

Environmental and Social Assessment for EBRD

CATEGORY A PROJECT

ŽIVINICE REGIONAL SOLID WASTE PROJECT BOSNIA AND HERZEGOVINA



ENVIRONMENTAL AND SOCIAL ACTION PLAN

21 June 2018

Abbreviations

AESR	Annual Environmental and Social Report
CESMP	Construction Environmental and Social Management Plan
CSOP	Construction Site Organisation Plan
CWMP	Construction Waste Management Plan
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EP	Environmental Permit
ESAP	Environmental and Social Action Plan
ESMS	Environmental and Social Management System
EU	European Union
IDP	Internally Displaced Persons
LB	Landfill Body
OESMP	Operational Environmental and Social Management Plan
OHS	Occupational Health and Safety
PR	Performance Requirements
PRTR	Pollutant Release and Transfer Register
RSL	Regional Sanitary Landfill
SEP	Stakeholder Engagement Plan

1 INTRODUCTION

The European Bank for Reconstruction and Development (“EBRD”) is considering providing finance to the Živinice Regional Solid Waste Project (the “Project”). The Project involves the construction and operation of an EU-compliant regional sanitary landfill (“RSL”) that will serve three municipalities in Tuzla Canton: Živinice, Banovići and Kladanj.

This Environmental and Social Action Plan (“ESAP”) includes key actions which the Public Enterprise “Eko-Sep” d.o.o. Živinice (“Eko-Sep”) should undertake during the implementation of the Project to ensure that EBRD’s Performance Requirements (“PRs”), as well as national and EU legislation are met. ESAP has been developed taking into account the findings of the environmental and social (“E&S”) due diligence carried out in March and April 2018. **The ESAP will constitute an integral part of the financing agreement with the EBRD.**

Eko-Sep **will be responsible for ensuring that third parties or contractors working on project sites meet the requirements of the ESAP** by adopting and implementing an appropriate contractor management system. This is expected to be accomplished by inclusion of appropriate requirements and conditions in public procurement documents, contracts and subcontracts, and through direct oversight and supervision by Eko-Sep. The Tender Documents and construction contract will meet the EBRD Standard Tender Document requirements.

Eko-Sep is required to establish and maintain an E&S Management System (ESMS) appropriate to the nature and scale of the Project and commensurate with the level of its E&S impacts and issues in line with good international practice. Eko-Sep will also need to designate specific personnel, including management representative(s), with clear lines of responsibility and authority to maintain and implement the ESMS, and ensure that employees with direct responsibility for activities relevant to the E&S performance of the Project and Eko-Sep’s operations are suitably qualified and trained.

Eko-Sep is also required to establish an overarching E&S Policy defining the E&S objectives and principles that enable the Project to achieve sound E&S performance. The policy will provide a framework for the E&S assessment and management process consistent with the principles of the PRs.

Eko-Sep will monitor the implementation of actions specified in this ESAP.

Based on the monitoring results, Eko-Sep will identify and reflect any necessary corrective and preventive actions in an amended ESAP (as agreed with the EBRD), implement the agreed corrective and preventive actions, and follow up on these actions to enhance their performance.

Eko-Sep will be required to provide regular reports to the EBRD on the E&S performance of the Project, including compliance with the PRs and implementation of the ESMS, ESAP and Stakeholder Engagement Plan. Eko-Sep will prepare and submit to EBRD Annual Environmental and Social Reports on E&S and health and safety issues, and will be audited or otherwise evaluated by EBRD throughout the implementation phases of the Project. The EBRD may also periodically verify the monitoring information prepared by Eko-Sep through site visits by the Bank’s E&S specialists and/or independent experts. Eko-Sep must promptly notify the EBRD of any E&S incident or accident relating to Eko-Sep or the Project which has, or is likely to have, a significant adverse effect, or of any changes to the Project’s scope, design or operation that is likely to materially change its E&S impacts and issues.

EBRD Environmental and Social Action Plan

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
PR 1	Assessment and Management of Environmental and Social Impacts and Issues						
1.1	<p>Eko-Sep to comply with all the requirements defined in the Environmental Permit and other obtained permits, including PRTR reporting provisions.</p> <p>Eko-Sep to obtain and comply with the remaining permits as required by national legislation:</p> <ul style="list-style-type: none"> • Water Permit for Phase 1 after the RSL is constructed • Water Consents/Permits and Construction Permit for Phase 2 • Use Permits for both phases 	<ul style="list-style-type: none"> • Compliance with national requirements 	<ul style="list-style-type: none"> • <i>Law on Environmental Protection</i> • <i>Law on Water</i> • <i>Law on Physical Planning and Land Use at the Level of FBiH</i> 	<p><i>Responsibility:</i> Eko-Sep</p> <p><i>Resources:</i> In-house resources</p>	In line with the timeframe defined by national requirements	<p>Permits obtained in a timely manner</p> <p>Included in AESR to EBRD</p>	
1.2	<p>Eko-Sep to develop and implement an Environmental and Social Management System (ESMS), covering environmental and social (E&S) requirements including:</p> <ul style="list-style-type: none"> • Review of E&S risks and associated operational controls • Clearly defined roles, responsibilities and authority for implementation of the ESMS • Implementation and monitoring of Construction E&S Management Plan (CESMP), Operation Environmental and Social Management Plan (OESMP), Stakeholder Engagement Plan (SEP) and this ESAP 	<ul style="list-style-type: none"> • Optimisation of E&S management through a formalised system • Compliance with EBRD requirements 	<ul style="list-style-type: none"> • EBRD PR1 – E&S Management Systems • Best practice 	<p><i>Responsibility:</i> Eko-Sep</p> <p><i>Resources:</i> In-house resources</p>	As soon as possible but prior to start of construction at the latest	<p>ESMS developed and implemented</p> <p>Roles and responsibilities for implementation of ESMS defined and clearly communicated to the involved Eko-Sep employees</p> <p>Included in AESR to EBRD</p>	
1.3	<p>Eko-Sep to develop and implement an overarching E&S Policy (ESP) for the ESMS defining the environmental and social objectives and principles that enable the project to achieve sound environmental and social performance</p>	<ul style="list-style-type: none"> • Compliance with EBRD requirements 	<ul style="list-style-type: none"> • EBRD PR1 – E&S Policy 	<p><i>Responsibility:</i> Eko-Sep</p> <p><i>Resources:</i> In-house resources</p>	As soon as possible but prior to start of construction at the latest	<p>ESP developed</p> <p>Included in AESR to EBRD</p>	
1.4	<p>Prior to start of construction, Eko-Sep to require from its contractors to prepare and implement:</p> <ul style="list-style-type: none"> • Construction Waste Management Plan (CWMP) • Construction Site Organization Plan (CSOP) including: <ul style="list-style-type: none"> ○ a) Construction E&S Management Plan (CESMP) <ul style="list-style-type: none"> - At a minimum, the CESMP will cover measures for the following aspects: air emissions, noise and vibration management, soil management, hazardous material management, spill response management, emergency preparedness and 	<ul style="list-style-type: none"> • Compliance with national and EBRD requirements 	<ul style="list-style-type: none"> • EBRD PR1, PR2, PR3, PR4, PR 8, PR 10 • <i>Law on Waste Management</i> • <i>Law on Environmental Protection</i> • <i>Decree on Construction Site</i> 	<p><i>Responsibility:</i> Eko-Sep to supervise, Contractor to implement</p> <p><i>Resources:</i> Contractors' internal resources</p>	During signing of contract with Contractor for construction works	<p>Request for development of CWMP and CSOP incorporated into contracts with Contractor</p> <p>Evidence of CWMP and CSOP with accompanying plans prior to start of construction</p> <p>Included in AESR to EBRD</p>	

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	<p>response, grievance management for workers and for external stakeholders, security personnel requirements, information disclosure and stakeholder engagement, chance find procedure, community health and safety management, workers' accommodation and traffic management.</p> <ul style="list-style-type: none"> o b) OHS and Fire and Explosion Management Plan 		<p><i>Organization, Mandatory Documentation on Construction Site and Construction Work Participants</i></p> <ul style="list-style-type: none"> • Good international practice 				
1.5	<p>Prior to start of RSL operation, Eko-Sep to ensure that an Operation Environmental and Social Management Plan (OESMP) is in place. At a minimum, the OESMP will cover mitigation measures for the following aspects: waste management, soil management, air emissions management, noise management, spill response management, hazardous material management, emergency preparedness and response (covering management of possible surplus of leachate), traffic management, security personnel requirements, grievance management for workers and for external stakeholders, information disclosure and stakeholder engagement, and health and safety management.</p> <p>Applicable Main Design provisions to be incorporated in the OESMP.</p> <p>Ensure that landfill closure and after-care procedures are included in the OESMP, in line with the provisions of the Environmental Permit and the Main Design.</p>	<ul style="list-style-type: none"> • Compliance with EBRD requirements 	<ul style="list-style-type: none"> • EBRD PR 1, PR 2, PR 3, PR 4, PR 10 	<p><i>Responsibility:</i> Eko-Sep</p> <p><i>Resources:</i> In-house resources</p>	<p>Prior to start of RSL operation</p>	<p>Evidence of OESMP</p> <p>Included in AESR to EBRD</p>	
1.6	<p>Eko-Sep to submit annual environmental and social reports to EBRD, including ESAP implementation progress.</p>	<ul style="list-style-type: none"> • Implementation of the ESAP to mitigate project-related risks and fulfilment of the annual reporting requirements to the Bank 	<ul style="list-style-type: none"> • EBRD 2014 E&S Policy • Respective E&S covenants in the legal agreement with the Bank 	<p><i>Responsibility:</i> Eko-Sep</p> <p><i>Resources:</i> In-house resources</p>	<p>Communicate E&S contact name and contact details to EBRD within 3 months from signing</p> <p>Regular contact with EBRD on ESAP implementation</p> <p>Annual E&S</p>	<p>Internal responsibility assigned for implementation of the ESAP and submission of AESRs to EBRD.</p> <p>Name and contact details communicated to EBRD.</p> <p>AESR in the EBRD-approved format including ESAP implementation progress submitted to EBRD on time, as required by the legal</p>	

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					reporting to the Bank	agreements.	
PR 2	Labour and Working Conditions						
2.1	In case workers' accommodation is needed, Eko-Sep to ensure that the Contractor includes in CESMP provisions on workers' accommodation in accordance with PR provisions and the EBRD/IFC Guidance Note "Workers' accommodation: processes and standards" 2009 referred to in PR 2.	<ul style="list-style-type: none"> Compliance with EBRD requirements 	<ul style="list-style-type: none"> EBRD PR2 – Grievance mechanism EBRD/IFC Guidance Note "Workers' accommodation: processes and standards" 	<i>Responsibility:</i> Eko-Sep to supervise, Contractor to implement <i>Resources:</i> Contractor's resources	Prior to start of construction	Workers' accommodation provisions included in Construction E&S Management Plan Provisions implemented during construction works Periodic checks including site visits and reports on contractors Included in AESR to EBRD	
2.2	Eko-Sep to develop, adopt and communicate to all of its employees an internal grievance procedure for workplace concerns in accordance with PR 2.	<ul style="list-style-type: none"> Compliance with EBRD requirements 	<ul style="list-style-type: none"> EBRD PR2 – Grievance mechanism EBRD Guidance Note on Grievance Management 	<i>Responsibility:</i> Eko-Sep <i>Resources:</i> In-house resources	Prior to start of RSL operation	Developed, adopted and communicated internal grievance procedure Included in AESR to EBRD	
2.3	Eko-Sep to monitor that Contractor follows the national legislation on labour and OHS, as well as PR 2 provision on grievance mechanism for workplace concerns . The Contractor to ensure that any sub-contractors apply the same standards. Eko-Sep to monitor contractor E&S performance including implementation of PR 2 standards by carrying out regular site visits (both planned and unannounced).	<ul style="list-style-type: none"> Compliance with local legislation requirements and EBRD PR 2 	<ul style="list-style-type: none"> Labour Law of FBiH Law on OHS of FBiH EBRD PR2 – Non-employee workers 	<i>Responsibility:</i> Eko-Sep to supervise, Contractor to implement <i>Resources:</i> Contractor's resources	During the entire construction phase	Provisions on applying the relevant requirements of FBiH legislation and PR2 incorporated into contracts with Contractor Periodic checks including site visits and reports on contractors Included in AESR to EBRD	
PR 3	Resource Efficiency and Pollution Prevention and Control						
3.1	Require from Contractor to include in CESMP and implement mitigation measures for air quality . In addition to measures defined in the local EIA study, also include the following: <ul style="list-style-type: none"> Machines and vehicles to be used in construction 	<ul style="list-style-type: none"> Compliance with national, EBRD and EU requirements Best construction practices 	<ul style="list-style-type: none"> EBRD PR 3 Law on Environmental Protection Law on Air 	<i>Responsibility:</i> Eko-Sep to supervise (via supervision of external	During the entire construction phase	Evidence of CSOP with accompanying plan CESMP including measures for air management prior to start of construction	

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	<p>activities must have use/operation permits</p> <ul style="list-style-type: none"> • Machines and vehicles must have installed filters to reduce soot emission • Vehicles need to be regularly maintained • The equipment and machinery need to be shut down when not in use • High quality fossil fuels (with low percentage of sulphur and lead) need to be used as motor fuel for machinery and equipment <p>The CESMP to include monitoring provisions during the construction phase as defined in the local EIA study.</p>		<p><i>Protection</i></p>	<p>supervisor), Contractor to implement</p> <p><i>Resources</i> Contractors' resources</p>		<p>Included in AESR to EBRD</p>	
3.2	<p>Include in OESMP and implement specific mitigation measures for air quality. In addition to measures defined in the local EIA study, also include the following:</p> <ul style="list-style-type: none"> • Machines and vehicles to be used in maintenance activities must have use/operation permits • Machines and vehicles to be used in maintenance activities must have installed filters to reduce soot emission • High quality fossil fuels (with low percentage of sulphur and lead) need to be used as motor fuel for machinery and equipment 	<ul style="list-style-type: none"> • Compliance with national, EBRD and EU requirements 	<ul style="list-style-type: none"> • EBRD PR3 • <i>Law on Environmental Protection</i> • <i>Law on Air Protection</i> 	<p><i>Responsibility:</i> Eko-Sep</p> <p><i>Resources:</i> In-house resources</p>	<p>Prior to start of RSL operation</p>	<p>Evidence of OESMP</p> <p>Included in AESR to EBRD</p>	
3.3	<p>Monitor landfill gas as required by Annex III the EU Landfill Directive 1999/31 (including gases to be monitored and the frequency of monitoring)</p>	<ul style="list-style-type: none"> • Compliance with national, EBRD and EU requirements, particularly the <i>Landfill Directive</i> 	<ul style="list-style-type: none"> • EBRD PR3 • <i>Law on Environmental Protection</i> • <i>Law on Air Protection</i> 	<p><i>Responsibility:</i> Eko-Sep</p> <p><i>Resources:</i> In-house resources</p>	<p>During the entire operation phase and after-care period</p>	<p>Evidence of reports regarding the monitoring of landfill gas</p> <p>Included in AESR to EBRD</p>	
3.4	<p>Require from Contractor to include in CESMP and implement mitigation measures for noise management. In addition to measures defined in the local EIA study, also include the following:</p> <ul style="list-style-type: none"> • Equipment and machinery need to be shut down when not in use • Machinery must have use/operation permits • In case of noise complaints by local residents, simultaneous use of machines that generate noise over 70 dB needs to be limited • Machines and vehicles to be used in construction activities must have use/operation permits 	<ul style="list-style-type: none"> • Compliance with national, EBRD and EU requirements • Best construction practices 	<ul style="list-style-type: none"> • EBRD PR 3 • <i>Law on Environmental Protection</i> • <i>Law on Protection Against Noise</i> 	<p><i>Responsibility:</i> Eko-Sep to supervise (via supervision of external supervisor), Contractor to implement</p> <p><i>Resources</i> Contractors' resources</p>	<p>During the entire construction phase</p>	<p>Evidence of CSOP with accompanying plan CESMP including measures for noise management prior to start of construction</p> <p>Included in AESR to EBRD</p>	

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	The CESMP to include monitoring provisions during the construction phase as defined in the local EIA study.						
3.5	<p>Include in OESMP and implement specific mitigation measures for noise management. In addition to measures defined in the local EIA study, also include the following:</p> <ul style="list-style-type: none"> • Restriction of works to daytime only (from 06:00 to 22:00 in line with the <i>Law on Protection Against Noise</i>) • Equipment and machinery need to be shut down when not in use • Machinery must have use/operation permits • In case of noise complaints by local residents, simultaneous use of machines that generate noise over 70 dB needs to be limited • Machines and vehicles to be used in construction activities must have use/operation permits <p>Monitoring of noise to be undertaken during the operation phase as required by the IED Directive.</p>	<ul style="list-style-type: none"> • Compliance with national, EBRD and EU requirements 	<ul style="list-style-type: none"> • EBRD PR3 • <i>Law on Environmental Protection</i> • <i>Law on Protection Against Noise</i> 	<p><i>Responsibility:</i> Eko-Sep</p> <p><i>Resources:</i> In-house resources</p>	Prior to start of RSL operation	Evidence of OESMP Included in AESR to EBRD	
3.6	<p>Require from Contractor to include in CESMP and implement spill response management plan and emergency preparedness and response management plan. In addition to measures defined in the local EIA study, also include:</p> <ul style="list-style-type: none"> • Written procedures for management of such activities with appointed responsible work places and roles given to employees to handle the situation 	<ul style="list-style-type: none"> • Compliance with national, EBRD and EU requirements • Best construction practices 	<ul style="list-style-type: none"> • EBRD PR 3 • <i>Law on Environmental Protection</i> • <i>Law on Water</i> 	<p><i>Responsibility:</i> Eko-Sep to supervise (via supervision of external supervisor), Contractor to implement</p> <p><i>Resources</i> Contractors' resources</p>	During the entire construction phase	Evidence of CSOP with accompanying plan CESMP including measures for spill response emergency preparedness and response prior to start of construction Included in AESR to EBRD	
3.7	<p>Include in OESMP and implement specific mitigation measures for spill response and emergency preparedness and response management. In addition to measures defined in the local EIA study, also include:</p> <ul style="list-style-type: none"> • Written procedures for management of such activities with appointed responsible work places and roles given to employees to handle the situation • Procurement and use of adsorbent material in case of spills • Final disposal of used adsorbent material need to be undertaken by engaging the authorized third parties • Develop a sub-plan covering management of possible 	<ul style="list-style-type: none"> • Compliance with national, EBRD and EU requirements 	<ul style="list-style-type: none"> • EBRD PR 3 • <i>Law on Environmental Protection</i> • <i>Law on Water</i> 	<p><i>Responsibility:</i> Eko-Sep</p> <p><i>Resources:</i> In-house resources</p>	Prior to start of RSL operation	Evidence of OESMP Included in AESR to EBRD	

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	surplus of leachate during Phase 1 and 2, including (i) procurement and use of a pump and a cistern to temporarily receive any surplus of leachate, and (ii) final disposal of leachate needs to be undertaken by third parties.						
3.8	<p>Monitor the quality of wastewater, surface water and groundwater as follows:</p> <ul style="list-style-type: none"> leachate as required by Annex III of the EU Landfill Directive 1999/31 including parameters to be monitored (leachate volume and frequency) leachate composition in line with the EP composition of River Oskova (e.g. downstream of RSL) as required by Annex III the EU Landfill Directive 1999/31 (as a precautionary measure) groundwater as required by Annex III the EU Landfill Directive (as a precautionary measure) effluent from the oil separator in line with <i>Decree on Conditions for Discharge of Wastewater into Environment and into the Public Sewerage System</i> <p>Report on monitoring results to the Sava River Watershed Agency and FMET (for PRTR purposes).</p>	<ul style="list-style-type: none"> Compliance with national, EBRD and EU requirements, particularly the <i>Landfill Directive</i> 	<ul style="list-style-type: none"> EBRD PR 3 <i>Law on Environmental Protection</i> <i>Law on Water</i> <i>Decree on Conditions for Discharge of Wastewater into Environment and into the Public Sewerage System</i> 	<p><i>Responsibility:</i> Eko-Sep</p> <p><i>Resources:</i> In-house resources</p>	During the entire operation phase, and after-care period (except for effluent from the oil separator)	<p>Evidence of reports regarding the monitoring of waste waters, surface waters and groundwater</p> <p>Included in AESR to EBRD</p>	
3.9	Undertake visual monitoring of leachate levels as recommended in the EP to prevent accidental discharge during Phase 1 and 2, on a regular basis and especially in cases of heavy rainfall	<ul style="list-style-type: none"> Compliance with national, EBRD and EU requirements, particularly the <i>Landfill Directive</i> 	<ul style="list-style-type: none"> EBRD PR 3 <i>Law on Environmental Protection</i> <i>Law on Water</i> 	<p><i>Responsibility:</i> Eko-Sep</p> <p><i>Resources:</i> In-house resources</p>	During the entire operation phase until Phase 3	<p>Evidence of reports on monitoring of leachate levels during Phase 1 and 2</p> <p>Included in AESR to EBRD</p>	
3.10	Clean the septic tank as well as the oil separator on a regular basis by engaging an authorised third party	<ul style="list-style-type: none"> Compliance with national, EBRD and EU requirements 	<ul style="list-style-type: none"> EBRD PR 3 <i>Law on Environmental Protection</i> <i>Law on Water</i> <i>Law on Waste Management</i> 	<p><i>Responsibility:</i> Eko-Sep</p> <p><i>Resources:</i> In-house resources</p>	During the entire operation phase	<p>Evidence of reports regarding cleaning of the septic tank and the oil separator</p> <p>Included in AESR to EBRD</p>	
3.11	Eko-Sep to appoint a responsible person for waste management in line with the <i>Law on Waste Management</i>	<ul style="list-style-type: none"> Compliance with national requirements 	<ul style="list-style-type: none"> <i>Law on Waste Management</i> 	<p><i>Responsibility:</i> Eko-Sep</p> <p><i>Resources:</i> In-house resources</p>	Prior to construction phase	<p>Evidence of Eko-Sep decision on appointment of a responsible person for waste management</p> <p>Included in AESR to EBRD</p>	

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3.12	<p>Record waste quantities generated both during the construction phase and operation phase</p> <p>Limit final disposal of waste only to:</p> <ul style="list-style-type: none"> municipal non-hazardous waste and inert construction non-hazardous waste (at designated area at LB) <p>Prohibit the final disposal of <i>special categories of waste</i> (waste oils, car batteries, tires etc.) and any hazardous waste at the LB. Such types of waste may only be temporarily disposed of in specialised containers of the recycling yard.</p> <p>Engage a third party to undertake final disposal of the following waste types:</p> <ul style="list-style-type: none"> any surplus of leachate sludge and wastewater from the septic tank sludge from the oil separator special categories of waste and hazardous waste from the recycling yard 	<ul style="list-style-type: none"> Compliance with national, EBRD and EU requirements 	<ul style="list-style-type: none"> EBRD PR 3 <i>Law on Environmental Protection</i> <i>Law on Waste Management</i> 	<p><i>Responsibility:</i> Eko-Sep</p> <p><i>Resources:</i> In-house resources</p>	During construction and operation	<p>Records of waste quantities and waste types</p> <p>Included in AESR to EBRD</p>	
3.13	Plant a green barrier along both sides of the road through the IDP settlement "Ježevac" made from tall autochthonous trees (see item 4.4 below)	<ul style="list-style-type: none"> Compliance with EBRD requirements 	<ul style="list-style-type: none"> EBRD PR 3, PR 4 	<p><i>Responsibility:</i> Eko-Sep to supervise (via supervision of external supervisor), Contractor to implement</p> <p><i>Resources:</i> Contractor's resources</p>	During RSL construction	<p>Green barrier planted during construction works</p> <p>Included in AESR to EBRD</p>	
3.14	Undertake all other monitoring as required by Annex III of the Landfill Directive (e.g. topography of landfill body and meteorological data) during the operation and after-care phase	<ul style="list-style-type: none"> Compliance with EU requirements 	<ul style="list-style-type: none"> Landfill Directive PR 3 	<p><i>Responsibility:</i> Eko-Sep</p> <p><i>Resources:</i> In-house resources</p>	During the operation and after-care phase	<p>Evidence of monitoring reports</p> <p>Included in AESR to EBRD</p>	
PR 4	Health and Safety						
4.1	Eko-Sep to develop and communicate to all employees internal OHS regulations as required by national legislation.	<ul style="list-style-type: none"> Safe working environment for 	<ul style="list-style-type: none"> <i>Law on Safety at Work</i> 	<p><i>Responsibility:</i> Eko-Sep</p>	As soon as possible but prior	Internal OHS regulations adopted and communicated	

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		RSL employees	<ul style="list-style-type: none"> Law on the Protection against Fires and Protection of Fire-fighters 	<i>Resources:</i> In-house or external consultant support	to start of RSL operation at the latest	to all employees Included in AESR to EBRD	
4.2	<p>For the construction phase, Eko-Sep to require from Contractor to develop an OHS and Fire and Explosion Management Plan as part of the CESMP, and ensure that the OHS measures defined in the Main Design for the construction phase are included in such plan.</p> <p>Ensure that CESMP includes operational plans for emergency interventions, as well as measures to prevent or minimise the potential for worker and community exposure to hazardous materials (as defined in the local EIA study and the Main Design).</p> <p>Monitor Contractor's compliance.</p>	<ul style="list-style-type: none"> Safe working environment and improved HS performance of contractors Adequate emergency response 	<ul style="list-style-type: none"> Decree on Construction Site Organisation, Mandatory Documentation on Construction Site and Construction Work Participants EBRD PR 4 	<i>Responsibility:</i> Eko-Sep to supervise, Contractor to implement <i>Resources:</i> Contractor's resources	Prior to start of construction works	<p><i>Construction phase:</i> CESMP developed prior to construction and includes an OHS and Fire and Explosion Management Plan, which contains all OHS measures defined in the Main Design for construction. Operational plans for emergency interventions, as well as measures to prevent or minimise the potential for worker and community exposure to hazardous materials included in CESMP.</p> <p>Formal contractor monitoring procedure implemented and audited to confirm compliance.</p>	
4.3	<p>For the operation phase, Eko-Sep to ensure that the OHS Study developed as part of the Main Design for the operation phase is included in the OESMP.</p> <p>Ensure that OESMP includes measures to prevent or minimise the potential for worker and community exposure to hazardous materials (as defined in the local EIA study and the Main Design).</p> <p>Develop an emergency preparedness and response plan as part of the OESMP. The plan must include organisational structures, responsibilities, procedures, communication, training, resources and other aspects required to implement the plan.</p>	<ul style="list-style-type: none"> Safe working environment and improved HS performance of contractors Adequate emergency response 	<ul style="list-style-type: none"> EBRD PR 4 	<i>Responsibility:</i> Eko-Sep <i>Resources:</i> In-house or external consultant support	Prior to start of RSL operation	<p><i>Operation phase:</i> OESMP includes OHS Study developed as part of the Main Design, as well as measures to prevent or minimise the potential for worker and community exposure to hazardous materials</p> <p>Documented Emergency Preparedness and Response Plan</p> <p>Included in AESR to EBRD</p>	
4.4	Eko-Sep to ensure that a green barrier made from tall	<ul style="list-style-type: none"> Minimising risks 	<ul style="list-style-type: none"> EBRD PR 4 	<i>Responsibility:</i>	During RSL	Green barrier and safety	

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
	autochthonous trees and a safety fence are placed along both sides of the road through the IDP settlement "Ježevac" to partially absorb noise, reduce air emissions and provide a safety barrier for the settlement inhabitants.	and nuisances to the local population		Eko-Sep to supervise, Contractor to implement <i>Resources:</i> Contractor's resources	construction	fence requirement included in Tender Document Green barrier and safety fence installed during the construction works Included in AESR to EBRD	
4.5	Eko-Sep to include in Tender Documents requirements concerning the quality and standards for equipment and materials as defined in the Main Design, as well as a requirement that the quarries and borrow pits that will supply construction materials have valid EPs, in order to ensure that construction materials come from authorised sources.	<ul style="list-style-type: none"> Ensuring safety and quality of used construction materials Minimising risks associated with the Project supply chain 	<ul style="list-style-type: none"> EBRD PR 4 	<i>Responsibility:</i> Eko-Sep <i>Resources:</i> In-house resources	Prior to start of construction works	Tender Documents include quality and standards for equipment and materials as defined in the Main Design Tender Documents include the requirement that the quarries and borrow pits that will supply construction materials have valid EPs	
4.6	In addition to providing general OHS trainings as defined in the Main Design, Eko-Sep to provide appropriate training to workers on driver and vehicle safety , as required by EBRD Policy.	<ul style="list-style-type: none"> Ensuring road and traffic safety 	<ul style="list-style-type: none"> EBRD PR 4 	<i>Responsibility:</i> Eko-Sep <i>Resources:</i> In-house resources or external consultant support	Prior to start of RSL operation	Trainings conducted and documented Included in AESR to EBRD	
PR 6	Biodiversity and Living Natural Resources						
6.1	Selection of plant species for the green barrier in IDP settlement Ježevac to be limited only to autochthonous species in order to preserve the domestic gene pool	<ul style="list-style-type: none"> Compliance with national and EBRD requirements 	<ul style="list-style-type: none"> EBRD PR 6 <i>Law on Nature Protection</i> 	<i>Responsibility:</i> Eko-Sep to supervise, Contractor to implement <i>Resources:</i> Contractor's resources	Prior to tendering procedure	Selection of autochthonous species included in the Tender Document Included in AESR to EBRD	
6.2	Prior to construction works, Eko-Sep to require from Contractor to engage a professional biologist/ecologist to inspect the area of the swamp with regard to presence	<ul style="list-style-type: none"> Compliance with national, EBRD and EU requirements 	<ul style="list-style-type: none"> EBRD PR6 <i>Law on Environmental</i> 	<i>Responsibility:</i> Eko-Sep to supervise,	Prior to construction phase	Evidence of the report of the survey	

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	<p>of amphibians.</p> <p>In case amphibians species are found, the species to be relocated to the nearest moist habitat. This will also help to prevent any fatalities to other animals that may be hidden in tall reeds.</p>		<p><i>Protection</i></p> <ul style="list-style-type: none"> • <i>Law on Nature Protection</i> 	<p>Contractor to implement</p> <p><i>Resources:</i> Contractor's resources</p>		Included in AESR to EBRD	
6.3	Contractor needs to reduce the possibility of formation of shelters for small animals during the construction phase by clearing of unused construction material	<ul style="list-style-type: none"> • Protection of animals 	<ul style="list-style-type: none"> • EBRD PR 6 • <i>Law on Environmental Protection</i> • <i>Law on Nature Protection</i> 	<p><i>Responsibility:</i> Eko-Sep to supervise (via supervision of external supervisor), Contractor to implement</p> <p><i>Resources</i> Contractors' resources</p>	During RSL construction	Included in AESR to EBRD	
PR 8	Cultural Heritage						
8.1	<p>Eko-Sep to develop Chance Find Procedure for managing chance finds, defined as physical cultural heritage encountered unexpectedly during project implementation, share with Contractor to implement during construction works, and ensure relevant staff and Contractor is trained in its requirements.</p> <p>The provisions of Chance Find Procedure need to include:</p> <ul style="list-style-type: none"> • Notification of relevant competent bodies of found objects/sites; • Alerting project personnel to the possibility of chance finds being discovered; • Fencing-off the area of finds to avoid any further disturbance or destruction. 	<ul style="list-style-type: none"> • Compliance with EBRD requirements • Minimising risks to unknown cultural heritage 	<ul style="list-style-type: none"> • EBRD PR 8 – Cultural Heritage 	<p><i>Responsibility:</i> Eko-Sep</p> <p><i>Resources:</i> In-house or external consultant support</p>	Prior to construction (preparation of procedure) and during construction phase (implementation of procedure)	<p>Chance Find Procedure developed</p> <p>Training (which may be part of induction) recorded</p> <p>Included in AESR to EBRD</p>	
PR 10	Information Disclosure and Stakeholder Engagement						
10.1	Eko-Sep to implement and update the Stakeholder Engagement Plan (SEP) as needed, to ensure that all stakeholders are identified, that sufficient information about issues and impacts arising from the Project and proposed mitigation measures are disclosed in a timely	<ul style="list-style-type: none"> • Compliance with the EBRD's requirements • Management of risks and impacts 	<ul style="list-style-type: none"> • EBRD PR10 - Information disclosure and stakeholder engagement 	<p><i>Responsibility:</i> Eko-Sep</p> <p><i>Resources:</i> In-house</p>	Continuously	Monitoring reports on the results of the stakeholder engagement process as defined in SEP	

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	<p>manner and that all stakeholders are consulted in a meaningful and culturally appropriate way throughout project implementation.</p> <p>Ensure that Contractor implements the grievance management provisions defined in SEP, by including such provisions in the tender documentation and contracts signed with the contractors.</p> <p>Contractors (including security personnel) to be trained on grievance mechanism.</p>	<ul style="list-style-type: none"> on communities affected by the Project 	<ul style="list-style-type: none"> UNECE Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters 	resources		Grievance management provisions related to Contractors included in tender documentation and contracts signed with the contractors	
10.2	<p>Eko-Sep to dedicate a responsible person for stakeholder engagement. This person will have clear responsibilities in:</p> <ul style="list-style-type: none"> coordinating the stakeholder engagement activities within Eko-Sep monitoring the implementation of the SEP keeping records of all stakeholder engagement activities undertaken by Eko-Sep, including records of public meetings publication of all relevant information and documentation management of stakeholder grievances and keeping records of grievances as defined in SEP, as well as identification of risks associated with the filed grievances and defining corrective actions updating the SEP as necessary reporting to Eko-Sep management and EBRD on stakeholder engagement activities 	<ul style="list-style-type: none"> Effective stakeholder management 	<ul style="list-style-type: none"> EBRD PR10 - Information disclosure and stakeholder engagement 	<p><i>Responsibility:</i> Eko-Sep</p> <p><i>Resources:</i> In-house resources</p>	As soon as possible	Responsible person for stakeholder engagement appointed and communicated to EBRD	
10.3	<p>After the completion of construction works and during the period of obtaining the Use Permit for the RSL facility, Eko-Sep to inform the public in advance about the expected start of RSL operation and the planned job vacancies in order to allow the local population to prepare for possible employment opportunities, by posting information on the bulletin boards and websites of the three involved Municipalities.</p>	<ul style="list-style-type: none"> Encouraging employment of local population as suggested by the Environmental Permit 	<ul style="list-style-type: none"> Environmental Permit requirements 	<p><i>Responsibility:</i> Eko-Sep</p> <p><i>Resources:</i> In-house resources</p>	During the process of obtaining the Use Permit for the RSL	Information posted on the bulletin boards and websites of the three involved Municipalities	