

Čibuk 1 Wind Farm

Environmental and Social Action Plan (ESAP)

Vetroelektrane Balkana d.o.o./Continental Wind Partners

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This Environmental and Social Action Plan (ESAP) has been compiled by the Wind Energy Balkan Group, Belgrade (Vetroelektrane Balkana d.o.o., Beograd) and Continental Wind Partners, (together referenced in this document as 'WEBG').

The ESAP is associated with a proposed 160+ MW Čibuk wind farm development, approximately 30 km to the north east of Belgrade in Serbia. The main project characteristics are:

- the purchase of plots of land for sitting wind turbines (already completed);
- the creation of appropriate foundations for the wind turbines and construction of site roads;
- the construction of appropriate infrastructure including underground power cables, a substation and connection to the main grid;
- the transport of turbine components to the site;
- the construction of the wind turbines;
- the operation of the wind turbines for approximately 25 years; and,
- replacement or decommissioning of the wind turbines.

An Environmental and Social Impact Assessment (ESIA) has been undertaken associated with the project. It describes the main features of the development, identifies its significant effects, together with appropriate management, mitigation and monitoring measures and has been produced in accordance with the international standards required by international financial institutions (IFIs). In addition an Environmental Impact Assessment (EIA) has been produced, disclosed in compliance with local regulatory requirements, and approved by the Vojvodina Secretariat for Urbanism, Construction and Environmental Protection in November 2012.

The table over the page constitutes the ESAP for the project. It identifies the actions required in order to manage and mitigate the project activities in accordance with international requirements and local regulatory requirements. The implementation of the actions is the responsibility of WEBG.

Table 1. Environmental and Social Action Plan - A: Corporate Environmental and Social Management Issues

No.	Action	Environmental Risk, Liability / Benefit	Legislative Requirement / EBRD / Good practice	Investment Needs / Resources Costs	Timetable Action to be Completed	Target and Evaluation Criteria For Successful Implementation	Comment
A. Corporate Environmental and Social Management Issues							
A.1	<p>ESMS Management System</p> <p>WEBG shall manage Environmental, Social and Health and Safety ("ESHS") matters in a manner that is compliant with:</p> <ul style="list-style-type: none"> • Applicable national and European Union regulations; • International good practice; • EBRD Environmental Policy (2008) Performance Requirements. <p>Management shall be achieved through the implementation of an appropriate management system that shall include:</p> <ul style="list-style-type: none"> • A corporate level ESHS improvement plan • Corporate ESHS monitoring and reporting • ESHS contract specification requirements for contractors and suppliers • Communication and implementation of contract EHS requirements • HR Policy and Grievance Mechanism • Retrenchment procedure <p>All requirements should be transferred to developers, subcontractors and any other persons acting for the Project.</p>	<p>Optimisation of management through a formalised system.</p> <p>Provide resources for training and monitoring of emissions.</p> <p>Transparency and consistency of operation.</p> <p>Reduces the risk of improper ESHS proceedings and operations during all project phases including activities involving developers and subcontractors.</p>	<p>Good Practice BAT EBRD PR 1, PR 2 and PR10</p>	<p>Own resources plus external support if required.</p>	<p>Prior to construction.</p>	<p>Implementation of the ESHS management system.</p>	<p>This measure ensures good practice as well as allows for effective management of the ESHS issues.</p>

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A.2	Annual Reporting Provide the investor with information on the environmental, health, safety and social matters in the form of an Annual Environmental and Social Report (AESR).	Need to disclose information to the Bank to show compliance with ESAP and current status of ESHS issues.	EBRD Environmental and Social Procedures (2010), Section 9 - Project Implementation and Monitoring.	Own resources plus external support if required.	12 months after financial close and annually for the duration of the agreement.	AESR against the actions listed within this ESAP.	
A.3	ESAP and LAP Publish and implement the Environmental and Social Action Plan (ESAP), with accompanying Land Acquisition Plan (LAP). The LAP will guide land acquisition for the Project to ensure compliance with international best practice and EBRD PR 5.	Transparency and enhanced corporate reputation.	EBRD PR 5.	Own resources plus external support if required.	Publish by September 24 th 2012.	Published on website and available at disclosure locations as specified in the SEP.	
A.4	Social Investment Plan Implement the WEBG Social Investment Programme and continue to support and lobby for investments in the Project area.	Transparency and enhanced corporate reputation.	ESIA Statement (mitigation of impacts).	Own resources plus external support if required.	Begin implementation from 2013, continue during operations.	Investment in accordance with the Social Investment Programme.	
A.5	Grievance Mechanism Develop and maintain a formal Grievance Mechanism for both internal (workers, subsidiaries) as well as external (local community, contractors) stakeholders. The Grievance mechanism is to include arrangements for monitoring and reporting grievances raises and their responses throughout the project life.	People can express their opinions and the complaints are effectively processed and result in proper mitigation measures. Tasks and responsibilities are clearly	Good Practice EBRD PR 2 and PR 10 WEBG Stakeholder Engagement Plan.	Atkins to provide first draft but CWP to maintain.	Immediately.	Grievance procedures put in place and publicised. Report grievances and action taken annually to the CWP Board and include reporting to the EBRD.	

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		identified.					
A.6	<p>Stakeholder Engagement Plan (SEP) Maintain and implement the Stakeholders Engagement Plan (SEP). The plan will include:</p> <ul style="list-style-type: none"> • Communication requirements for different stakeholder groups, • The requirement to establish local community contacts during the current operations and new projects, • Communication of the results of environmental monitoring on an annual basis. 	<p>Stakeholder engagement and public information will reduce the risk of unfounded conflicts with local community.</p> <p>Transparency and enhanced corporate reputation.</p>	Good practice EBRD PR 10.	Atkins to provide first draft but WEBG to maintain until two years post construction.	Immediate.	SEP published on website and disclosed to affected stakeholders. SEP implementation results will be part of annual reporting to the Bank.	

Table 2. Environmental and Social Action Plan – B: Pre-Construction Phase

No.	Action	Environmental Risk, Liability / Benefit	Legislative Requirement / EBRD / Good practice	Investment Needs / Resources Costs	Timetable Action to be Completed	Target and Evaluation Criteria For Successful Implementation	Comment
B. Pre-Construction Stage							
General Management Requirements							
B.1	<p>Construction Environmental Management Plan (CEMP)</p> <p>Develop and implement a Construction Environmental Management Plan (CEMP). The plan should include an outline of the project, the potential impacts associated with the construction phase of the project and the appropriate management techniques (standards and regulator requirements) that are expected to be implemented during construction. The plan should be developed to take account of the impacts, management and mitigation measures identified in the ESIS.</p> <p>The plan should be live and developed as the project develops. The plan should be used during contracting in order to guide the development of contractor method statements.</p> <p>The CEMP shall include the environmental requirements of this ESAP described in the following sections.</p>	Inadequate environmental management has high environmental and in turn financial consequences.	Local Regulatory Requirements & International Standards. Good practice.	Internal project cost, expert fees.	During the design phase.	Development of an appropriate plan.	
B.2	<p>Construction Phase Waste Management Plan</p> <p>Develop and implement a construction phase Waste Management Plan (WMP) to include measures to reduce waste at source, segregate of waste by hazardous properties and type to aid recycling, and</p>	Inadequate waste management has high environmental and in turn financial consequences. Environmentally friendly waste	Local Regulatory Requirements & International Standards. Good practice.	Internal project cost, expert fees.	During the design phase.	Construction sites inspection.	During the design phase designated areas can be included.

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	secure storage arrangements for waste.	management increases a company reputation.					
B.3	Construction Materials Storage Develop and implement a construction phase materials storage plan to ensure materials are stored securely and will not cause pollution. To cover storage of fuels, oils, cement and dusty materials, management of refuelling areas and spill response plans.	Ensure health and safety requirements are met. Minimise personal and project incidents from hazardous materials or inadequate access control measures.	Local Regulatory Requirements & International Standards. Good practice.	Internal project cost, expert fees.	During the design phase.	Construction sites inspection.	During the design phase designated areas can be included.
B.4	Environmental Construction Permits Confirm that all environmental and construction permits have been obtained prior to commencing construction.	Legal compliance. Risk of discontinuation if all legislative requirements have not been met.	Local Regulatory Requirements & International Standards. Good practice.	Internal project cost, expert fees.	Design stage used for information in applications.	Agreement of WMP with competent authority.	
B.5	Health and Safety Construction Management Develop Health and Safety construction management plans. The plans should include an outline of the project, the potential health and safety issues associated with the construction phase of the project and the appropriate management techniques (standards and regulator requirements) that are expected to be implemented during construction. The plans should be live and developed as the project develops. The plans should be	Inadequate health and safety management has high and in turn financial consequences.	EBRD PR 1 Best practice.	Internal project cost, expert fees.	During the design phase.	Published on website and training given in the appropriate measures to contractors and employees.	

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	used during contracting in order to guide the development of contractor method statements. The Health and Safety construction management plans shall include the health and safety related requirements of this section of the ESAP.						
B.6	Liaison with Local Health and Safety Facilities Cooperate and coordinate with local health and safety facilities to prepare them for foreseen influx of workers into the Project area and to ensure that this does not impact on community health, safety and security (law and order issues, social pathologies).	Transparency and enhanced corporate reputation.	EBRD PR 1, PR 4 and PR 10. E&S Policy. ESIA Statement (mitigation of impacts).	Internal project costs.	Prior to influx of workers.	Procurement records.	
B.7	Stakeholder Engagement: Construction Newsletters Produce and distribute quarterly newsletters, starting at least 6 months before construction and throughout the construction phase, informing local residents of project progress.	Transparency and enhanced corporate reputation. Contribute to the SEP.	EBRD PR 10. Local Regulatory Requirements & International Standards. Good practice.	Internal project costs.	Throughout project life.	Health and safety reports. Internal performance assessments.	
B.8	Accident and Incident Monitoring Develop and implement a Health, Safety and Environmental accident and incident monitoring procedure(s).	Ensure accurate record keeping. Indication of problem areas.	EBRD PR 1. Local Regulatory Requirements & International Standards. Good practice.	Internal project costs.	Prior to construction.	Accident records. Internally assessments of record.	The procedure should encompass issues reported from both within and outside the business, including interfaces with contractors reporting procedures as well as issues reported by members of the

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							public.
Ecology							
B.9	<p>Construction Ecological Management Controls</p> <p>Develop and implement construction-stage ecological management controls, covering vegetation clearance arrangements, identifying surveys required before site clearance, establishing measures to protect nesting birds, marking out vegetation and trees to be cleared measures to protect tree canopies and roots, watercourses etc. This information should be outlined in the CEMP and fulfil the ESIS and regulatory requirements.</p>	<p>Minimise environmental impact to activity areas.</p> <p>Enhanced corporate reputation.</p>	<p>Local Regulatory Requirements & International Standards.</p> <p>EBRD PR 3 and PR 6.</p> <p>Requirements laid out in the ESIS.</p> <p>Good practice.</p>	Internal project costs.	Prior to construction. Input into design.	Construction sites inspection.	The project planning phase should incorporate recommendation from the specialist surveys to minimise the environmental impact as far as possible. Suitable arrangements should be in place before construction starts.
B.10	<p>Bird and Bat Surveying</p> <p>Agree post construction bird and bat survey methodologies and programmes with local authorities and nature conservation authorities.</p> <p>Implement programmes.</p>	<p>Minimise environmental impact to activity areas.</p> <p>Enhanced corporate reputation.</p>	<p>Legislative requirement (environmental consent).</p> <p>Good practice.</p> <p>EBRD PR 3 and PR 6.</p>	Internal project cost and/or external experts (birds, bats monitoring).	Immediate.	On design/ construction/ demolition stage.	<p>Results of post-construction analyses should be summarized and published.</p> <p>Mitigation measure should be implemented if necessary.</p>
B.11	<p>Vegetation Clearance</p> <p>Identify trees and other vegetation that need to be cleared for construction work and for road improvements to allow access. Vegetation clearance should be minimised where ever possible, in particular in reference to habitats of conservation importance as identified in the ESIS.</p>	<p>Minimise environmental impact to activity areas.</p> <p>Enhanced corporate reputation.</p>	<p>Legislative requirement (environmental consent).</p> <p>Good practice.</p> <p>EBRD PR 3 and PR 6.</p>	Internal project cost.	Prior to the clearance of affected areas.	Detailed vegetation clearance plans.	

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B.12	<p>Vegetation Replanting</p> <p>Develop re-planting plan for trees, shrubs and areas of vegetation to be cleared during construction. Proposed planting should be locally sourced and native to the region. Trees and shrubs should be suitably protected, maintained and monitored for a minimum of 5 years upon completion of the proposed development. See also B 8. Screening through planting.</p>	<p>Minimise environmental impact to activity areas.</p> <p>Enhanced corporate reputation.</p>	<p>Legislative requirement (environmental consent).</p> <p>Good practice EBRD PR 3 and PR 6.</p>	Internal project cost.	Prior to the clearance of affected areas.	Detailed replanting scheme plans.	
Heritage							
B.13	<p>Archaeological Finds Procedure</p> <p>Develop and implement archaeological chance-finds reporting procedure. The chance-find procedure in relation to archaeological stands should be applied during construction works.</p>	<p>Prevention against damage to cultural heritage.</p> <p>Enhanced corporate reputation.</p>	<p>Legislative requirement. EBRD PR 8.</p> <p>Good practice.</p>	Internal project cost.	During construction works.	Periodical reports to Project Manager.	
B.14	<p>Protection of Cemetery</p> <p>Consider the need of protection of cemetery in Vladimirovac in planning roads' modernisation works and management of traffic and transport. Include this issue in the construction works management plan.</p>	<p>Prevention against damage to cultural heritage.</p> <p>Enhanced corporate reputation.</p>	<p>EBRD PR 4 and 8.</p> <p>Good practice.</p>	Internal project cost, expert fees.	Before start of construction works.	Construction Management Plan.	

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Landscape and Aesthetics							
B.15	<p>Landscape Screening</p> <p>Landscape Management and Mitigation Measures in the ESIS recommended that screening planting should be strategically located to create indirect screening features to receptors and areas which may experience adverse visual impact. Develop planting programme in agreement with local authorities.</p>	Ensure the minimisation of visual impact from the construction activities.	EBRD PR 3. Local Regulatory Requirements & International Standards.	Plan development by landscape specialist.	January 2013.	Agreement of planting areas. Clearing of vegetation only where required.	One of the more significant impacts of the proposed development is visual impact and mitigation measures should be put in place as soon as possible.
B.16	<p>Turbine Painting</p> <p>Agree turbine painting and marking scheme with appropriate authorities. Landscape and BAT Assessment in the ESIS recommendation that the proposed turbines should be a neutral colour such as a pale grey to blend with the muted colours of the surrounding landscape and predominant sky colours to reduce visual impact. If there is a significant deviation from this, reassess landscape and visual impact.</p>	Minimise negative visual impact, risk of complaints.	EBRD PR 3. Good practice (BAT).	Internal project cost.	Established prior to turbine purchase.	Detailed turbine design and finish information. If there is an amendment to the visual aspect of the turbines, a reassessment of the potential landscape and visual impact.	A reassessment should only be necessary if there is deemed to be a <i>significant</i> deviation from the proposed design as described in the ESIS. The determination of what is ' <i>significant</i> ' should be discussed with the investor and/or their representatives in the event that there are changes to design which may trigger the requirement for reassessment.

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B.17	Pylon Design Agree pylon design, painting and marking scheme and emergency power shut-off switching with local regulator.	Ensure co-operation of local authority. Minimise negative visual impact, risk of complaints. Transparency and enhanced corporate reputation.	EBRD PR 3. Good practice.	Internal project cost.	Prior to construction.	Detailed pylon design, finish and safety information.	Final design should be conveyed to stakeholders.
Traffic and Transport							
B.18	Traffic and Transport Management Plan Develop and implement a traffic and transport management plan to include access, routing, diversions and exceptional loads. Consult with local stakeholders - provide timely information to users of land of when access to their land might be more difficult. Agree with Local Authority.	Ensure additional safety to mitigate the expected impact of increased traffic in the region due to construction activities	EBRD PR 1 and PR 3. E&S Policy. ESIA Statement (mitigation of impacts).	Internal project cost.	Prior to and adjusted when needed during construction.	Development of plan, consultation and agreement of plan by local authorities.	
B.19	Road Upgrade Approval Agree detailed proposals for upgrade to local roads with local regulator.	Regulatory risk by not obtaining approval.	Local Regulatory Requirements & International Standards. Good practice.	Internal project cost.	Prior to construction.	Detailed road improvement scheme plans.	

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Noise, Vibration and Air Quality							
B.20	Wind Farm Noise Modelling Review noise modelling once turbines have been selected in order to predict noise levels at receptors, using manufacturer's data on turbine sound power levels and final turbine design details. Advise the bank of the accuracy or not of the noise modelling undertaken.	Transparency and enhanced corporate reputation. Noise is perceived to be one of the more significant impacts.	EBRD PR 3. Local Regulatory Requirements & International Standards.	Internal project cost.	Within 1 month of choice of turbine manufacturer.	Noise modelling update to EBRD.	The public should be notified of any changes in the noise model and mitigation measures put in place dependant on results.
B.21	Transformer Station Design When designing the transformer station, use such technology which ensures that noise standards will not be exceeded. This applies to the cumulative impact of the transformer station and the wind farm.	Will minimise the risk of noise level complaints from stakeholders. Working conditions will be acceptable.	EBRD PR 3 requirement. Good practice.	Internal project cost (CAPEX), expert fees.	Design stage.	Proper construction design.	
B.22	Construction Noise and Vibration Controls Identify and implement construction phase noise and vibration controls, including limitation on working hours to between 06:00-22:00 (although some large component deliveries will be scheduled outside these hours to minimise disruption:	Minimise noise and vibration impact to activity areas/surrounding areas. Transparency and enhanced corporate reputation.	EBRD PR 3. Local Regulatory Requirements & International Standards. Good practice.	Internal project costs.	Prior to construction. Input into design.	Accident records. Noise and vibration monitoring reports.	The project design phase should incorporate recommendation from the specialist surveys to minimise the noise and vibration impact as far as possible.

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	<p>this should be agreed with local authorities), control weekend working, and ensure vehicle and equipment maintenance.</p> <p>State the high level controls required in the CEMP.</p>						
B.23	<p>Construction Dust Suppression</p> <p>Develop and implement construction phase dust suppression plan to ensure dusty loads are sheeted and unsealed roads are damped-down.</p> <p>Include high level controls in the CEMP.</p>	<p>Ensure health and safety requirements are met, and minimising of risk of health complaints from members of the public and/or workforce.</p> <p>Minimise risk of disgruntled member of the public.</p>	<p>EBRD PR 3.</p> <p>Local Regulatory Requirements & International Standards.</p> <p>Good practice.</p>	<p>Internal project cost, expert fees.</p>	<p>Prior to construction.</p>	<p>Monitoring records.</p>	
Construction Workers Camp							
B.24	<p>Construction Camp Planning</p> <p>Develop detailed plans for construction camp(s) to ensure they are suitably located that they are managed to minimise environmental and social impact.</p>		<p>EBRD PR 1</p> <p>PR 3</p> <p>E&S Policy.</p>	<p>Internal project cost.</p>	<p>Before construction.</p>	<p>Construction sites inspection.</p>	<p>All aspects of the construction should be considered i.e. living conditions and access to resources.</p>

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Recruitment, Employees and Training							
B.25	Recruitment Procedures Put in place transparent and fair recruitment procedures and ensure that all non employee workers are engaged in line with both national legislation and applicable international (ILO) standards and recommendations.	Transparency and enhanced corporate reputation.	EBRD PR 1. E&S Policy. ESIA Statement (mitigation of impacts).	Internal project cost.	Prior to construction, during construction, operation.	Job opportunities, announcements. Contracts. Employment records. Grievance records.	Ensure that all potential applicants have access to workers grievance mechanism. Encourage employment of local workforce. Provide timely and transparent information regarding employment opportunities to local population and maximise hiring of local population.
B.26	Local Persons Employment Where possible select workers from the local area. Implement a training programme for the local workforce to enable them to take advantage of the opportunity.	Transparency and enhanced corporate reputation. Can contribute towards the CSR of CWP.	EBRD PR 1. E&S Policy. ESIA Statement (mitigation of impacts).	Internal project cost.	Prior to and during construction.	Use of local workers and skills training.	
B.27	Workers Code of Conduct Develop and implement a workers code of conduct to ensure appropriate behaviour	Minimise project risks associated with inappropriate	EBRD PR 1 and PR 4. ESIA		Prior to recruitment.	Workers code of conduct available and implemented.	

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	and project performance.	behaviour.	Statement (mitigation of impacts).				
B.28	Safety Awareness Campaign Implement safety awareness campaigns and training among workforce and local population on transport routes, if applicable, to avoid injuries by construction traffic and machinery during both construction and maintenance.	Lower risk of injuries and /or fatalities. Transparency and enhanced corporate reputation.	EBRD PR 4 and PR 10. Local Regulatory Requirements & International Standards. Good practice.	Internal project cost.	Prior to construction.	Construction sites inspection and health and safety incident reports.	

Table 3. Environmental and Social Action Plan – C: Construction Phase

C. Construction Stage							
C.1	<p>Construction Supervision</p> <p>Construction activities should be supervised by dedicated environmental and health and safety specialists, with the appropriate expertise to supervise the works.</p>	<p>Prevention of damage to environment, accidents prevention, solving problems, cooperation with administration. Supervision of implementation of consent decisions for construction works.</p>	<p>Best practice. EBRD PR 1. Legislative requirements.</p>	<p>Internal project cost.</p>	<p>During construction.</p>	<p>Supervision of works by appropriately qualified personnel.</p>	
C.2	<p>EHS Construction Management Plans: Implementation</p> <p>Implement environmental, health and safety construction management plans. The plan should be maintained and up to date throughout the construction phase of the project.</p>	<p>Minimise incident risk.</p>	<p>Local Regulatory Requirements & International Standards. Good practice.</p>	<p>Internal project costs.</p>	<p>Throughout construction.</p>	<p>Internal monitoring and performance assessment report.</p>	
C.3	<p>Environmental, Health and Safety Training</p> <p>Environmental, Health and safety training must be provided to ensure appropriate environmental performance and general work safety and housekeeping practices at the site (relates to employees, contractors and suppliers). The training programme shall be implemented into the project management system.</p>	<p>Compliance with the regulations. Minimisation of the risk of accidents/incidents at work. Increase OHS awareness of employees including subcontractors.</p>	<p>EBRD PR 1. Legislative requirements. Good practice.</p>	<p>Internal project cost and/or external specialist.</p>	<p>Starting at construction and extending throughout the project.</p>	<p>Appropriate training programme developed. Records on training.</p>	

C.4	<p>Service and Maintenance Schedule Produce a service and maintenance schedule for wind turbines and power line – required by Environmental Consent.</p>	Minimise incident risk.	Local Regulatory Requirements & International Standards. Good practice.	Internal project costs.	Completed during construction phase.	Appropriate maintenance schedules in place. Schedules adhered to and signed by responsible person. Evidence of internal performance assessments.	
C.5	<p>Stop Work Procedure Implement a procedure to stop work if any areas of ground contamination occur or are discovered. Procedures should be in place to make the area safe and arrange for analysis and risk assessment.</p>	Minimise incident risk.	Local Regulatory Requirements & International Standards. Good practice.	Internal project costs.	Throughout construction.	Appropriate procedures are in place.	

Table 4. Environmental and Social Action Plan – D: Operational Phase

D. Operational Stage							
D.1	<p>HSE Operational Management Plan</p> <p>Implement environmental, health and safety operational management plans, based on the impacts described in the ESIS.</p> <p>The plan should be maintained and up to date throughout the operational phase of the project.</p>	<p>Minimise incident risk and effective management of operational phase potential impacts.</p>	<p>Legislative requirement (environmental consent).</p> <p>Good practice.</p> <p>EBRD PR 3, PR 4 and PR 6.</p>	<p>Internal project cost and/or external experts.</p>	<p>Throughout operation (implemented prior to operational phase).</p>	<p>Development and implementation of an appropriate HSE Operational Management Plan.</p>	
D.2	<p>Implementation of Environmental Consents Conditions</p> <p>Implement the requirements of environmental consent decisions. These should include birds, bats and noise post-construction monitoring.</p> <p>Adjust the operational control procedure to control turbines in the light of the findings of the surveys and in agreement with regulatory authorities, if necessary.</p>	<p>Assurance of regulatory compliance and compliance with the performance standards stipulated by the investor.</p>	<p>Legislative requirement (environmental consent).</p> <p>Good practice.</p> <p>EBRD PR 3, PR 4 and PR 6.</p>	<p>Internal project cost and/or external experts (birds, bats, noise monitoring).</p>	<p>Throughout operation.</p>	<p>Site inspection.</p> <p>EIA Compliance audits/ performance assessments.</p>	<p>Results of post-construction analyses should be summarised and published. Should any impact on receptors (e.g. migratory birds) be identified then the operator must use selective turbine shutdown as the primary mitigation.</p>
D.3	<p>Municipality Payments</p> <p>Ensure all payments to Kovin municipality and local community Mramorak are made in a timely and transparent manner.</p>	<p>Agreement on business and technical cooperation in the execution of the Wind Plant Čibuk</p>	<p>Agreement for continuation of project.</p> <p>ESIA Statement (mitigation of</p>	<p>N/A</p>	<p>During operations.</p>	<p>Financial records and reports.</p>	

		project signed with Kovin municipality, 19.11.2008.	impacts).				
D.4	Track and Road Maintenance Regularly maintain access tracks and roads.	Transparency and enhanced corporate reputation.	EBRD PR 1. E&S Policy. ESIA Statement (mitigation of impacts).	Internal project cost and/or contractor.	During operations.	Site inspection and evidence of records of track and road maintenance.	

Table 5. Environmental and Social Action Plan – E: Decommissioning Phase

E. Decommissioning Stage							
E.1	EHS Decommissioning Plan Implement environmental, health and safety decommissioning management plans. The plan should be maintained and up to date throughout the decommissioning phase of the project.	Minimise incident risk.	Local Regulatory Requirements & International Standards. Good practice.	Internal project costs.	Plan should be in place prior to decommissioning and should be maintained throughout the decommissioning process.	Development and implementation of an appropriate HSE Decommissioning Plan.	

