

Environmental and Social Action Plan - Sarichioi

No	Action	Benefits / Reasons and Implementation	Legislative requirement / EBRD performance requirement / Best practice	Investment Needs / Resources / Responsibility	Timetable action to be completed by	Target and evaluation criteria for successful implementation
0	<p>Prepare and submit reports on status of ESAP implementation and environmental, health, safety and social performance, including resolution of grievances associated with the project.</p> <p>The Company will comply with the requirements of the Corporate ESAP.</p>	Continual assessment of EHSS performance against EBRD PRs	EBRD PR1, PR2 and PR10	Internal resource	Annually	<p>Submission of reports on environmental, health and safety, and social (EHSS) performance.</p> <p>These reports will be provided to the Lenders but also made available to stakeholders on request.</p>
1	Comply with all permits and permit conditions as well as results and recommendations of ornithological monitoring reports.	Best practice	Romanian law EBRD PR1	Internal resource	Continuously	Report any violations and consequences.
2	Develop and implement an Environmental, Health and Safety Management System (EMS) in accordance with corporate requirements.	Best practice	EBRD PR1, PR4	Internal resource (or supported by external consultant)	Q1 2014	<p>Development of an EMS.</p> <p>Attainment of ISO 14001 or equivalent.</p> <p>Annual EHS Report to be submitted to the Bank.</p>

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3a	Undertake one-off noise monitoring surveys at sensitive receptors i.e. nearby residences to verify noise levels are acceptable.	Compliance with regulatory requirements	EBRD PR3, PR4	Internal resource (or resourced externally – up to €5000)	Six months following completion	Survey report, including compliance status.
3b	Monitor noise at any residence upon receipt of complaints or request by owner/occupant. Implement mitigation to reduce noise levels to acceptable levels if needed.	Ensure no disturbance of residents	EBRD PR3, PR4	Internal resource (or resourced externally -- up to €3000)	Throughout operation	Report on noise complaints and requests, and on results and mitigation if required.
4a	Appoint qualified Independent Ornithologist Expert (IOE) to develop and/or review/approve methodologies for seasonal bird monitoring and for mortality monitoring for birds and bats. The IOE will implement a formal turbine shut down system or reduce the speed of operation of wind turbines, when significant risks of bird collisions occur. The IOE will be approved by the Lender.	Ensure representative quality data	Best practice PR3	€3000	Approved methodologies to be agreed within three months of Board approval	Report on development/approval status. Annual report to the Lenders, and publishing of a report available to stakeholders on request. The report will also be sent to the Romanian Ornithological Society (SOR) EcoPontica and Tulcea Environmental Protection Agency (EPA).

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4b	Implement biodiversity monitoring programme developed under 4a.	Identify actual impacts on birds (and bats if applicable)	Best practice PR 3	€10000 per year	Seasonal: at least 5 years, continued as required by Environmental Authorisaiton. Mortality: throughout operation of the wind farm	
4c	Appoint qualified independent ornithologist to review results of each year's monitoring, and cumulative data, to determine (a) the need for additional mitigation measures if there are unacceptable impacts, (b) the need for continuing seasonal monitoring for another year.	Evaluate actual impacts, mitigate as needed, plan for future needs	Best practice PR 3	First 2 years: €2000 per year Mortality monitoring: €1000 per year	Seasonal: annually as long as monitoring continues Mortality: annually throughout operation.	Report on monitoring and mortality, and on the ornithologist's recommendations.
4d	If needed based on ornithologist recommendation under 4c, develop and implement mitigation measures to reduce impacts to acceptable levels.	Reduced impacts, if necessary	Best practice PR 3	Not possible to estimate at present	As agreed with IOE	Report on mitigation and implementation.
4e	Within 2 years of the operation of the wind farms, undertake a bird collision assessment, in line with recognized	The collision risk assessment will enable a review of	Lenders requirements	External consultants	Within 2 years of commission-	Report on results of collision risk assessment and

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	international best practice and based on a model as advised by the IOE, and discuss with key stakeholders, inclusive of SOR and regulators. Revise the shutdown system/protocol based on the findings of the collision risk assessment. A report will be provided to the Lenders and a summary of the study published on the internet.	operational and monitoring data and to verify the assessment made in the initial studies. Based on the results of the study, the company will amend an action plan and operational conditions, as far as these are possible.			ing the project	required mitigation measures and changes to monitoring plan if applicable.
4f	Ensure conductor spacing on transmission line is sufficient to prevent electrocution of the largest birds expected to be present, or otherwise appropriate to eliminate the possibility of electrocution.	Reduced mortality	Best practice PR 3	Not possible to estimate at present	Q3 2013	Report on need for modifications.
5	Develop comprehensive waste management plans to include: 1. Procedures for proper handling of all waste generated 2. Methods to verify proper off-site	Minimisation of waste for disposal	Best Practice / EBRD PR 3	Internal resource (provided by contractors)	To be implemented during operation	Waste management plan and audit of implementation.

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	<p>management of related wastes by contractors</p> <p>3. Measures to minimize waste generation and maximise re-use and recycling.</p> <p>4. Waste segregation and designated storage locations</p>					
6	Undertake a health and safety risk assessment of all staff job functions and activities, and implement health and safety action plan covering control measures and work instructions as required.	H&S risks	EBRD PR2, PR 4	Internal resource	July 2012	Risk Assessment.
7	<p>Ensure contractors and staff have:</p> <p>1. An emergency procedure developed.</p> <p>2. Implemented HSE training of staff.</p> <p>3. Access to personal protective equipment and use such equipment.</p>	Contractor management	EBRD PR1, PR 4	Internal resource (and provided by contractors)	July 2012	Contractor and company EHS performance data – accidents and statistics.
8	Develop labour and social policies and incorporate into contractual arrangements with employees and contractors – to include terms of employment, skills, dismissal, discrimination, harassment, violations,	Contractor management	EBRD PR1, PR 4	Internal resource (provided by contractors)	Q3 2012	Employment and social policies.

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	human rights, forced and child labour, wages and social leave/benefits, health & safety and bribery and corruption.					
9	Maintain and further develop Stakeholder Engagement Plan (SEP), including a Grievance Mechanism.	EBRD performance standards	EBRD PR10	A SEP has been developed for use on this project	July 2012	SEP document to be updated every 3 years.
10	Implement the agreed SEP, inform stakeholders of activities and possible impacts, and receive and respond to grievances.	EBRD performance standards	EBRD PR10	Internal resource (appointment of project communications manager)	To be implemented during operation	SEP as amended, grievances and responses to grievances.
11	Develop and implement a decommissioning strategy that includes a plan for minimising environmental impacts during decommissioning.	Best practice	EBRD PR1	Internal resource	At end of the life of wind farm	Decommissioning plan.