



European Bank for Reconstruction and  
Development

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# **KHMELNITSKY SOLID WASTE PROJECT**

Environmental and Social Action Plan





# European Bank for Reconstruction and Development

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## **KHMELNITSKY SOLID WASTE PROJECT**

### Environmental and Social Action Plan

**FINAL PUBLIC**

**PROJECT NO. 70057536**

**OUR REF. NO. 70057536/ESAP**

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# QUALITY CONTROL

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## ENVIRONMENTAL AND SOCIAL ACTION PLAN

No.	Action	Environmental and Social Risks (Liability / Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs and Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation*	Status / Notes
PR1	<b>Assessment and Management of Environmental and Social Impacts and Issues</b>						
1.1	<p>Spetskomuntrans to appoint a Project Implementation Unit (PIU)– The PIU will be responsible for preparing an Annual Environmental and Social Report (AESR). The AESR will report on the status of Environmental and Social Action Plan (ESAP) and Environmental and Social Management Plan (ESMP) implementation.</p> <p>It will also report on Environmental Health, Safety and Social (EHSS) performance and stakeholder engagement activities in line with the Livelihood Restoration Framework (LRF) and Stakeholder Engagement Plan (SEP) and resolution of grievances.</p> <p>Contractors to provide required inputs to the AESR, including reporting on agreed metrics and measures to address any non-conformances with EBRD PRs.</p> <p>PIU to appoint a Supervising Engineer. The Supervising Engineer will supervise the Contractor to ensure that recommendations and requirements as set out in the ESMP and other documentation are applied. The Supervising Engineer will assist in the preparation of the AESR.</p>	Compliance with EBRD Performance Requirements (PRs).	EBRD PR1 to PR10 (excluding PR7 and PR9).	<p>PIU to use their own resources.</p> <p>Contractor to provide required inputs to the AESR, including reporting on the agreed metrics using its own resources.</p>	Annual submission (pre-construction, construction and operation).	Submission of an Annual Environmental and Social Report (AESR) that reports on: Environmental and Social Action Plan (ESAP) and Environmental and Social Mitigation Plan (ESMP) implementation progress, effective EHSS performance, stakeholder engagement activities in line with the Livelihood Restoration Framework (LRF) and Stakeholder Engagement Plan (SEP) and resolution of grievances.	
1.2	<p>PIU- to develop and implement an Environmental, Health and Safety (EHS) Policy and an Environmental and Social Management System (ESMS) for the Project's entire lifecycle.</p> <p>The ESMS must be compliant with international standards (ISO 14001:2015, and ISO 45001:2018), PR1, international conventions signed by Ukraine, national regulation and requirements outlined in the Project key plans (i.e. Environmental and Social Impact Assessment (ESIA), ESAP, ESMP, SEP and LRF).</p> <p>PIU- to elaborate the ESMP, to prepare and implement a detailed ESMP. This ESMP will support the delivery of the Project's EHSS legal compliance and other requirements and commitments.</p>	Optimisation of environmental and social management through a formalised document and associated system.	<ul style="list-style-type: none"> <li>▪ EBRD PR1; and</li> <li>▪ Best practice.</li> </ul>	<p>PIU using their own resources.</p> <p>The resources that will be required to establish the PIU are set out in 1.4.</p> <p>Contractor to deliver applicable parts of the EHSS, and the CESMP using its own resources.</p> <p>PIU to specify in tender documents that the contractor must have an environmental expert and H&amp;S expert with the appropriate competencies.</p>	<p>PIU to implement EHS Policy, ESMS, and detailed ESMP (pre-construction).</p> <p>PIU to prepare OESMP (pre-operation).</p> <p>Contractor to prepare detailed CESMP (pre-construction)</p>	ESMS has been developed and implemented.	

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	<p>The detailed ESMP will include a Construction Environmental and Social Management Plan (CESMP) (to be prepared by a contractor).</p> <p>The ESMP will also include a detailed Operation Environmental and Social Management Plan (OESMP) (to be prepared by PIU).</p> <p>The CESMP and OESMP will both be supported by issue-specific management plans (see the list in the Outline ESMP). These will be developed and implemented by the PIU, and their contractor.</p> <p>Continually review and update, as a minimum annually and with Project and / or legislative changes.</p>						
1.3	<p>PIU – to disclose the ESIA, Non-Technical Summary (NTS), ESAP, ESMP, SEP and LRF.</p> <p>PIU – to implement all mitigation measures identified in the ESIA, as detailed in the ESMP. The ESMP is a live document that should be used to document and monitor the implementation of mitigation measures in the ESIA.</p>	<p>Compliance with EBRD PRs.</p> <p>Ensure that people are informed and consulted about the environmental and social issues related to the project and that grievances are addressed in a transparent and timely manner.</p>	<ul style="list-style-type: none"> <li>▪ EBRD PR1;</li> <li>▪ EBRD PR10;</li> <li>and</li> <li>▪ Best Practice.</li> </ul>	<p>PIU using their own resources.</p>	<p>120-day disclosure period (expected to start in December 2019).</p> <p>Implementation of mitigation measures throughout the Project (pre-construction, construction and operation).</p>	<ul style="list-style-type: none"> <li>▪ ESIA, NTS, ESAP, ESMP, SEP and LRF are disclosed at the start of December 2019.</li> <li>▪ Mitigation measures identified in the ESIA have been implemented throughout Project's entire lifecycle.</li> </ul>	
1.4	<p>PIU – to assign personnel with EHSS management responsibilities, provide training and undertake recruitment as required.</p> <p>PIU – to ensure site level EHSS management responsibilities.</p> <p>PIU – to ensure Supply Chain Policy is put in place.</p>	<p>Clear EHSS management.</p>	<ul style="list-style-type: none"> <li>▪ EBRD PR1;</li> <li>▪ EBRD PR2;</li> <li>and</li> <li>▪ Best practice.</li> </ul>	<p>PIU and using their own resources, including:</p> <ul style="list-style-type: none"> <li>▪ A Recruitment Manager with more than 5 years of experience in similar role and able to oversee a recruiting team, communicate effectively and analyse data to modify and design recruitment strategies.</li> <li>▪ A Supply Chain Manager with more than 5 years of experience in similar role.</li> <li>▪ An Environmental Specialist, familiar with EBRD PRs. Must have experience in managing archaeology, heritage and biodiversity;</li> <li>▪ A Social Specialist familiar with EBRD PRs experienced in the implementation of LRFs;</li> </ul>	<p>Pre-construction.</p>	<ul style="list-style-type: none"> <li>▪ PIU to assign or recruit the required resources.</li> <li>▪ Training for assigned personnel is completed as per training schedule.</li> <li>▪ Supply Chain Policy is developed and implemented.</li> </ul>	

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				<ul style="list-style-type: none"> <li>A Community Liaison Officer (CLO) with appropriate skills and experience to effectively manage the implementation of the SEP; and</li> <li>A H&amp;S Specialists with more than 5 years of experience in similar role. They should have strong communication and organisational skills, be familiar with national and international H&amp;S requirements.</li> </ul>			
1.5	Set-up, maintain and continually review an EHSS Incident Reporting Procedure to maintain records of monitoring, accidents and incidents. The procedure must be overarching, unique and fully integrated into the Project and for contractors located on site.	Management of EHSS accidents and incidents.	<ul style="list-style-type: none"> <li>EBRD PR1, PR4; and</li> <li>Best practice.</li> </ul>	Contractor using its own resources (construction). PIU using their own resources (operation).	Throughout (pre-construction, construction and during operation).	<ul style="list-style-type: none"> <li>EHSS Incident Reporting Procedure is developed.</li> <li>Monthly EHSS Reports are submitted to the PIU by the contractor.</li> <li>Report to EBRD annually in the AESR.</li> </ul>	
1.6	Ensure that all environmental permits are in place at the appropriate stage of development. This should include, but not be limited to operational, building and closure permits.  This should also include obtaining the necessary permits from the Ministry of Environment for the discharge of treated leachate from the proposed leachate treatment.	Legislative compliance.	<ul style="list-style-type: none"> <li>EBRD PR1;</li> <li>EBRD PR4; and</li> <li>Ukrainian permitting regime.</li> </ul>	Contractor using its own resources (construction). PIU using their own resources (operation).	Prior to activities for which permits are required.	Correspondence with regulatory bodies and copies of all applicable permits and certificates are available at the appropriate stage of development.	
1.7	Set up and maintain the Security Management Plan and an Employment Management Plan (including recruitment) which form part of the ESMP.	Compliance with EBRD PRs.	<ul style="list-style-type: none"> <li>EBRD PR1;</li> <li>EBRD PR2; and</li> <li>EBRD PR4.</li> </ul>	Contractor (construction). PIU with key role for Recruitment Manager and security personnel (operation).	Throughout (pre-construction, construction and during operation).	Implementation of mitigation measures outlined in the ESMP.	
1.8	Conduct monthly inspection of contractors' occupational health and safety (OHS) performance.	Ensure contractor adoption of EBRD requirements for OHS.	<ul style="list-style-type: none"> <li>EBRD PR1; and</li> <li>EBRD PR4.</li> </ul>	PIU using their own resources.	Construction.	Report to EBRD annually in the AESR on contractor OHS performance.	
<b>PR2</b>	<b>Labour and Working Conditions</b>						
2.1	Develop Human Resources (HR) policies and procedures to ensure that rights of employees are protected in accordance with the Ukrainian Labour Code 1972 (as amended) and PR2.  HR document to cover all the issues associated with minimum wage, working	Employee awareness about their rights.  Reduced risks associated with labour and grievances of direct employees.	<ul style="list-style-type: none"> <li>EBRD PR2; and</li> <li>Ukrainian Labour Code 1972 (as amended).</li> </ul>	Spetskomuntrans to prepare and implement HR policy.  The PIU will require the contractor to have HR policies that cover the same issues, via requirements set out in the tender documents.	Pre-construction and construction.	<ul style="list-style-type: none"> <li>HR manual developed and all employees have access to it.</li> <li>Regular monthly inspections and audits are conducted.</li> <li>Implementation of mitigation measures outlined in the ESMP.</li> </ul>	

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	hours, paid overtime, equality and non-discrimination, employees' grievances, working condition, access to resources, freedom of collective bargaining.					<ul style="list-style-type: none"> <li>Employee Grievance Procedure and Register is set up and maintained.</li> </ul>	
2.2	Undertake the tender process for the construction works to identify and select contractors, who have the required environmental, social, health and safety performance standards, accidents statistics, management systems and policies. The contractor should also have procedures for supply chain management.	Clear EHSS management. Supply Chain Management.	<ul style="list-style-type: none"> <li>EBRD PR1;</li> <li>EBRD PR2;</li> <li>and</li> <li>EBRD PR4.</li> </ul>	PIU	During contractor selection process (tender).	Tender and contract documentation.	
2.3	<p>Include in tendering documents the requirement for contractors to develop procedures / method statements for the project to manage the EHSS issues and mitigation measures identified including but not limited to the below, adopting international best practice in line with the Ukrainian legislative framework and the EBRD PRs:</p> <ul style="list-style-type: none"> <li>EHSS procedures;</li> <li>Labour, working and worker accommodation conditions;</li> <li>Worker and Community safety and security;</li> <li>Supply chain sustainability;</li> <li>Grievance mechanism;</li> <li>Consultation and information disclosure requirements in line with the SEP.</li> </ul> <p>As part of the selection process, an assessment of EHSS management policies, procedures and management capacities and previous performance should be undertaken.</p>	Minimise EHSS risks and impacts.	<ul style="list-style-type: none"> <li>EBRD PR1;</li> <li>EBRD PR2;</li> <li>and</li> <li>Best Practice.</li> </ul>	PIU	During contractor selection process (tender).	Tender and contract documentation.	.
2.4	Monitor suppliers and ensure clauses on working hours, minimum wage, minimum age, freedom of collective bargaining and equality and non-discrimination are included in procurement documents.	Reduced risks associated with labour and grievances of indirect employees.	<ul style="list-style-type: none"> <li>EBRD PR 2.</li> </ul>	Contractor (construction). Spetskomuntrans (operation).	Pre-construction, construction and operation.	<ul style="list-style-type: none"> <li>Regular monthly inspections and audits (procurement).</li> <li>Implementation of Supply Chain Policy and Procurement Plan.</li> </ul>	
2.5	<p>Implement arrangements to maximise the employment of the local population (as far as possible), taking into account the commitments within the Gender Policy.</p> <p>Develop and implement a Gender Policy for the Project.</p>	Provision of equal opportunities and improving economic prospects of residents.	<ul style="list-style-type: none"> <li>EBRD PR2.</li> </ul>	Spetskomuntrans to develop and implement a Gender Policy PIU to require contractor to adhere to the Gender Policy, and to maximise employment of the local population, via tender requirements	Pre-construction, construction and operation.	<ul style="list-style-type: none"> <li>Employment of local residents is reported in line with the Gender Policy.</li> <li>Report to EBRD annually in the AESR on employment data.</li> <li>Implementation of Gender Policy.</li> </ul>	Local skilled labour is potentially available in the City and villages.

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2.6	Monitoring of labour performance. This include the monitoring of the following aspects: working hours, health, working condition, child and forced labour, and labour concerns and grievances.  PIU to implement the grievance process as per the SEP, and the contractor to implement relevant parts of the SEP.	Reduced risk associated with labour dispute and grievances.	<ul style="list-style-type: none"> <li>EBRD PR2</li> </ul>	PIU and Contractor (pre-construction and construction). Spetskomuntrans (operation).	Pre-construction, construction and operation.	<ul style="list-style-type: none"> <li>PIU to undertake monthly labour inspections and audit.</li> <li>PIU and contractor to implement the grievance mechanism during construction. Spetskomuntrans to implement the grievance mechanism during operation.</li> <li>Report to EBRD annually in the AESR on grievances.</li> </ul>	
<b>PR3</b>	<b>Resource Efficiency and Pollution Prevention and Control</b>						
<i>Air Quality</i>							
3.1	Implement the mitigation measures stated in the ESIA and ESMP (relevant construction phase air quality section).	Minimise adverse air quality effects during the construction phase.	<ul style="list-style-type: none"> <li>EU EIA Directive;</li> <li>EBRD PR3;</li> <li>and</li> <li>Best practice.</li> </ul>	Contractor using its resources and external consultants (e.g. air quality experts as required).	Design and construction.	Implementation of mitigation measures outlined in the CSEMP.	
3.2	Implement the mitigation measures stated in the ESIA and ESMP (relevant operational phase air quality section).	Minimise adverse air quality effects during the operational phase.	<ul style="list-style-type: none"> <li>EU EIA Directive;</li> <li>EBRD PR3;</li> <li>and</li> <li>Best practice.</li> </ul>	Spetskomuntrans.	Operation.	Implementation of mitigation measures outlined in the OESMP.	
<i>Noise and Vibration</i>							
3.3	Implement the mitigation measures stated in the ESIA and ESMP (relevant construction phase noise and vibration section).	Minimise adverse noise and vibration effects during the construction phase.	<ul style="list-style-type: none"> <li>EU EIA Directive;</li> <li>EBRD PR3;</li> <li>and</li> <li>Best practice.</li> </ul>	Contractor using its own resources and external consultants (e.g. noise and vibration experts as required).	Pre-construction and construction.	Implementation of mitigation measures outlined in CESMP.	
3.4	Implement the mitigation measures stated in the ESIA and ESMP (relevant operational phase noise and vibration section).	Minimise adverse noise and vibration effects during the operational phase.	<ul style="list-style-type: none"> <li>EU EIA Directive;</li> <li>EBRD PR3;</li> <li>and</li> <li>Best practice.</li> </ul>	Spetskomuntrans using their own resources.	Operation.	Implementation of mitigation measures outlined in the OESMP.	
<i>Climate Change – Greenhouse Gas (GHG) Emissions</i>							
3.5	Implement the mitigation measures stated in the ESIA and ESMP (relevant construction phase climate change section).	Minimise adverse climate effects during the construction phase.	<ul style="list-style-type: none"> <li>EU EIA Directive;</li> <li>EBRD PR3;</li> <li>and</li> <li>Best practice.</li> </ul>	Contractor using its own resources.	Pre-construction and construction.	<ul style="list-style-type: none"> <li>Implementation of mitigation measures outlined in the CESMP.</li> <li>Contractor to calculate GHG emissions associated with the construction phase of the Project once the detailed design information is available (expanding upon the information in the ESIA). Whilst unlikely due to the</li> </ul>	



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						nature of the Project, should the pre-construction emissions calculations be above 25,000 tonnes of CO <sub>2</sub> , annual reporting will be necessary throughout the construction phase.	
3.6	Implement the mitigation measures stated in the ESIA and ESMP (relevant operational phase climate change section).	Minimise adverse climate effects during the operational phase.	<ul style="list-style-type: none"> <li>EU EIA Directive;</li> <li>EBRD PR3; and</li> <li>Best practice.</li> </ul>	PIU to calculate GHG emissions, Spetskomuntrans to implement OESMP.	Pre-operation and operation.	<ul style="list-style-type: none"> <li>Implementation of mitigation measures as outlined in the OESMP.</li> <li>PIU to calculate GHG emissions associated with the operational phase of the Project once detailed operational information is available (expanding upon the information in the ESIA). Whilst unlikely due to the nature of the Project, should the Project be estimated to produce more than 25,000 tonnes of CO<sub>2</sub> (equivalent annually) the GHG emissions should be reported to EBRD.</li> </ul>	
<i>Surface Water</i>							
3.7	Implement the mitigation measures stated in the ESIA and ESMP (relevant construction phase surface water environment section).	Minimise adverse effects to the water environment during the construction phase.	<ul style="list-style-type: none"> <li>EU EIA Directive;</li> <li>EBRD PR3; and</li> <li>Best practice.</li> </ul>	Contractor using its own resources.	Pre-construction and construction.	Implementation of mitigation measures outlined in the CESMP.	
3.8	Prepare an outline water and wastewater balance and include details of the approved water supply permits. (where applicable).	<p>Prevention of over-burdening of non-potable and potable water supplies.</p> <p>Reduction of water use and wastewater generation.</p> <p>Pollution and discharge prevention.</p>	<ul style="list-style-type: none"> <li>EBRD PR3; and</li> <li>EBRD PR4.</li> </ul>	PIU	Throughout (pre-construction, construction and during operation).	<ul style="list-style-type: none"> <li>Outline water balance demonstrating the adequacy and suitability of the proposed source(s) of water for portable and non-portable water.</li> <li>PIU to calculate the water balance of the Project. Reporting to EBRD is required if the water demand is greater than 5,000m<sup>3</sup> / day. Whilst unlikely due to the nature of the Project, further requirements as per PR3 will be needed if the water demand is greater than 5,000m<sup>3</sup> / day e.g. water balance, continuous improvements, specific water use, benchmarking etc.</li> <li>Details of the water supply permits are available (where applicable).</li> </ul>	
3.9	Implement the mitigation measures stated in the ESIA and ESMP (relevant operational phase surface water environment section).	Minimise adverse effects to the water environment during the operational phase.	<ul style="list-style-type: none"> <li>EU EIA Directive;</li> <li>EBRD PR3; and</li> <li>Best practice.</li> </ul>	Spetskomuntrans	Pre-operation and operation.	<ul style="list-style-type: none"> <li>Implementation of mitigation measures outlined in the OESMP.</li> <li>Preparation and implementation of a Leachate Management Plan.</li> </ul>	
<i>Materials and Waste</i>							

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3.10	Implement the mitigation measures stated in the ESIA and ESMP (relevant construction phase materials and waste section).	Minimise adverse materials and waste effects during the construction phase.  Promote waste management in accordance with the waste hierarchy and the proximity principal.	<ul style="list-style-type: none"> <li>▪ EU EIA Directive;</li> <li>▪ EBRD PR3; and</li> <li>▪ Best practice.</li> </ul>	Contractor using its own resources.	Pre-construction and construction.	Implementation of mitigation measures outlined in the CESMP.		
3.11	Implement the mitigation measures stated in the ESIA and ESMP (relevant operational phase materials and waste section).	Minimise adverse materials and waste effects during the operational phase.  Promote waste management in accordance with the waste hierarchy and the proximity principal.	<ul style="list-style-type: none"> <li>▪ EU EIA Directive;</li> <li>▪ EBRD PR3; and</li> <li>▪ Best practice.</li> </ul>	Spetskomuntrans	Pre-operation and operation.	Implementation of mitigation measures outlined in the OESMP.		
<i>Geology and Hydrogeology</i>								
3.12	Implement the mitigation measures stated in the ESIA and ESMP (relevant construction phase geology and hydrogeology section).	Minimise adverse geology and hydrogeology effects during the construction phase.	<ul style="list-style-type: none"> <li>▪ EU EIA Directive;</li> <li>▪ EU Landfill Directive;</li> <li>▪ EBRD PR3; and</li> <li>▪ Best practice.</li> </ul>	Contractor	Pre-construction and construction.	Implementation of mitigation measures outlined in the CESMP.		
3.13	Implement the mitigation measures stated in the ESIA and ESMP (relevant operational phase geology and hydrogeology section).	Minimise adverse geology and hydrogeology effects during the operational phase.	<ul style="list-style-type: none"> <li>▪ EU EIA Directive;</li> <li>▪ EU Landfill Directive;</li> <li>▪ EBRD PR3; and</li> <li>▪ Best practice.</li> </ul>	Spetskomuntrans	Pre-operation and operation.	<ul style="list-style-type: none"> <li>▪ Implementation of mitigation measures outlined in the OESMP.</li> <li>▪ Preparation and implementation of a leachate management system.</li> </ul>		
3.14	Implement the recommendation measures stated in the Hydrogeological Risk Assessment (HRA).	Minimise adverse effects of the existing and proposed landfills upon hydrogeology and hydraulically connected downgradient surface water resources.	<ul style="list-style-type: none"> <li>▪ EU Landfill Directive;</li> <li>▪ EU Water Framework Directive;</li> <li>▪ EU Groundwater Directive;</li> <li>▪ EBRD PR3; and</li> <li>▪ Best practice.</li> </ul>	PIU and external consultants (e.g. geology and hydrogeology experts as required).	Pre-construction.	<ul style="list-style-type: none"> <li>▪ Implementation of recommendations of the HRA.</li> <li>▪ Review of the HRA to include a quantitative assessment.</li> </ul>		
PR4	<b>Health and Safety</b>							

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4.1	Develop an integrated Occupational Health and Safety (OHS) Plan compliant with national legislation and PR4 with monitoring and management systems.  The same integrated document must be applied to all parties involved in the construction and operation of the Project.	To minimise accidents and incidents and ensure safety of workers and equipment.	<ul style="list-style-type: none"> <li>EBRD PR4; and</li> <li>National H&amp;S legislation.</li> </ul>	PIU (responsible for developing a detailed ESMP prior to the start of construction; also responsible for developing an OESMP prior to the start of operation).  Contractors responsible for developing a CESMP (with associated sub-plans prior to the start of construction).	Construction and operation	<ul style="list-style-type: none"> <li>PIU to have prepared and implement the OHS Plan</li> <li>Operational Health and Safety Management Plan developed and implemented for operation.</li> <li>Report to EBRD annually in the AESR on Plan, OHS performance, including work-hours, lost-time incidents, major accidents, fatalities (including actions taken in response to accidents) – include contractor data separately and combined.</li> </ul>	
4.2	Implementation of safe practices during construction, set out in a CESMP to minimise potential impacts to local communities, and construction workers.	To minimise accidents and incidents during the construction phase.	<ul style="list-style-type: none"> <li>EBRD PR4.</li> </ul>	Contractor	Pre-construction and construction.	<ul style="list-style-type: none"> <li>Develop and implement a CESMP.</li> <li>Report to EBRD annually in the AESR on the CESMP.</li> </ul>	
4.3	Contractor to conduct due diligence investigation for all their security personnel to make sure they have appropriate licensing, experience and training. PIU to audit the Contractors records of investigation.	Prevent conflict between security personnel and local communities.  Prevent potential human rights violations by security personnel.	<ul style="list-style-type: none"> <li>EBRD PR4; and</li> <li>Best practice.</li> </ul>	Contractors to implement, PIU to audit records.	Pre-construction.	<ul style="list-style-type: none"> <li>Due diligence carried out for all new personnel and documents to be audited by PIU on a monthly basis.</li> <li>Report to EBRD annually in the AESR on any incidents involving security personnel.</li> </ul>	
4.4	PIU to prepare an Emergency Preparedness and Response Plan (or equivalent) for each emergency situation and potential accidents in consultation with operators, contractors, sub-contractors, local emergency service providers and control authorities (if required in case of specific types of work).  Continually review and update, as a minimum annually and after any emergencies or accidents.	Preparation for emergency situations and potential accidents are managed.	<ul style="list-style-type: none"> <li>EU EIA Directive;</li> <li>EBRD PR3;</li> <li>EBRD PR4; and</li> <li>Best practice.</li> </ul>	PIU, and their contractor (in liaison with the emergency services).	Pre-construction, construction, and operation.	<ul style="list-style-type: none"> <li>Implementation of mitigation measures outlined in the CESMP and OESMP.</li> <li>Develop and implement an Emergency Preparedness and Response Plan.</li> </ul>	
4.5	Independent review of the Project detailed design to ensure compliance with EU standards and with Best Available Technology (BAT) for landfill design as well as gas collection.	Ensure the safety of workers and the local community.	<ul style="list-style-type: none"> <li>EU EIA Directive;</li> <li>EU Landfill Directive;</li> <li>EBRD PR3;</li> <li>EBRD PR4; and</li> <li>Best practice.</li> </ul>	PIU	Review of detailed designs prior to construction.  Implemented during construction and operation.	<ul style="list-style-type: none"> <li>Independent review of Project detailed design.</li> <li>Implementation of BAT mitigation measures.</li> <li>BAT mitigation measures to be incorporated into the CESMP and OESMP.</li> </ul>	
<b>PR5</b>	<b>Land Acquisition, Involuntary Resettlement and Economic Displacement</b>						
5.1	Ensure that mitigation measures outlined in the Livelihood Restoration Framework (LRF) are implemented during both construction and operation so all impacts on affected	Minimise and mitigate effects on parties who could be affected economically.	<ul style="list-style-type: none"> <li>EBRD PR5; and</li> <li>Best practice.</li> </ul>	PIU and / or external consultants (expertise, as required).	Prior to, during and at completion of construction.	<ul style="list-style-type: none"> <li>Evidence that the mitigation measures outlined in the Livelihood Restoration Framework (LRF) are implemented during both construction and operation.</li> </ul>	

No.	Action	Environmental and Social Risks (Liability / Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs and Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation*	Status / Notes
	parties are mitigated as per the LRF principles.					<ul style="list-style-type: none"> <li>Mitigation measures to be incorporated into the Livelihood Restoration Plan (LRP).</li> </ul>	
5.2	Develop and implement a Livelihood Restoration Plan (LRP) fully in line with the commitments and event sequences defined in the Livelihood Restoration Framework (LRF). Implement the grievance mechanism outlined in SEP.	Mitigation for the risks of land acquisition / compensation.	<ul style="list-style-type: none"> <li>EBRD PR5.</li> </ul>	PIU (with a key role for the CLO).	Pre-construction.	<ul style="list-style-type: none"> <li>Develop and implement the LRP prior to construction.</li> <li>Implement the grievance mechanism.</li> <li>Report to EBRD annually in the AESR on the LRP and grievances.</li> </ul>	
5.3	Independently audit livelihood restoration activities to ensure compliance with EBRD PR5.	Ensure compliance with EBRD requirements.	<ul style="list-style-type: none"> <li>EBRD PR5.</li> </ul>	PIU	After completion of land acquisition (construction and post construction).	Report shall be provided within annual AESR.	
<b>PR6</b>	<b>Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>						
6.1	Implement the mitigation measures stated in the ESIA and ESMP (relevant construction phase biodiversity section).	Conserve and protect habitats, biodiversity and living natural resources during the construction phase.	<ul style="list-style-type: none"> <li>EU EIA Directive;</li> <li>EU Habitats Directive;</li> <li>EU Birds Directive;</li> <li>EBRD PR6; and</li> <li>Best practice.</li> </ul>	Contractor to implement and PIU to undertake environmental supervision.	Pre-construction and construction.	Implementation of mitigation measures outlined in the CESMP.	
6.2	Implement the mitigation measures stated in the ESIA and ESMP (relevant operational phase biodiversity section).	Conserve and protect habitats, biodiversity and living natural resources during the operational phase.	<ul style="list-style-type: none"> <li>EU EIA Directive;</li> <li>EU Habitats Directive;</li> <li>EU Birds Directive;</li> <li>EBRD PR6; and</li> <li>Best practice.</li> </ul>	Spetskomuntrans	During operation.	Implementation of mitigation measures outlined in the OESMP.	
<b>PR7</b>	<b>Indigenous Peoples</b>						
Not applicable to this Project as there are no indigenous peoples involved.							
<b>PR8</b>	<b>Cultural Heritage</b>						
<i>Cultural Heritage and Archaeology</i>							
8.1	Implement the mitigation measures stated in the ESIA and ESMP (cultural heritage)	Minimise adverse cultural heritage effects.	<ul style="list-style-type: none"> <li>EU EIA Directive;</li> </ul>	Contractor	Pre-construction and construction.	Implementation of mitigation measures outlined in the CESMP.	

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	sections). This includes the development of a Chance Find Procedure which will be set out in a Cultural Heritage Management Plan (CHMP).		<ul style="list-style-type: none"> <li>EBRD PR8; and</li> <li>Best Practice.</li> </ul>				
8.2	Set up a Chance Finds Procedure and report 'Chance finds' to the authorities and other relevant institutions to undertake excavation and full archaeological assessment of the finds.	To preserve cultural heritage.	<ul style="list-style-type: none"> <li>EBRD PR8; and</li> <li>Best Practice.</li> </ul>	Contractor	Pre-construction and construction.	<ul style="list-style-type: none"> <li>Develop and implement a Chance Finds Procedure.</li> <li>Report any archaeological findings.</li> </ul>	
<i>Landscape and Visual</i>							
8.3	Implement the mitigation measures stated in the ESIA and ESMP (relevant construction phase landscape and visual section).	Minimise adverse landscape and visual effects during the construction phase.	<ul style="list-style-type: none"> <li>EU EIA Directive;</li> <li>EBRD PR8; and</li> <li>Best Practice.</li> </ul>	Contractor	Pre-construction and construction.	Implementation of mitigation measures outlined in the CESMP.	
8.4	Implement the mitigation measures stated in the ESIA and ESMP (relevant operational landscape and visual quality section).	Minimise adverse landscape and visual effects during the operational phase.	<ul style="list-style-type: none"> <li>EU EIA Directive;</li> <li>EBRD PR8; and</li> <li>Best Practice</li> </ul>	Spetskomuntrans	Pre-operation and operation.	Implementation of mitigation measures outlined in the OESMP.	
<b>PR9</b>	<b>Financial Intermediaries</b>						
Not applicable to this Project as there are no financial intermediaries involved.							
<b>PR10</b>	<b>Information Disclosure and Stakeholder Engagement</b>						
10.1	Disclosure of documents that include the ESIA, a NTS and the ESAP in accordance with requirements for EBRD Category A Projects.  The NTS will provide a Project description, a description of the ESIA process, a summary of the environmental and social effects, mitigation and enhancement measures and the contact details for communications with a link to the SEP / LRF.	EBRD performance requirements.	<ul style="list-style-type: none"> <li>EBRD PR10.</li> </ul>	PIU (with a key role for the CLO) and external consultants (as required).	120-day disclosure period (expected to start in September 2019).	Disclosure of the ESIA, a NTS and the ESAP in the public domain.	
10.2	Implement the SEP and grievance mechanism to ensure a continuous and systematic stakeholder engagement programme throughout the Project.  Ensure that vulnerable people are identified and consulted throughout the project.	Information dissemination and continuous engagement with affected stakeholders.	<ul style="list-style-type: none"> <li>EBRD PR10.</li> </ul>	PIU (with a key role for the CLO).  Spetskomuntrans, once the site is operational	Pre-construction and construction.  Operation	<ul style="list-style-type: none"> <li>Implement the SEP.</li> <li>Implement the grievance mechanism.</li> <li>Report to EBRD annually in the AESR on the stakeholder engagement and grievances.</li> </ul>	

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	<p>Documentation of all stakeholder activities and logging of grievances to inform the annual monitoring report.</p> <p>The SEP should be reviewed and if necessary updated annual or when changes occur in the Project.</p> <p>The SEP and grievance mechanism will be updated once the Project becomes operational.</p>						
10.3	Appoint a Community Liaison Officer (CLO) with appropriate skills and experience to effectively manage the implementation of the SEP.	Liaison with local communities and authorities on a regular basis, analyse interaction and provide updates and practical recommendations.	<ul style="list-style-type: none"> <li>▪ EBRD PR 1; and</li> <li>▪ EBRD PR 10.</li> </ul>	PIU	Construction and operation.	Appointment of CLO.	
10.4	Consult with all affected land owners and users on land acquisition in accordance with the LRF and subsequent LRP.	Reduced risk associated with land acquisition.	<ul style="list-style-type: none"> <li>▪ EBRD PR 1;</li> <li>▪ EBRD PR5; and</li> <li>▪ EBRD PR10.</li> </ul>	PIU (with a key role for the CLO).	Pre-construction, construction and operation.	<ul style="list-style-type: none"> <li>▪ Regular consultation in accordance with the LRF and subsequent LRP.</li> <li>▪ Report to EBRD annually in the AESR on the LRF and subsequent LRP processes.</li> </ul>	

\*Note: All documents referenced in the ESAP should be provided to EBRD for information purposes once developed and when updated.



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