

APPENDIX C
ENVIRONMENTAL AND SOCIAL ACTION PLAN

APPENDIX C ENVIRONMENTAL AND SOCIAL ACTION PLAN

Taking into account the findings of the ESDD, an Environmental and Social Plan (ESAP) has been developed for the Project. The ESAP contains mitigation and performance improvement measures and actions that address the identified social and environmental issues/gaps. The mitigation measures are actions designed to ensure that the Project will operate in compliance with relevant local laws and regulations, as well as EBRD's Environmental and Social Policy (2008) Performance Requirements (PRs) in all relevant stages of the Project. The ESAP focuses on avoidance of identified environmental and social impacts where possible, or on the mitigation measures to minimize or reduce possible impact to acceptable levels.

The General Road Directorate (GRD) is responsible to implement the ESAP in accordance with the proposed measures and defined time schedule. The GRD will ensure that employees with direct responsibility for activities relevant to the Project's or the company's social and environmental performance are adequately qualified and trained so that they have the knowledge and skills necessary to perform their work.

The GRD shall also establish procedures to monitor and measure compliance with the environmental and social provisions of the legal agreements including effective implementation of the ESAP and improvements achieved over time against the baseline established during appraisal. The Monitoring Reports will be prepared at least quarterly. The summary of Monitoring Report will be made available to the public, as part of the Client's consultation process with the affected stakeholders.

Responsible Department/person will inform the GRD's senior management regularly about the progress in implementing the ESAP.

As part of their regular reporting to the EBRD, the Client will provide the EBRD with updates on its progress in ESAP implementation.

ENVIRONMENTAL AND SOCIAL ACTION PLAN (PR COMPLIANCE)						
No.	EBRD PR	Key environmental and social issues	Actions to be taken	Deadline / Time frame	Responsibility	Priority¹
1	PR 1 – Environmental and social appraisal	The project environmental and social impacts have been assessed and relevant measures summarized in an Environmental and Social Management Plan (ESMP) for all project life stages including material supply and transport. However the former EBRD Policy (dated 2003) has been used as reference document for the EIA preparation.	Specific environmental and social issues which need to be further assessed are detailed in the ESDD document and in the relevant ESAP. Tender documentation should therefore include the ESMP as well as the PR Compliance Document and this ESAP.	Prior to tendering	GRD	1
2	PR 1 – Environmental and social appraisal	The location of disposal sites for waste, quarries and/or borrow pits, temporary construction sites and worker's camps are not yet defined.	The area of influence of the project shall be re-assessed when all service areas and sites will be selected.	Prior to construction	GRD	1
3	PR 2 – OHS	Projects shall comply with relevant EU OHS requirements and, where such requirements do not exist, relevant IFC EHS guidelines in the sections referred to OHS.	Contractors shall establish and maintain an OHS MS in line with International standard (OSHAS 18001) and/or guidelines. GRD shall appoint an Independent Engineer (i.e. the Supervisor) to monitor the OHS-MS performance of the Contractors.	Before and during Construction	Contractor Supervisor (to control)	1
4	PR2 – OHS	No specific written procedures are in place for workers grievances.	The contractor will provide a grievance mechanism for workers to raise reasonable workplace concerns and a process for their resolution. A responsible person in charge of the internal grievances management shall be designated within the GRD. GRD shall appoint an Independent Engineer (i.e. the Supervisor) to monitor the Contractors' workers grievance mechanism effectiveness.	Before construction	Contractor Supervisor (to control)	

¹ 1 – of high importance, 2 – somewhat important, 3 – of low importance

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No.	EBRD PR	Key environmental and social issues	Actions to be taken	Deadline / Time frame	Responsibility	Priority ¹
5	PR2 – OHS	A proper management of Unexploded (UXO) should be ensured for the protection of the on-site workers and communities.	A procedure for the management of UXO's shall be established, which include a stop work procedure and safety measures to be adopted in the event of a UXO find.	Before construction	Contractor	1
6	PR 3 – Waste water discharge	The road drainage consists in an open system directly discharging road runoff to surface water bodies. Only the drainage system of the bridges (anchored pipe system) is a sealed system ready to collect water and bring them to the first rain water treatment plants (not foreseen), while water treatment is foreseen only for two service areas.	Specific request for the design and implementation of a closed drainage system with water treatment at least at sensitive locations should be included in the Tender documentation.	Before tendering	GRD	1
7	PR3 – Atmospheric Contaminants	In the 2011 EIA it is assumed that, due to the low traffic level and the landscape characteristics of the area, the Project will not lead to any major increase of atmospheric pollutants, and WHO standards are <i>likely</i> to be respected. However, atmospheric impacts of the new road have not been quantified.	The GRD should appoint an independent Consultant to assess the baseline atmospheric pollutants (dust, NO _x , SO _x , etc.) level in the area of the project and to evaluate the potential contamination level increase due to the increased vehicular traffic.	Before construction	GRD	2
8	PR 3 – Waste management	The client will avoid or minimise the generation of hazardous and non-hazardous waste materials and reduce its harmfulness as far as practicable.	The waste areas are decided by the Communes upon Contractor's request. However, a specific Waste Management Plan (WMP) should be developed for the Project and Tender documentation should also clearly require disposing of all waste generated by the project in licensed disposal sites.	Before Constructions	Contractors	1
9	PR 3 – Hazardous materials	Only some general measures for hazardous materials handling and disposal of are included in the ESMP and in the Safety, Health and Environmental Regulations of the Final Design.	A specific Hazardous Materials Management Plan (HMMP) should be developed for the project.	Before Construction	Contractors	1
10	PR 3 – Emergency Response	Emergency situations most commonly associated with road construction and operation include accidents involving single or multiple vehicles, pedestrians, and/or the release of oil or hazardous materials.	A Project Emergency Preparedness and Response Plan should be prepared in coordination with the local community and local emergency responders to provide timely first aid response in the event of accidents.	During Constructions	Contractors	2

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No.	EBRD PR	Key environmental and social issues	Actions to be taken	Deadline / Time frame	Responsibility	Priority¹
11	PR 3 – Noise	Several locations potentially impacted by noise from vehicular traffic have been identified by the EIA and the ESDD. A more detailed Noise Study to verify potential impacted location and define adequate noise barrier protections is recommended before road operation. Furthermore measures to address the negative impacts of noise during the road construction should be implemented.	<p>The GRD should appoint an independent Consultant to assess the baseline noise level in the area of the project and to develop a detailed Noise study of the future road. If needed, adequate barrier should be put in place at sensitive locations before road operation.</p> <p>The Contractor shall develop a noise and vibration plan/procedures to minimise construction noise to meet applicable national and EU requirements particularly at sensitive receptors.</p> <p>The plan as a minimum should include;</p> <ul style="list-style-type: none"> - schedule of the activities, - equipment maintenance - consultation with local community - evaluation the need of additional abatement/mitigation measures, based on the results of the noise monitoring. <p>GRD shall periodically monitor the noise levels at operational sites.</p>	During Construction and before road operation	GRD Contractors	1
12	PR 4 – Transportation	The Contractor will operate moving equipment on public roads and infrastructure. Therefore, the Client will seek to prevent the occurrence of incidents and accidents associated with the operation of such equipment.	<p>A Transportation plan for moving equipment and construction material on public roads should be developed and agreed with relevant local Authorities, including also Hazardous Material Transportation Plan (if applicable).</p> <p>GRD shall appoint an Independent Engineer (i.e. the Supervisor) to monitor the Transportation plan implementation.</p>	Before and during Construction	Contractors Supervisor (to control)	1

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No.	EBRD PR	Key environmental and social issues	Actions to be taken	Deadline / Time frame	Responsibility	Priority¹
13	PR 4 – Irrigation and Drainage	The project crosses several irrigation and drainage channels, which closure may result in an increased risk of flooding or in temporary disruption to irrigation of agricultural land. Channels have been properly assessed and several culverts are foreseen in the Final Design to completely reinstate the irrigation and drainage network. Furthermore, the Contractor is required to temporary support or divert, and subsequently reinstate all irrigation/drainage services and structures.	The Contractor should provide temporary re-establishment of irrigation and drainage canals (through flume pipes or similar) during construction. A Project specific Grievance Mechanism set up by the SEP and the RAP, shall be disclosed and made available to potentially affected farmers.	During Construction	Contractors	1
14	PR 5 – Public Disclosure	The Project has organized public consultations in 2006 and 2010. However, the ESDD showed that most PAPs were not adequately informed about the land acquisition and involuntary resettlement during the previous consultation activities. In addition, there are no requirements for making special provisions for informing / consulting vulnerable groups.	The consultation procedures are provided in both the SEP and the RAP prepared for the Project. GRD shall implement the SEP and the RAP.	Before and during Construction	GRD	1
15	PR 5 – RAP	MI project development has resulted in the involuntary resettlement (both physical and economic displacement) of affected individuals. The Client should, therefore, develop and disclose a RAP, which include a procedure on how to deal with grievances.	GRD shall implement the RAP. GRD shall provide an Initial Monitoring Report on the implementation of the RAP at the time of the Loan condition effectiveness and annually thereafter for three years as part of the Annual Reporting to EBRD.	Before and during Construction	GRD	1
16	PR 5 – Vulnerable groups	The vulnerable groups have not been identified for the project area. The socio-economic survey to, <i>inter alia</i> , identify vulnerable groups and their specific needs is under way and will be completed prior to start of the Project.	GRD shall amend the RAP with the information on vulnerable groups and carry out the measures envisaged for this group of PAPs (as set up by RAP).	Before start of the project	GRD	1

ENVIRONMENTAL AND SOCIAL ACTION PLAN (PR COMPLIANCE)						
No.	EBRD PR	Key environmental and social issues	Actions to be taken	Deadline / Time frame	Responsibility	Priority¹
17	PR 8 – Archaeological Findings	Between km 11 and km 18 of the road runs very close to the Apollonia Archaeological Park, and there is the possibility of archaeological hot-spots along the road route. Furthermore, the road could intersect ancient roads near Mbrostar and on the left bank of the Seman River.	Due to the importance of the involved cultural heritage and the high possibility of related archaeological findings, a specific Archaeological and Cultural Heritage Management Plan and a Chance find procedure should be required of the Contractors.	Before Construction	Supervisor	1
18	PR 8 – Archaeological Heritage Protection	Concerns related to the two service areas foreseen around km 15 and km 18 of the road and the risk of buildings proliferation near the new road (affecting the current view from Apollonia site) were expressed by involved stakeholders (i.e. the Apollonia Site Director)	Further discussion with the Apollonia site Director and relevant Authorities for urban planning and development should be carried out.	Before Construction	GRD	2
19	PR 10 – SEP	The preparation of a Stakeholder Engagement Plan (SEP) is not a requirement under Albanian legislation, and is not practiced by the Client.	The client will identify individuals and groups that may be differentially or disproportionately affected by the project because of their disadvantaged or vulnerable status. The client will also identify how stakeholders may be affected and the extent of the potential (actual or perceived) impacts. A SEP has been prepared as a result of this ESDD, and shall be implemented by the GRD.	Before Construction	GRD	1
20	PR 10 – Public Consultation	There are no requirements in Albanian laws for consultation with PAPs or any special provision for informing/consulting vulnerable people prior and during the expropriation process. Since 2006, two public meetings and one public consultation were organized by the Client to present the Project, its impacts and provide the opportunity for comments. However, PAPs are not sufficiently informed; generally local governments entities and a few representatives of PAPs have participated.	The Client will organize a presentation of the Project route, envisaged expropriation and other impacts in all villages affected by the Project. One to one meetings will be held with all affected households subject to relocation to provide them with the specific information about the extent of expropriation, compensation value, type of assistance to be provided and the grievance mechanism. Provisions for further consultations are elaborated in the SEP.	Before Construction	GRD	1

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No.	EBRD PR	Key environmental and social issues	Actions to be taken	Deadline / Time frame	Responsibility	Priority¹
21	PR 10 – SEP	Most PAPs have not been adequately informed of the consultation activities and did not participate at them. If cultural reasons impede them to participate, adequate channels of information must be identified to ensure all PAPs, especially those whose household is directly affected are all informed of their rights.	A SEP has been prepared to govern meaningful consultation requirement and shall be implemented by GRD.	Before and during Construction	GRD	1
22	PR 5 / PR 10 – Grievance Mechanism	There is no grievance mechanism set in place and communicated to the stakeholders.	A Project specific Grievance Mechanism has been set up by the SEP and the RAP, to which PAPs may apply. The Grievance Mechanism will be adequately communicated and made available for all stakeholders, especially for the PAPs and vulnerable groups.	Before and during Construction	GRD	1