
and B Wind
Projects**

April 2015

Alibunar A Wind Project Environmental and Social Action Plan

WindVision Operations d.o.o. and WindVision Alibunar Windfarm A d.o.o. (individually and collectively, “WindVision”) are planning to construct and operate the Alibunar A Wind Power Plant (also known as Alibunar 1) about 50 kilometres northeast of Belgrade, Serbia, in the municipality of Alibunar, Autonomous Province of Vojvodina. The Project includes about 45 kilometres of improved access and site roads, construction of 33 foundations and turbines, construction of an on-site substation, burial of cables to convey electricity from turbines to the substation, and construction of an 11.8-kilometer 220kV transmission line to convey electricity from the substation to the national grid. Project financing is being provided by the European Bank for Reconstruction and Development (EBRD) and the European Investment Bank (the “Lenders”). The Alibunar A project is part of a larger development that will ultimately include at least another 25 turbines upon completion of Alibunar B (also known as Alibunar 2), and possibly more in the future.

WindVision will need to implement a number of actions to ensure and verify that the Project is constructed and operated in compliance with Serbian law, EBRD Performance Requirements, EIB Environmental and Social Standards, and Good International Practice (GIP). This Environmental and Social Action Plan (ESAP) defines those actions. In general, the ESAP requires compliance with the Environmental and Social Management and Monitoring Programmes (ESMMP) that are part of an Environmental and Social Impact Assessment (ESIA) and includes specific requirements for actions whose purpose is to avoid, reduce, or otherwise mitigate the most significant potential impacts.

The table below constitutes the ESAP. It identifies the required actions, the basis of the requirement, the timing of the action, the criteria to be used for determining whether the required action has been successfully achieved, and information that will be reported to the Lenders. Implementation of the actions is the responsibility of WindVision.

When contractors perform work under contract to WindVision or their designee(s), WindVision will be responsible for those contractors’ compliance with the requirements of the ESAP. This is expected to be accomplished by inclusion of requirements in contracts and subcontracts, and by direct oversight and supervision by WindVision and/or its designee, as needed. It is anticipated that the primary contractor will have primary responsibility for implementation of most ESAP requirements during construction, with WindVision overseeing performance. WindVision will have primary responsibility during operation.

Performance of the actions required by this ESAP will be reported to the Lenders by WindVision as required by the ESAP and the financing agreements. Performance and compliance will be audited or otherwise evaluated by the Lenders throughout construction and operation of the Project.

As agreed by the Lenders and WindVision, this ESAP may be revised from time to time during Project implementation, sometimes in response to evaluations conducted under the ESAP itself. No changes will be made if they could allow violations of Serbian law or of Lenders’ requirements for environmental and social performance.

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<i>Requirement</i>		<i>Source of requirement</i>	<i>Implementation date</i>	<i>KPI / Reporting¹</i>
0	WindVision to prepare and submit environmental and social monitoring reports that show status of compliance with EBRD PRs, EIB E&S Standards, and with the requirements of this ESAP. Report to cover WindVision and contractor activities and performance.	EBRD PR1 EIB Std 1	Every six months during construction, at commissioning, and annually during operation	KPI: submission of report in mutually agreed format
<i>EBRD PR1: Environmental and Social Assessment and Management EIB E&S Standard 1: Assessment and Management of E&S Impacts and Risks</i>				
1.1	Design a framework for defining the organisational structure of WindVision and Alibunar A Project Management Team, with all key roles represented in an organogram. For construction, this is to include main contractor. Appoint and maintain person(s) to be responsible for environmental, social, and occupational health and safety (ESHS) for Alibunar A, to report directly to the project manager, and subsequently to WindVision management board.	EBRD PR1 EIB Std 1	Framework designed, responsible person(s) appointed: Within 90 days of financial close, but prior to construction	- Organogram designed - Responsible person(s) appointed/hired and on staff <i>ESHS reporting:</i> - Status of appointment(s), including CVs of appointed professionals
1.2	Develop and implement an integrated management system for environmental and social performance and for occupational health and safety. System and implementation during construction should be the responsibility of key project contractor under WindVision oversight; during operation, the	EBRD PR1 EIB Std 1	- Approve contractor systems: prior to construction - Develop operations system: prior to commissioning	- Development and implementation of the ESHS management system throughout the project. <i>ESHS reporting:</i>

¹ "KPI": Key performance indicator. "Reporting" = information to be reported to the Lenders in annual environmental and social monitoring reports under item 0.

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responsibility of WindVision. (See also requirement 1.5 below.) <i>[Note: system(s) should generally meet objectives of ISO14001 and OHSAS 18001, but need not be certified]</i>		- Implement: throughout during construction and operation	- Report to Lenders on status of system development and implementation
1.3 Update the ESIA's Environmental & Social Management and Monitoring Programmes (ESMMPs) incorporating requirements of the EIAs' ESMMPs and this ESAP for construction and then operation: contractor to update for construction, WindVision for operation. ESMMP to require detailed construction environmental management plan (CEMP) made up of associated subplans, including those specified in this ESAP. To include detailed timelines for implementation of specific mitigation measures and monitoring activities.	EBRD PR1 EIB Std 1	- Develop construction ESMMP/CEMP or approve contractor plans: prior to financial close - Develop operation ESMMP & ESMPs: prior to commissioning - Implement: throughout construction and operation	- ESMMP(s) developed and in place - Construction and operation in compliance with ESMMP <i>ESHS reporting:</i> - Report status of plan development - Report material deviations from plans
1.4 WindVision (see requirement 1.1) to review and approve ESMMP and contractor CEMP subplans, including review and approval by third-party consultancy acceptable to Lenders.	EBRD PR1 E&B Std 1	- Prior to construction	- ESMMP and CEMP subplans reviewed and approved by WindVision and competent third-party acceptable to Lenders - Plans provided to Lenders for review and no-objection approval <i>ESHS reporting:</i> - Status of ESMMP and subplan review and approval
1.5 WindVision to develop and implement Contractor/Subcontractor Management Plan to manage ESHS planning and performance of	EBRD PR1 EIB Std 1 GIP	- Develop/adopt: prior to executing contracts/ subcontracts	- Development, adoption, and implementation of contractor management system

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<p>construction and other contractors, including at a minimum:</p> <ul style="list-style-type: none"> - Inclusion of relevant ESAP requirements in contracts/subcontracts - Clear assignment of WindVision and contractor ESHS responsibilities - Contractor reports sufficient to allow WindVision to include relevant data in reports to Lenders, and to allow evaluation of need for corrective actions - Verification of training and/or proper credentials for contractor staff/managers responsible for ESHS 		<ul style="list-style-type: none"> - Implement: throughout execution of contracts/subcontracts 	<p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> - Report to Lenders on development of policy/procedures - Report ESHS training(s) of contractors/subcontractors - Report status and highlights of contractor oversight 	
1.6	<p>WindVision and contractor(s) to undertake activities that require permits or consents/decisions by relevant authorities only after such permits and/or decisions are in place. Comply with all required conditions.</p>	<p>Serbian law EBRD PR1 EIB Std 1</p>	<p>Prior to undertaking any activity that requires permit or authorization</p>	<ul style="list-style-type: none"> - Permits/authorizations received <p><i>ESHS reporting</i></p> <ul style="list-style-type: none"> - Report on status of permits/authorizations - Report immediately any citations or fines for noncompliance, and other instances of material noncompliance
1.7	<p>WindVision to appoint a qualified independent consultancy to audit ESHS performance against this ESAP and EBRD PRs/EIB E&S Standards. Implement corrective actions as needed to reach compliance.</p>	<p>EBRD PR1 EIB Std 1</p>	<ul style="list-style-type: none"> - Appoint: 3 months after construction start - Audit report: 5 months after construction start and one year after commissioning and full operation 	<ul style="list-style-type: none"> - Consultancy approved by Lenders and appointed - Audits completed and reports submitted to Lenders - Corrective actions implemented as specified by Lenders <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> - Identify candidate consultancy(ies)

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Requirement		Source of requirement	Implementation date	KPI / Reporting ¹
				<ul style="list-style-type: none"> - Report on status of appointment and audit - Report on status of corrective action implementation
EBRD PR 2: Labour and Working Conditions				
EIB E&S Standards 8 & 9: Labour Standards & Occupational Health, Safety and Security				
2.1.	Amend WindVision Rule Book on Employment to include: <ul style="list-style-type: none"> - Prohibition against child labour - Explicit right to collective bargaining and association - Employee grievance mechanism, including availability to contract employees 	EBRD PR2 EIB Stds 8&9	Within 3 months of commitment of funds or prior to construction (whichever is first).	<ul style="list-style-type: none"> - Rule Book amended - Rule Book inspected and approved by Lenders or third party acceptable to Lenders <i>ESHS reporting:</i> <ul style="list-style-type: none"> - Report status of HR policies and procedures - Provide summary of makeup of WindVision and contractor workforces by skill level, age, gender, geographic origin (local, other Serbian, expat), and other key variables
2.2	WindVision to require contractor(s) to adopt Rule Book on Employment or to review and approve contractor's HR policy: <ul style="list-style-type: none"> - Contractor policy(ies) must include ILO Core Labour Standards and meet requirements of EBRD PR2 and EIB E&S Standard 9. 	EBRD PR2 EIB Stds 8&9	Contractor adoption of Rule Book or WindVision approval of contractor(s) policy: prior to site activities	<ul style="list-style-type: none"> - Contractors' policies and procedures inspected and approved by WindVision, and by Lenders or third party acceptable to Lenders <i>ESHS Reporting:</i>

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<ul style="list-style-type: none"> - Contractor policy(ies) must contain an enforceable code of conduct applicable to all workers, including in particular those who are not of local origin, or contractor must have a stand-alone code. - Contractor policy(ies) must be available to workers in their language(s). 			<ul style="list-style-type: none"> - Report status of HR policies and procedures
<p>2.3</p> <p>Develop and implement occupational health and safety plan(s) to guide all activities on project site during site preparation, construction, and operation – for site preparation & construction, contractor to develop and implement plan, WindVision to review/approve. Plan requirements to include, at a minimum:</p> <ul style="list-style-type: none"> - Job- and task-specific hazard analysis and controls for all activities - Provision of personal protection equipment, requirements for use, and enforcement of use - Safety training for all personnel in their language, covering general hazards and safety protocols and those that are specific to their assigned tasks - Special training for specific hazards: working at heights, in excavations, with electricity - WV review and approval of contractor OHS plan(s), contractor review and approval of subcontractor plan(s) - Oversight of contractor OHS implementation, including mandatory reporting by contractor(s) 	<p>Serbian law EBRD PR2 EIB Std 8</p>	<p>Plans in place prior to undertaking on-site activities that would be subject to requirement.</p>	<ul style="list-style-type: none"> - OHS plans developed, reviewed/approved, and in place - Safe workplace, minimal incidents and lost time <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> - Provide evidence of review and approval of OHS plan(s) for all project contractors and subcontractors by qualified professional - Report on OHS matters, including work hours, incident statistics, and status of training (to cover entire site workforce) - Report immediately (within 48 hours) in case of major accidents and/or fatalities

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	- Recording incident statistics, including total work hours, lost time incidents, major injuries, fatalities, etc.			
2.4	WindVision to develop and implement a grievance procedure for all workers, including contractor employees, or require contractor to have equivalent procedure. Include in formal HR policy, ensure all workers know it is available (see requirement 2.1 above). <i>Note: this mechanism is separate from the one for external stakeholders that is part of the Stakeholder Plan under PR/PS 10.</i>	EBRD PR2 EIB Std 8	- Same as item 2.1 above - Dissemination of information to workers: at time of hiring or first work	- Adoption and implementation of employee grievance procedure <i>ESHS reporting:</i> - Report to Lenders summary of grievances and resolutions (WV & contractors)
EBRD PR 3: Pollution Prevention and Abatement EIB E&S Standard 2: Pollution Prevention and Abatement				
3.1	Contractor to develop and implement construction-phase dust suppression plan to ensure dusty loads are covered while in transit and earthen/gravel roads are wetted as needed to suppress dust.	Serbian law EBRD PRs 3,4 EIS Stds 2,9	- Develop: prior to construction - Implement: throughout construction when suppression is needed	Minimal occurrence of dust nuisance <i>ESHS reporting:</i> - Report any complaints and actions taken
3.2	If concrete batch plant is brought on-site, contractor to develop and implement emissions control plan (air and water and noise)	Serbian law EBRD PR3 EIB Std 2	- Develop: prior to operation of plant - Implement: throughout operation	- Emissions managed and in compliance <i>ESHS reporting:</i> - Report compliance status

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3.3	Contractor to develop and implement waste and hazardous materials management plans for construction, to cover all liquid and solid wastes and materials (chemicals, paint, fuel, construction debris, excess spoil, domestic/household wastes, spill cleanup debris, etc.). All vehicles to have spill cleanup kit. WindVision to develop and implement plan for operation.	Serbian law EBRD PR3 EIB Std 2	<ul style="list-style-type: none"> - Plan(s): prior to generation of wastes and management of hazardous materials - Implementation: throughout construction and operation 	<ul style="list-style-type: none"> - Identification of wastes and hazardous materials, development of plan(s) - All wastes and materials managed according to plan <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> - Report on status of plan development and approval by authorities (if required) - Report immediately any major releases or incidents
3.4	Contractor to prepare and implement earthen materials management plan, to include requirement to: <ul style="list-style-type: none"> - Salvage, segregate, and store in stable piles all topsoil and subsoil salvaged from all disturbed areas - Store rock in stable piles - Protect all storage piles with covers, including vegetative cover (native grass species) as needed to prevent wind/water erosion and desiccation - Use specific best practices to prevent or retard run-off from piles and from disturbed areas. - Reinstatement: as soon as disturbance ends 	EBRD PR3, 6 EIB Std 2, 3 GIP	<ul style="list-style-type: none"> - Plan: Prior to ground-disturbing activities - Topsoil/subsoil salvage and storage: salvaged immediately, stored until used for reinstatement - Erosion control per plan: throughout construction - Reinstatement: as soon as disturbance ends 	<ul style="list-style-type: none"> - Adoption of plan, implementation of best practices, protection of topsoil and stored rock - Minimal erosion and loss of topsoil <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> - Report to Lenders on plan status and highlights of erosion control program

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<p>3.5 Contractor to develop water management plan for construction phase, to include:</p> <ul style="list-style-type: none"> - Detailed assessment of water needs and potential sources, including measures to reduce water usage including use of wastewater for wetting roads, use/reuse in batch plant, etc. - Hydrogeologic evaluations of sustainability of water extraction from aquifers used by private and public wells, to include monitoring nearby wells to measure and evaluate aquifer response to project pumping including adjustments in plans or providing other water sources during periods of excessive drawdown. - Contingency actions and sources in case any public or private well cannot or does not provide all water needs, either continuously or periodically - If applicable, curtailment of water imports from any public water system as necessary to ensure other users suffer no shortages or loss of water 	<p>EBRD PR3, 4 EIB Std 2, 8</p>	<ul style="list-style-type: none"> - Plan developed: prior to initial use of water from project wells or other sources - Plan implementation and monitoring: throughout period of water use 	<ul style="list-style-type: none"> - Sufficient and sustainable water supply for all current users <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> - Status of water management plan - Limitations on source sustainability, if any, and highlights of contingency plans - Actions taken in case changes in water supplies or usage are needed
<p>3.6 If SF6 is to be used for insulation and current interruption in electric transmission equipment, WindVision to develop and implement plan to manage SF6 so as to minimize release to atmosphere. Plan should be consistent with Energy Network Association guidelines.</p>	<p>EBRD PR3 EIB Std 2 EU F-Gas Regulation</p>	<ul style="list-style-type: none"> - Plan developed: Prior to substation commissioning - Plan implemented: throughout operation 	<ul style="list-style-type: none"> - Plan developed and implemented if SF6 to be present - Minimal release of SF6 <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> - Report need for SF6 plan - Report status of plan development - Report any major releases

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EBRD PR 4: Community Health, Safety and Security				
EIB E&S Standard 9: Occupational and Public Health, Safety and Security				
4.1	Contractor to develop and implement plans and procedures to protect public health, safety and security. Plans and procedures to include, at a minimum: <ul style="list-style-type: none"> - Traffic management plan (see 4.2) - Public notices of hazards associated with works and equipment during construction and operation (see ESAP requirements 10.1 and 10.2) - Emergency preparedness and response plan, including collaboration with local responders - Security measures to prevent unauthorised access during construction and minimize access to substation and turbine interiors during operation 	Serbian law EBRD PR4 EIB Std 9	<ul style="list-style-type: none"> - Develop/approve plans and procedures: before construction. - Update plans and procedures as needed to keep up to date and relevant: throughout the project lifecycle. 	<ul style="list-style-type: none"> - Plans and procedures developed, made available, and implemented - Compliance with (as applicable) UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials, UN Code of Conduct for Law Enforcement Officials, Voluntary Principles on Security and Human Rights and the International Code of Conduct on Private Security Providers <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> - Report on status of plans and procedures development/approval - Report summary of incidents involving members of the public, including trespassers - Report to Lenders immediately if WindVision and/or contractors propose armed security --- report before providing arms.
4.2	Contractor to develop and implement traffic and transport management plan(s) to include access, routing, diversions, exceptional loads, driver training,	Serbian law EBRD PR4 EIB Std 9	<ul style="list-style-type: none"> - Develop/approve: prior to transport 	<ul style="list-style-type: none"> - Plan developed in consultation with local authorities

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<p>and signage. Plans must cover transport of turbines, rock/stone, and other materials to be brought to or removed from the site. Consult with local stakeholders and provide timely information to users of land of the times access to their land may be necessary, or when access may be limited. Plan to be developed in consultation with traffic/road authorities. Supported by WindVision, contractor to make every effort to coordinate traffic planning with developers/contractors of Čibuk wind project, including consultations with authorities.</p>		<p>- Implement: throughout equipment/materials transport</p>	<p>- Traffic managed in compliance with plan <i>ESHS Reporting</i> - Report on status of plan development/approval - Report summary of training and of traffic incidents</p>
<p>4.3 Beyond requirements of the environmental consent (including annual monitoring at nearest houses):</p> <ul style="list-style-type: none"> - During operation, WindVision to monitor noise at residences upon request and take actions to reduce or control noise as needed to meet applicable standards. - Contractor to ensure proper noise controls on vehicles and equipment. - When designing the substation, WindVision to use technology whose specifications ensure that noise standards will not be exceeded. - If piles are to be driven, contractor to conduct monitoring at nearest residences to verify noise levels are within standards and limit work to normal business hours. 	<p>Serbian law EBRD PR3,4 EIB Std 2 GIP</p>	<p>Monitoring and controls: monitor as requested and if piles are driven, control/ reduce noise as needed</p>	<ul style="list-style-type: none"> - Appropriate construction design to minimise noise - On-demand monitoring and mitigation as needed - Compliance with noise standards <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> - Report noise complaints, monitoring results, and mitigation measures applied

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<i>Requirement</i>	<i>Source of requirement</i>	<i>Implementation date</i>	<i>KPI / Reporting¹</i>
	- WindVision to implement mitigation measures to reduce operation noise if levels increase 3dB or more over background (compared to 5dB cited in environmental consent).		
4.4	WindVision to meet with potentially affected households (see ESIA) annually, investigate reports/complaints of shadow flicker. If needed, develop mitigation to prevent shadow flicker	EBRD PR4 EIB Std 9 GIP	<ul style="list-style-type: none"> - Investigate: upon receipt of complaint - Mitigation (turbine shutdown at certain hours of certain days in certain weather conditions): as needed - Compensation/mitigation: if needed and agreed by affected people <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> - Report shadow flicker complaints and actions taken
4.5	<p>WindVision to implement actions to ensure community benefits, including:</p> <ul style="list-style-type: none"> - Set goals for and encourage contractors to hire local workers, with preference for those who may be directly affected by noise, traffic, or other project activities. - Commission and implement a training program to upgrade skills of unskilled local workers as part of the social investment program. - Provide funding for local students' university education in science and/or engineering disciplines (e.g., ornithology, electrical engineering). 	EBRD PR4 EIB Std 9	<ul style="list-style-type: none"> - Establish goals: prior to engaging contractors - Commission training program: by financial close <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> - Significant local hiring, including semi-skilled and skilled workers - Training for local workers - Educational support provided - Maintenance of "social license to operate" - Report numbers of local vs non-local vs expatriate workers, and skill levels - Report funding provided for social investment program, including results such as training, education,

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	- Establish a Social Investment Program that would guide annual investments to benefit the Project as well as local communities and people.			
EBRD PR 5: Land Acquisition, Involuntary Resettlement and Economic Displacement EIB E&S Standard 6: Involuntary Resettlement				
5.1	WindVision to document and continue to implement procedure used to compensate landowners and others for incidental damages and losses caused by the Project.	Serbian law EBRD PR5 EIB Std 6	Replace/compensate as soon as possible after damages or losses	- No economic losses by any affected person <i>ESHS reporting:</i> - Report summary of damages/losses and status of replacement/compensation
EBRD PR 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources EIB E&S Standard 3: EIB Standards on Biodiversity and Ecosystems				
6.1	WindVision to appoint qualified professional(s) with expertise in ornithology and chiropterology to assist in implementation of requirements 6.2, 6.3, 6.4, 6.8, & 6.9.	EBRD PR6 EIB Std 3	- Appointment of expert(s): prior to financial close	- Expert(s) approved by Lenders and appointed
6.2	Expert(s) appointed under 6.1 to review/revise methodology for bird and bat monitoring to include the proposed transmission line corridor and the three valleys of conservation concern, plus the corridor to the pig farm pond, and to oversee implementation of the modified monitoring program, which is to continue for at least three years. Also survey for <i>Falco cherrug</i> nests and common roosts/hunting grounds within 2km. Bat	Serbian law EBRD PR6 EIB Std 3	- Modified and approved methodologies: within 60 day of financial close - Monitoring program implemented: within 90 days of financial close - Monitoring results: each 12 months of monitoring	- Methodologies modified, approved by Institute for Nature Protection and/or independent third-party expert. - Data collected, compiled, reported - Compiled data publicly available <i>ESHS reporting:</i>

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	monitoring to cover loss of habitat, mortality, migration, and behaviour. Make data available to Institute for Nature Protection.		<ul style="list-style-type: none"> - Provide evidence of Institute and/or expert approval of methodology - Provide summary of survey results 	
6.3	Expert(s) appointed under 6.1 to design and oversee implementation of methodology to measure bird and bat mortality due to collision with turbines and blades, and with transmission line. Continue monitoring until expert(s) conclude risk is adequately understood and acceptable, but for at least three years.	Serbian law EBRD PR6 EIB Std 3	<ul style="list-style-type: none"> - Methodology designed: prior to commissioning - Implemented: at least three years during operation, until expert(s) recommend cessation 	<ul style="list-style-type: none"> - Methodology designed, approved by Institute for Nature Protection and/or independent expert - Additional mitigation implemented, if needed <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> - Provide evidence of Institute and/or expert approval of methodology - Provide summary of survey designs and results - Describe any additional mitigation
6.4	Expert(s) appointed under 6.1 to conduct annual evaluation of bird and bat monitoring (items 6.2 and 6.4) and results in order to: <ul style="list-style-type: none"> - Reassess previous conclusions concerning bird/bat use, residence, and passage on and near the site - Reassess potential impacts on birds and bats - Recommend changes to operating parameters (such as rotation speed or operating hours during sensitive periods/hours) and/or other mitigation needed to reduce risk and mortality. 	EBRD PR6 EIB Std 3	<ul style="list-style-type: none"> - Appoint: prior to year 1 of operation - Recommendations for mitigation, possibly including radar: annually for three years 	<ul style="list-style-type: none"> - Reassessments/assessments completed - Recommended mitigations, if any, implemented <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> - Provide summary of assessments, including cumulative evaluations and recommendations - Describe mitigation measures recommended, if any

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- Consult with other operators and Institute for Nature Protection concerning cumulative monitoring results and the need for regional mitigation			
6.5 Prior to construction of transmission line towers, WindVision to appoint (or approve contractor-appointed) qualified ecologist/botanist to conduct surveys of habitat ALI05 in the transmission line corridor (and elsewhere, if detected); micro-locate towers to avoid specimens/populations of protected plant species. Also appoint ornithologist/ecologist to survey for Calandrella brachydactyla hungarica and other resident birds of conservation nesting in corridor. If needed to avoid disturbance to bird/fauna species of conservation concern, schedule nearby work to avoid critical lifecycle periods as recommended by expert. Expert to supervise construction within 100m of ALI05 habitat.	EBRD PR6 EIB Std 3	- Competent professional appointed and surveys conducted: immediately prior to construction of transmission line towers and associated roads - Mitigation/conservation implemented: as required to avoid impacts on species of conservation concern	- Competent professional appointed - Survey completed - No adverse effects on protected species <i>ESHS reporting:</i> - Report on status of appointment and surveys, and of any required mitigations
6.6 Take other measures to reduce impacts on birds, including: - Contractor to paint red stripe on blades if required by authorities - Contractor to clear vegetation around all turbines and remove any perching points (fences, bushes, etc.) within 100m of turbines. WindVision to maintain clearance during operation	Serbian law EBRD PR6 EIB Std 3	- Apply stripes: prior to commissioning - Clearing vegetation: prior to commissioning and at least annually thereafter - Crop spill cleanup: immediately after spill	- Stripes applied if required - Vegetation cleared initially and periodically thereafter <i>ESHS reporting</i> - Report highlights of actions taken

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<i>Requirement</i>	<i>Source of requirement</i>	<i>Implementation date</i>	<i>KPI / Reporting¹</i>
- WindVision to ensure crop spills are removed from around turbines as soon as practicable			
6.7 Contractor to prepare and implement a landscape management plan for all project activities. Plan is to call for (at a minimum): - Vegetation planting to screen views of substation and permanent buildings - Buildings, turbines, other permanent features painted in neutral unobtrusive colours, without logos, etc. - Use of native species for seeding/replanting. Avoid plants attractive to small mammals or insects near turbines. - Monitoring and repairs until vegetation is self-sustaining for at least three successive years - See also 3.6	EBRD PR4,6 EIB Stds 3,8	- Plan: Prior to construction - Implementation: throughout construction and operation	- Development and implementation of the plan - Agreement of planting areas - Clearing of vegetation only where required <i>ESHS reporting:</i> - Report highlights of plan and of implementation
6.8 WindVision to design transmission line towers to be “bird-friendly”, with sufficient spacing and insulation to minimize risk of electrocution of the largest bird species known to occur in Project area and Deliblato Sands area.	EBRD PR6 EIB Std 3 GIIP	- At time of design	- Bird-friendly towers - Minimal risk of electrocution of large birds <i>ESHS reporting:</i> - Report status of tower design
6.9 If recommended by competent experts appointed under 6.1 above: - Install bird diverters on all or part of transmission line conductors, including where the line crosses the valley with habitat ALI05.	EBRD PR6 EIB Std 3 GIIP	- Install diverters and/or platforms: as recommended by experts	- Bird diverters installed as recommended - Platforms installed as recommended - Minimal collision and electrocution mortality

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Requirement		Source of requirement	Implementation date	KPI / Reporting ¹
	- Install nesting platforms on towers over 2-3km (or other recommended distance) from nearest turbine.			- Increased nesting by bird species whose nest are co-opted by Saker falcons and other raptors <i>ESHS reporting</i> - Report status of bird diverters and platforms
6.10	WindVision to establish and maintain a collaborative relationship with developers of other windfarms in the vicinity of Alibunar A and B to enhance collective understanding of the potential cumulative impact of these windfarms. The objective will be to share information on bird and bat movement, collision risk, mortality, as well as management actions to mitigate possible cumulative impacts. The conclusions of any collaborative CIA activity should be used to inform and if relevant, revise the monitoring methodologies under 6.2, 6.2, and 6.3 above. Other areas of collaboration could be social investment programs (education grants, worker training, etc.).	EBRD PR6 EIB Std 3 GIP	- Information shared: as needed - Adaptive management: throughout construction and at least three years of operation	- Adaptive management approach implemented based on engagement with other developers/operators - Revision of methodologies as needed to address cumulative impacts; Information shared as requested - Collaboration leads to project and social benefits <i>ESHS Reporting:</i> - Report status of other wind projects in area and operators' collaborative efforts - Report on recommended changes to methodologies
6.11	WindVision to continue to engage with General Secretariat and Institute for Nature Protection to verify monitoring programs under 6.2, 6.3, and 6.4 meet the Compensation Rule Book's requirement for "continuous monitoring.	Serbian law	- At least once prior to commissioning and again after one year of operation	- Authorities engaged/consulted and convinced <i>ESHS reporting:</i> - Report results of engagement

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<i>Requirement</i>		<i>Source of requirement</i>	<i>Implementation date</i>	<i>KPI / Reporting¹</i>
EBRD PR 8: Cultural Heritage EIB E&S Standard 5: Cultural Heritage				
8.1	Contractor(s) to develop and implement chance finds procedure for Alibunar A, substation, and transmission line. Prior to construction of transmission line, WindVision to provide funding for Institute for the Protection of Cultural Monuments in Pančevo to complete excavations at transmission line tower locations and roads in Protection Zone I, appoint qualified archaeologist (or Institute) to oversee excavations at tower locations and roads in Protection Zone II, design tower 10 and route between 23-25 with appropriate “technical protection measures” as specified in Institute Decision 31/13.	Serbian law EBRD PR8 EIB Std 5	<ul style="list-style-type: none"> - Provide funding to Institute for Zone I: 6-12 months before construction of t-line - Notify Institute: at time of t-line construction permit application - Excavation in t-line Protection Zones: as specified by Institute - Implement chance find procedure: during all ground-disturbing activities 	<ul style="list-style-type: none"> - Institute involved at every stage - Procedure developed and implemented - No removal or loss of cultural heritage without appropriate conservation <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> - Report status of excavations and finds in protection zones, Institute decisions and changes in schedule or methods - Report discoveries and any implications for project
EBRD PR 10: Information Disclosure and Stakeholder Engagement EIB E&S Standard 10: Stakeholder Engagement				
10.1	WindVision to implement the Stakeholder Plan (SEP), including the grievance mechanism for external stakeholders, and a second round of public consultation. Engagement to include: <ul style="list-style-type: none"> - Make monitoring data available via website or otherwise on request. - Public meeting in Alibunar during disclosure period following notices in in settlements Seleuš, 	EBRD PR10 EIB Std 10	<ul style="list-style-type: none"> - Implement second round: during EBRD/EIB disclosure periods - Implement continuing engagement per SEP: throughout construction and operation 	<ul style="list-style-type: none"> - Stakeholders informed and engaged as defined in SEP - Grievance mechanism for external stakeholders in place and operational <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> - Report to Lenders highlights of stakeholder engagement

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<i>Requirement</i>	<i>Source of requirement</i>	<i>Implementation date</i>	<i>KPI / Reporting¹</i>	
<p>Vladimirovac, Banatsko Novo Selo, and Alibunar municipality: invite all stakeholders, prepare visual displays of key project information, provide knowledgeable company officials to answer stakeholder questions.</p> <ul style="list-style-type: none"> - Make available copies of ESIA documentation (updated ESIA, SEP, ESAP, NTS) at all open houses and maintain documents in all town halls. - Notify Bird Protection Society and Institute for Nature Protection of the availability of updated ESIA documentation and of open house meetings. - Post signs in populated zones along IB-10 and at junction with access road with notice of changes in traffic patterns, including days and times. - Post warning signs along municipal roads used by public and on IB-10 at intersection with access road. 			<ul style="list-style-type: none"> - Report to Lenders summary of grievances and responses 	
10.2	<p>In accordance with SEP, contractor to assist WindVision in providing early notice to villages and residents prior to major increases in traffic or other project activities that could affect them.</p>	<p>EBRD PR10 EIB Std 10</p>	<p>Notice provided: before impacts occur</p>	<ul style="list-style-type: none"> - Affected people given advance notice of changes in impacts <p><i>ESHS reporting:</i></p> <ul style="list-style-type: none"> - Report to Lenders highlights of notices