

## ENVIRONMENTAL AND SOCIAL ACTION PLAN – GRCF: MINSK VODOKANAL PROJECT

No.	Action	Environmental & Social Risks (Liability / Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
<b>PR1</b>	<b>Assessment and Management of Environmental and Social Impacts and Issues</b>						
1.1	Prepare design documents for the updated project scope and update the national EIA (OVOS), following up on the recommendations of the State Environmental Expertise (SEE) of 2016 and outcomes of the international ESIA preparation and disclosure process in 2018, to obtain the necessary environmental and construction permits for project components including reconstruction of the MWWTP-1, sludge treatment complex and ash management disposal.	Compliance with the environmental permitting requirements	National Law EBRD Environmental and Social Policy (ESP) and Performance Requirements (PRs)	Company's own resources Assistance from project implementation support consultants	Design phase, Prior to start of construction activities	Evidence of effective follow up on the conclusions of the SEE of 2016 and ESIA disclosure outcomes and recommendations  A copy of the environmental and construction permits is available to EBRD	
1.2	Update the existing Environmental Management System (EMS) and Occupational Health and Safety Management System (OHSMS) for the Project implementation, in particular adjust the following components: <ul style="list-style-type: none"> <li>• Systems' area of application;</li> <li>• Identification of applicable requirements;</li> <li>• Identification and management of environmental aspects;</li> <li>• Identification of OHS hazards and risks management;</li> <li>• Interaction with external parties.</li> </ul>	Integration of the Project E&S management and H&S management into the overall management system at the Company level	EBRD PRs 1, 4 STB-ISO 14001-2005 OHSAS 18001:2007 and the new ISO 45001:2018 Best practice	Own resources, management time, assistance from external consultants	Procedures: Prior to start of construction  At commissioning  Revision of the management systems' area of application at the next certification audit	Documentary evidence of the relevant procedures developed and implemented  Project activities included in the management systems' area of application	
1.3	Institute commitments to management of social aspects in the corporate policy documents (develop an Integrated Environmental and Social Policy or develop a separate Social Policy document in addition to the existing Environmental Policy).	Adequate management of Project related social risks	EBRD PR 1	Own resources Support from project implementation and capacity building consultants	3 months after signing	Integrated Environmental and Social Policy (or a separate Social Policy) developed, introduced and integrated into the corporate management system	

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	Make own staff and contractors aware of the Policy provisions						
1.4	<p>Include into tender documents and subsequent agreements with selected contractors the requirement to manage environmental and social (E&amp;S) aspects of the contract works in line with the applicable national requirements and EBRD requirements for:</p> <ul style="list-style-type: none"> <li>• ESHS;</li> <li>• Working conditions, employment relations and personnel accommodation standards;</li> <li>• Community health and safety;</li> <li>• Environmental and social requirements to supply chain;</li> <li>• ESHS performance indicators;</li> <li>• Provision of grievance mechanism</li> </ul>	Adequate management of Project risks and impacts	EBRD PR 1 EBRD PR2	Own resources Support from project implementation consultants	Prior to issuing tender documents, and further during the Project implementation period	Adequate E&S requirements included in the tender documentation and agreements with contractors and subcontractors; Reputable and legitimate contractors hired	
1.5	Conduct regular inspections to monitor contractors' practices for compliance with the contractual duties in accordance with item 1.4 and social issues management provisions (item 1.3)	Making sure that contractors comply with Project ESHS responsibilities	EBRD PR 1 EBRD PR2 Best practice	Own resources Support from project implementation consultants	Starting from tender for design development and further during the Project implementation	Monitoring plan and management system in place Records of findings of inspections	
1.6	Develop and implement a Local Recruitment Policy and Local Procurement Policy (if required)	Enhancing economic benefits of the Project	EBRD PR 1 Best practice	Own resources or external consultant	Prior to selecting contractors at the construction phase	Appropriate policies are developed. The policies are communicated to the relevant stakeholders	<i>Can be combined with p.1.3 by incorporating into the Policy as separate provisions</i>
1.7	Prepare and submit Annual environmental and social report (AESR) to the Bank, including ESAP and SEP implementation progress status	Compliance with EBRD reporting requirements Implementation of the ESAP and SEP to mitigate project-related risks	EBRD PR 1 EBRD reporting requirements Respective E&S covenants in the legal agreements with the Bank	Own resources Support from project implementation support and corporate	6 months after financial close Twice a year at the construction phase and during the first year of operation	Internal responsibility (contact) assigned for implementation of the ESAP, SEP and submission of AESRs to the Bank. Name and contact details communicated to the Bank.	

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				development consultants	Annually during operation	AESR in the EBRD-approved format including ESAP implementation progress table prepared and submitted to EBRD in accordance with the agreed schedule in line with the legal agreements.	
<b>PR 2</b>	<b>Labour and Working Conditions</b>						
2.1	Make the internal grievance mechanism available to all Project personnel including contractors and subcontractors	Improved employer-employee relations Effective management and resolution of issues Lower Project ESHS risks	EBRD PR 2 Best practice	Own resources	By the time of contractors involvement	Internal grievance mechanism developed and communicated to personnel and contractors	Internal grievance mechanism is developed in line with EBRD requirements
2.2	In case of need to provide workers accommodation at construction camps, develop an Accommodation Management Plan in line with the applicable requirements	Provision of adequate temporary accommodation for construction workforce	EBRD PR 2 EBRD and IFC Guidance Note "Workers' Accommodation: Processes and Standards"	Own resources or external consultant	At the construction phase and prior to providing workers' accommodation in construction camps	Accommodation Management Plan developed and implementation in progress Acts of inspections for compliance with the Plan	
2.3	In the case labour restructuring becomes necessary, prepare a plan for a gradual approach in consultations with staff/unions. For any staff retrenchment of 10% or more at a time, develop a Retrenchment Plan.	Mitigation of labour restructuring impacts; Ensuring that any retrenchment is conducted according to the principles of consultation and non-discrimination.	EBRD PR 2 Best practice	Own resources or external consultant	At the operation phase	A labour restructuring plan developed and communicated Implementation of the plan inclusive of alternatives to dismissals such as retraining and reassigning, considering of options for early retirement	
<b>PR 3</b>	<b>Resources Efficiency and Pollution Prevention and Control</b>						
3.1	Include into the Main Contractor's scope the requirement to develop a Construction Environmental and Social Management Plan (CESMP) including the following issues:	Pollution prevention and control at the construction site Managing environmental	EBRD PR 3 Best practice	Main Contractor or external consultant  Own resources	Prior to start of construction Monitoring through regular inspections	CESMP developed and introduced. Records of inspections	

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	<ul style="list-style-type: none"> <li>Prevention of soil erosion and transport from the site territory;</li> <li>Soil displacement plan;</li> <li>Dust prevention measures;</li> <li>Arrangements for collection and treatment of storm water and drainage water;</li> <li>Prohibition of idle running of construction machinery;</li> <li>Management of demolition and construction wastes, keeping records of waste handling;</li> <li>Handling of hazardous materials and record keeping;</li> <li>Requirements on item 4.2 and other as appropriate.</li> </ul> <p>MVK shall approve the Main Contractor's CESMP and regularly monitor its implementation.</p>	aspects at the construction phase					
3.2	<p>Develop and implement Long-term Complex Sludge Management Plan including the following Project development stages:</p> <ul style="list-style-type: none"> <li>Before the commissioning of the sludge treatment complex;</li> <li>Trial period of operation of the sludge treatment complex;</li> <li>Operation at the required capacity, and the following aspects: <ul style="list-style-type: none"> <li>alternatives consideration for sludge treatment process depending on its composition;</li> <li>viability of the larger sludge treatment capacity.</li> </ul> </li> </ul>	<p>Pollution prevention and control, management of environmental aspects at the operation phase</p> <p>Compliance with legal requirements of RB and EU</p>	<p>EBRD PR3 RB Law EU Law Best practice</p>	<p>Main Contractor or external consultant</p> <p>Own resources, support from project implementation consultant</p>	<p>Prior to commissioning</p> <p>Implementation monitoring through regular inspections</p>	<p>Complex Sludge Management Plan developed and implemented</p> <p>Outcomes of annual monitoring assessment demonstrate implementation or update of Complex Sludge Management Plan</p>	
3.3	<p>Develop and implement Ash Management Plan at the operation phase including the following steps:</p> <ul style="list-style-type: none"> <li>Identification of category of the waste and preparation of permitting documents;</li> <li>Ash storage arrangements in line with the applicable requirements of RB and EU;</li> </ul>	<p>Pollution prevention and control, management of environmental aspects at the operation phase</p>	<p>EBRD PR3 RB Law EU Law Best practice</p>	<p>Main Contractor or external consultant</p> <p>Own resources, support from project</p>	<p>Preparation during the commissioning, implementation after commissioning</p> <p>Implementation monitoring through regular inspections</p>	<p>Ash Management Plan developed and implemented</p> <p>Ash Management Procedure developed</p> <p>Necessary environmental permit obtained and copy provided to the Bank</p>	

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	<ul style="list-style-type: none"> <li>Consider the potential for utilization of ash in construction industry or road works.</li> </ul> Develop Ash Management Procedure when ash disposal opportunities are identified.	Compliance with legal requirements of RB and EU		implementation consultant			
3.4	Develop and implement Volma Sludge Facilities Decommissioning Plan including the following measures (without limitation): <ul style="list-style-type: none"> <li>community safety arrangements;</li> <li>monitor surface water quality, geological and ground water conditions in the influence area of the sludge facilities;</li> <li>maintain the system for drainage water disposal to treatment as long as needed, up to the time of the facilities conservation or remediation;</li> <li>develop conservation and remediation measures.</li> </ul> Regular progress reporting on the Plan implementation.	Pollution prevention and control, management of environmental aspects at the operation phase	EBRD PR3 Best practice	Own resource with support from project implementation consultant	Prior to commissioning the sludge incineration facilities Regular reporting to EBRD using standard format	Volma Sludge Facilities Decommissioning Plan developed, implementation started Regular updates on this issue included in the reports to EBRD	
3.5	As soon as parameters and locations of air impact sources are identified as part of the design development: <ul style="list-style-type: none"> <li>amend the pollution dispersion modelling for the operation phase;</li> <li>make an inventory of emissions sources based on as-built documentation;</li> <li>develop SPZ reduction design documentation</li> </ul>	Air impact control	RB Law EBRD PR3	External contractor	Coordinated with design development phasing (specified)	Pollution dispersion analysis adjusted for the updated parameters of air impact sources Developed documentation for the reduced SPZ	
3.6	As soon as sludge incinerator building and other new facilities footprint is known, conduct geotechnical and environmental survey to clarify the properties and quality of ground subject to excavation Develop Soil Displacement Plan taking into account results of the survey	Ensuring safety of the facilities Prevention of environmental pollution	RB Law EBRD PR 3	External contractor	After locations (footprint) of the new facilities become known	Survey conducted and incorporated into the design documentation and Construction Management Plan	

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3.7	Develop a monitoring programme to cover air quality and noise level in the work area, near houses in the former village of Shabany and at the boundary of SPZ, ground conditions at the site, influent and effluent waste water quality, environment conditions in the area of influence, in accordance with recommendations of the Supplementary ESIA	Monitoring of impacts on air, geology, surface and ground water	RB Law EBRD PR 3 EU Industrial Emissions Directive Best practice	Own resources	3 months after signing and further regular updates in accordance with the Project implementation schedule	Monitoring programme developed with all factors incorporated Results of the monitoring included as part of annual reporting to the Bank	
3.8	When design documents are developed, check the greenhouse gas (GHG) emissions assessment and afterwards update it every time when resource efficiency measures are implemented or process parameters change.	Evaluation of Project contribution to climate change	EBRD PR 3 Best practice EBRD reporting requirements	Own resources or external consultant	Upon completion of design development	GHG emissions clarified and updated in case of significant changes of process parameters	
3.9	Develop and implement a Plan on Management and Monitoring of the Industrial Discharges in order to improve overall WWTP performance, reduce heavy metals content in sludge and the resulting ash	Control and reduction of the polluting industrial discharges, and particular their heavy metal content, in the wastewater flow treated by the municipal WWTP and in the resulting sludge	EBRD PR 1,3,4 Best practice	Company's own resources, support from project implementation consultants	Prior to start of operation of the reconstructed and new project facilities	Plan developed, copy provided to the Bank Evidence of regular implementation	
<b>PR4</b>	<b>Health and Safety</b>						
4.1	Develop and introduce a Code of Conduct for all Project personnel including contractors and subcontractors	Favourable working conditions on site and absence of conflicts with local communities	EBRD PR 4 Best practice	Own resources	Prior to start of construction	Code of conduct for all Project personnel including contractors and subcontractors developed and introduced	
4.2	Include in ToR (tenders) for preparation of design documentation (namely construction management and traffic management plans) the relevant requirements (in the	Mitigation of negative impacts on communities and infrastructure in the adjacent territories	EBRD PR 4 Best practice	Own resources Support from project implementation consultants	At preparation of design ToR and approval of the design documentation	ToR and design documentation compliant with the established requirements	

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	<p>Project's framework) on the personnel and the community safety measures, with due consideration of the potential impacts, including:</p> <ul style="list-style-type: none"> <li>• Site fencing and security;</li> <li>• Planning of traffic flows related to the Project in the public roads and onsite on the Project footprint with due account of load on the roads;</li> <li>• Conducting construction works with high noise and vibration impacts only at day time on work days, coordination of noisy work schedules;</li> <li>• Directing dark-time lighting inwards the site.</li> </ul> <p>Check compliance with the above requirements at the time of approval of the design documentation.</p>	Favourable working conditions on site and absence of conflicts with local communities					
4.3	<p>Interaction with the city and the local health services aimed at monitoring of public health of the affected groups, located in the former village Shabany, and disclosure of information on the potential impacts related to the Project. In case of the health deterioration due to the Project (justified from the local health services or authorities) received, a public health assessment shall be provided for the mentioned affected communities.</p>	Mitigation of negative impacts on community health and wellbeing	Best practice	Own resources Support from the local health services and the city	At the construction and operation phases	<p>The Project impact information is disclosed to the affected groups in the former village of Shabany, the City, the local health services and authorities.</p> <p>Periodic round-table talks or meetings are provided to follow up the issue status, as required.</p> <p>Assessment of impact of MWWTP emissions on health of residents of the above mentioned houses is provided (in case of the health deterioration due to the Project justified from the local health services or authorities)</p>	
4.4	<p>Develop Construction and Operation Health and Safety Management Plans (or update the existing ones, as relevant), to include specific</p>	Mitigation of construction and operation	Best practice & past incident/accident data from wastewater sector	Own resources, support from post-signing consultants	At the construction and operation phases	Procedures for confined space working and trench safety / earth works safety	

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	procedures on confined space working, trench safety, electrical safety, working at height, etc.	occupational health and safety risks	EBRD PR4			developed and copy supplied to the Bank Gas detectors and adequate instruction/supervision provided to staff for any confined space working	
<b>PR5</b>	<b>Land Acquisition, Involuntary Resettlement and Economic Displacement</b>						
5.1	In the case resettlement of the households within the SPZ becomes unavoidable, the resettlement will be carried out in accordance with national law and PR5. Prior to any resettlement activity, the client will notify EBRD, prepare a resettlement action plan (RAP) subject to EBRD approval.	Minimizing and mitigating negative social impacts. Protection of public health.	EBRD PR5 EBRD PR4 National law Best practice	Own resources	RAP prepared prior to resettlement	RAP prepared and agreed with EBRD prior to resettlement. Consultations with the affected people. Monitoring of RAP implementation.	
<b>PR6</b>	<b>Biodiversity and Living Natural Resources</b>						
6.1	Develop and implement River Svisloch monitoring programme in the area of direct influence of MWWTP, to monitor status of the river and identify the need for compensation measures	Monitoring of recipient waterbody and risks to aquatic life due to potential eutrophication of River Svisloch in the influence area of MVK	EBRD PR 6 Best practice	Own resources, with support from the City and local environmental authorities	Prior to start of construction and afterwards regularly	River Svisloch monitoring programme developed, monitoring activities conducted, corrective actions developed as required	
<b>PR8</b>	<b>Cultural Heritage</b>						
8.1	Develop transportation plan for the Project workforce, materials and equipment without use of roads leading to the Trostenets memorial park (to be taken into account at preparation of design ToR and at approval of the design documents)	Prevention of impacts on the access routes of the Trostenets memorial park	EBRD PR 8	Own resources	At preparation of design ToR At approval of the design documentation At the construction phase	The requirement is included in design ToR The materials and equipment transportation schemes do not affect access roads to the memorial park Approved driving directions for delivery of the Project supplies	



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<b>PR 10</b>	<b>Information Disclosure and Stakeholder Engagement</b>						
10.1	Develop and implement Stakeholder Engagement Plan (SEP), inclusive of public grievance mechanism Appoint public relations manager / officer in charge of the Project engagement activities Update SEP regularly	Efficient consultation and engagement process throughout the Project life cycle	EBRD PR 10 Best practice UNECE Aarhus Convention – “Disclosing Environmental Information: Guidance for Operators Providing Public Services”	External consultant Own resources	Q1 2018 and further as required	SEP developed and adopted at MVK. Stakeholder consultations are arranged in line with SEP, including consultations with residents of houses in the former Shabany village. SEP updated regularly or as required  Documented process and procedure for receiving and handling of grievances. Copy of grievance mechanism provided to EBRD.  Number and type of grievance reported to EBRD	SEP has been developed
10.2	Ensure disclosure of Project information in accordance with SEP Develop and disclose the Project package of documents including: <ul style="list-style-type: none"> <li>• EIA Report;</li> <li>• Supplementary ESIA Report;</li> <li>• Environmental and Social Action Plan;</li> <li>• Stakeholder Engagement Plan;</li> <li>• Non-technical Summary</li> </ul>	Awareness rising on significant aspects of the Project	EBRD PR 10 Disclosure process requirements for Category A projects, EBRD, 2016 Best practice	External consultant Own resources	Q4 2017 – Q1 2018 and further as defined in SEP	The disclosure package developed and published at the web sites of MVK and EBRD and made available to stakeholders. Timely disclosure in accordance with SEP of updates on the Project nature and impacts (including beneficial) and availability of grievance mechanism	The disclosure package has been developed  Consultations are being held in accordance with SEP