

APPENDIX A: ENVIRONMENTAL & SOCIAL ACTION PLAN

No	EBRD PR/ legislative requirement/ best practice	Environmental/Social Action	Environmental/ Social Risks/Benefits	Investment Needs/ Resources/ Responsibility	Target Date by year end/ Project Phase	Target/ evaluation criteria for successful implementation
1.	PROJECT PLANNING & PROCUREMENT PHASE (some actions will carry forward into Construction Stage)					
1.1	PR1: Environmental and Social Appraisal and Management	<p>Commitments Register:</p> <p>Develop a Commitments Register, to document all design, construction and operation related mitigation measures cited in the EIA, NTS, LARF/LRF, BMP and SEP documentation, and identify how the commitment is addressed, and which party (e.g. PESR, contractor, third parties) is responsible. This Register should be maintained throughout the operation phase.</p>	All environmental and social issues and impacts are appropriately addressed.	<p>Responsibility: PESR/ Consultant</p> <p>Resource: In house</p>	Prior to completion of Detailed Design	<p>Commitments Register available.</p> <p>Report in Annual Environmental & Social Report (AESR) to EBRD</p>
1.2	PR1: Environmental and Social Appraisal and Management	<p>Design Check:</p> <p>Confirm that design-related mitigation measures recommended in EIA and NTS (e.g. drainage network for surface water, erosion protection measures on drainage outlets, oil interceptors on discharge pipes, planting programme for slope stability, animal passes), crossings to address severance effects, are implemented in detailed design.</p>	All environmental and social issues and impacts are addressed where possible by design.	<p>Responsibility: PESR/ Consultant</p> <p>Resource: In house</p>	Prior to completion of Detailed Design	<p>Checklist of design issues from Commitments Register</p> <p>Report in AESR to EBRD</p>
1.3	PR1: Environmental and Social Appraisal and Management	<p>Environmental & Social Management System:</p> <p>Establish and implement an Environmental & Social Management System for the construction of the road in line with good international practice which should include (but not be limited to):</p> <p>Construction Environmental & Social Management Plan (CESMP) (which should include mitigation for specific issues including; minimising disturbance to protected areas, flora & fauna, dust/noise, groundwater & surface water, community relations, access, constraints, buffer zones, no-go zones, seasonal working restrictions in specific areas, etc). Plan should include specific responsibilities;</p> <p>Other Plans listed in the EIA documentation should be developed, and incorporated into the above CESMP as appropriate, including;</p>	All environmental and social issues and impacts are appropriately addressed.	<p>Responsibility: PESR to oversee. Some plans to be developed by others (e.g. contractor, ecologists, etc)</p> <p>Resource: PESR In house, Contractor may need to designate EHSS resources</p>	CESMP to be developed by Contractor before construction and implemented during Construction Phase (before construction commences Plan must be approved by the Engineer and PESR.)	<p>Management Plans documented</p> <p>Provide updates on implementation in AESR to EBRD</p>

No	EBRD PR/ legislative requirement/ best practice	Environmental/Social Action	Environmental/ Social Risks/Benefits	Investment Needs/ Resources/ Responsibility	Target Date by year end/ Project Phase	Target/ evaluation criteria for successful implementation
		<ul style="list-style-type: none"> • Dust Management Plan; • Construction Traffic Management Plan; • Noise Control Plan (which will set out the safe exposure limits (duration and intensity) for workers in relation to noise, in accordance with national or EU requirements); • Biodiversity Management Plan (BMP) (see below) • Biodiversity Offsetting Management Plan (BOMP) (if deemed necessary as a result of Critical Habitats Assessment, see below); • Erosion Control Plan; • Spill Response Plan; • River Crossings Plan; • Waste Management Plan; • Cultural Monument Protection Plan; • Chance Finds Procedure (see below); • Health & Safety Plan (see below); • Emergency Preparedness and Response Plan (see below); • Workforce Management Plan; 				
1.4	PR1: Environmental and Social Appraisal and Management	<p>Monitoring Plans:</p> <p>Environmental and social monitoring measures to be developed as part of the project ESMS. Plans should include specific responsibilities.</p> <p>Key issues to be monitored during construction include: air emissions, construction noise levels, land take, effects of land and access restrictions on agricultural workers, habitat clearance, effects on biodiversity and protected areas, water quality. PESR will insert these requirements into the tender documents in order to have the Contractor implement them.</p> <p>The ESMS should include the public disclosure of a summary of the key monitoring results. The monitoring plans must describe community relations monitoring parameters and</p>	All environmental and social effects are appropriately monitored.	<p>Responsibility: PESR to oversee and ensure actioned. Contractor is responsible to organise construction phase monitoring. Some actions may be contracted out to third parties (e.g. monitoring consultants,</p>	<p>The Contractor shall prepare Construction Phase Monitoring Plans before construction begins.</p> <p>All baseline monitoring (e.g. air, noise, water, etc) to be available</p>	<p>Documented Monitoring Plans exist and updated</p> <p>Provide updates on implementation in AESR to EBRD</p>

No	EBRD PR/ legislative requirement/ best practice	Environmental/Social Action	Environmental/ Social Risks/Benefits	Investment Needs/ Resources/ Responsibility	Target Date by year end/ Project Phase	Target/ evaluation criteria for successful implementation
		<p>processes, particularly in relation to management of issues raised by the local community.</p> <p>PESR to ensure that Monitoring Plans are implemented, and that the responsibility for each area of monitoring is clear, noting that the Contractor is likely to have crucial role in its implementation.</p>		<p>ecologists, etc)</p> <p>Resource: As offered by the Contractor in the BoQ</p>	<p>before construction.</p> <p>Monitoring Plan must be approved by the Engineer and PESR</p>	
1.5	PR1: Environmental and Social Appraisal and Management	<p>Managing & Monitoring Contractor Performance:</p> <p>PESR to set up internal mechanisms to monitor and review the environmental and social performance of the contractor</p>	Monitoring compliance with ESAP and Management Plans to minimise risk and maximise benefits	<p>Responsibility: PESR</p> <p>Resource: Designated PESR in-house resources</p>	Mechanisms in place before construction begins.	<p>Internal monitoring mechanism in place.</p> <p>Report in AESR to EBRD</p>
1.6	PR1: Environmental and Social Appraisal and Management	<p>Obtain & Comply with Permits & Approvals:</p> <p>Obtain, comply and maintain all necessary environmental, social and health and safety permits/approvals for the works, including all necessary Construction Permits. Include approvals for quarries, borrow pits, waste rock disposal sites and solid waste disposal.</p> <p>Include all necessary licenses and approvals for works within the Drenovo Gorge as required, including but not limited to those required under Art 77 on the Law on Nature protection (Nos 67/04, 14/06 and 84/07).</p>	Compliance with national and EBRD requirements	<p>Responsibility: PESR and Contractor. PESR to ensure that Contractor gains all construction – related approvals.</p> <p>Resource: Designated PESR in-house resources, and Contractor resources</p>	Obtain and comply as required pre-construction and as required during construction	<p>Permit approvals from Competent Authorities</p> <p>Commitment Register</p> <p>Report in AESR to EBRD</p>
1.7	PR2: Labour and Working Conditions	<p>Occupational Health & Safety:</p> <p>Contractor to establish a Health & Safety Plan as part of an OHS management system in line with OHSAS 18001 and the IFC General EHS Guidelines (2007). The contractual conditions are to ensure all sub-contractors are also required to follow the Health & Safety Plan and the OHS management system. Particular focus shall be given to;</p> <ul style="list-style-type: none"> • Working at heights and fall prevention; • The movement of plant / vehicles and general traffic 	Improved health and safety performance and safe working environment for workforce (permanent & contract/ contractor & sub-contractor).	<p>Responsibility: Contractor</p> <p>Resources: Designated EHSS Manager</p>	Implemented during Construction Phase; before construction commences Plan must be approved.	<p>Documented Health & Safety Plan</p> <p>Safety statistics and data</p> <p>Provide updates in AESR on implementation to EBRD.</p>

No	EBRD PR/ legislative requirement/ best practice	Environmental/Social Action	Environmental/ Social Risks/Benefits	Investment Needs/ Resources/ Responsibility	Target Date by year end/ Project Phase	Target/ evaluation criteria for successful implementation
		management arrangements; <ul style="list-style-type: none"> • Ground disturbance and supports to prevent unintended ground movement and collapse; • The controls to identify and prevent contact with above ground electrical cables and supporting infrastructure; and • The system used to approve, record and monitor road/site worthiness of mobile plant and vehicles. 				
1.8	PR2: Labour and Working Conditions	Procurement: Contracting method and tender documents for the construction of the road to meet EBRD's procurement policies (i.e. tender documents based on contracts should include PR 2 provisions).	Compliance with EBRD requirements on standards and conditions for workforce	Responsibility: PESR Resource: PESR in-house procurement resources	Pre-Construction	PR2 compliant tender/contracts established. Provide updates on implementation in AESR to EBRD
1.9	PR4: Community Health, Safety and Security	Road Safety Audit: Design will be subject to a Road Safety Audit according to the provisions of EU Directive 2008/96/EC, with mandatory inclusion of economically viable safety improvements into the design phase. Road Safety Audit will be conducted by certified auditor. Where the road safety auditors recommendations are not implemented, the reason why each recommendation has been declined needs to be confirmed to the Bank. A road safety inspection shall be carried out on roads once operational, and if appropriate action plans developed for low cost remedial road safety measures. Include a compilation of accident statistics for existing road in previous 5-10 years to allow future comparisons to be made.	Reduction of accident risk	Responsibility: PESR/Consultant Resources: TC resources to be provided by EBRD.	Design Phase	Documented Road Safety Audit Report in AESR to EBRD
1.10	PR4: Community Health, Safety and Security	Emergency Preparedness & Response Plan (EPRP) Develop an Emergency Preparedness & Response Plan (EPRP) .	Ensuring adequate emergency response	Responsibility: Contractor to prepare , PESR to review for adequacy Resources: Contractor's resources	Before Construction	Documented Emergency Preparedness & Response Plan Report in AESR to EBRD

No	EBRD PR/ legislative requirement/ best practice	Environmental/Social Action	Environmental/ Social Risks/Benefits	Investment Needs/ Resources/ Responsibility	Target Date by year end/ Project Phase	Target/ evaluation criteria for successful implementation
1.11 (HP)	PR5: Land Acquisition, Involuntary Resettlement and Economic Displacement	<p>Livelihoods Restoration Framework:</p> <p>Develop a Livelihoods Restoration Framework (LRF) to meet the requirements of PR5, using the LARF as a basis, and using information from the socio-economic survey on local community use of lands, and likely livelihood impacts, and once consultations have been held with local land owners and users.</p> <p>Use the results of the socio-economic survey to confirm whether documents or consultations on land acquisition and livelihood restoration need to be provided in additional languages.</p> <p>Include all commitments as set out in PR5 and LARF, including but not limited to the following commitments;</p> <ul style="list-style-type: none"> • The valuation of assets will not take into account asset depreciation; • Compensation for expropriation of land will take into consideration interruption to economic activities, as well as loss of assets, loss of income or loss of livelihoods resulting from land acquisition; • Cash compensation will be made for assets on the land (e.g. agricultural buildings, fixed assets and equipment such as irrigation systems) and will be at least equal to replacement costs, not including depreciation; • The value of compensation for assets and facilities will be calculated at full replacement cost, i.e. the market value of the assets plus transaction costs. In applying this method of valuation, depreciation of structures and assets will not be taken into account; • Where compensation is provided to users of land owned by the state, for investments made on the land, this compensation will be based on the full replacement cost of these investments. Depreciation of structures and assets will not be taken into account; • Compensation will be provided prior to land or 	<p>Compliance with EBRD Requirements/National requirements</p> <p>Compensation for economic displacement and livelihood impacts related to land acquisition and access restrictions</p>	<p>Responsibility: PESR</p> <p>Resources: Designated internal resources, or consultants</p>	Before Construction Phase	<p>Documented and implemented LRF.</p> <p>Submitted to EBRD for review when prepared.</p> <p>Report in AESR to EBRD.</p>

No	EBRD PR/ legislative requirement/ best practice	Environmental/Social Action	Environmental/ Social Risks/Benefits	Investment Needs/ Resources/ Responsibility	Target Date by year end/ Project Phase	Target/ evaluation criteria for successful implementation
		assets being acquired.				
1.12 (HP)	PR5: Land Acquisition, Involuntary Resettlement and Economic Displacement	<p>Consultations on Land Acquisition</p> <p>Hold consultations with affected parties regarding compensation for land expropriation, loss of access and restoration of livelihoods, in accordance with the SEP and LRF.</p>	Managing of risks and impacts on affected communities	<p>Responsibility: PESR,</p> <p>Resources: Designated internal resources or consultants</p>	Before construction phase	<p>Information disseminated, documented in updated SEP.</p> <p>Report in AESR to EBRD</p>
1.13 (HP)	<p>PR6: Biodiversity Conservation and Sustainable Management of Living Resources</p> <p>EU Habitats Directive</p>	<p>Critical Habitats Assessment</p> <p><i>Note: this action is of critical importance and should be completed as soon as possible and publically disclosed.</i></p> <p>Conduct a Critical Habitats Assessment of the areas in the Drenovo Gorge which are affected by the Project, focusing on:</p> <ul style="list-style-type: none"> Annex I Priority Habitat: dry grass pseudo steppes; Likely habitats of endemic snail (<i>Carinigera drenovoensis</i>); Chasmophyte vegetation focusing on the relict fern communities (<i>Adiantum capillus-veneris</i>, <i>Molinia caerulea</i>, <i>Stachys Iva</i>, etc. Nesting and foraging areas for Egyptian Vulture; Annex I Priority Habitats to the north of Drenovo Interchange, which will be affected by the alignment adjoining the section under consideration by EBRD. <p>Assessment to be conducted according to terms of reference agreed with EBRD, and to include:</p> <ul style="list-style-type: none"> location mapping of habitats and species distribution; information on endemism and wider distribution in Macedonia; assessment of Project impacts relating to construction and operation; consideration of ecosystem services and traditional 	<p>Ensuring no net loss of natural habitats and adequate protection of critical habitats.</p> <p>Demonstrating the lack of technically and economically feasible alternatives.</p>	<p>Responsibility: PESR</p> <p>Resources: Adequate resources to be identified and allocated by PESR.</p>	<p>To begin asap (especially in order to allow Egyptian Vulture nests and seasonal foraging areas to be identified).</p> <p>To be completed before construction in time to allow conditions (including scheduling and constraint zones) to be placed on construction phase.</p>	<p>Documented Critical Habitats Assessment which meets conditions of PR6, disclosed publically.</p> <p>Results fed into design of Biodiversity Management Plan and, where applicable, Biodiversity Offsetting Plan.</p> <p>Submitted to EBRD for review and approval prior to its disclosure.</p>

No	EBRD PR/ legislative requirement/ best practice	Environmental/Social Action	Environmental/ Social Risks/Benefits	Investment Needs/ Resources/ Responsibility	Target Date by year end/ Project Phase	Target/ evaluation criteria for successful implementation
		<p>management of habitats; and</p> <ul style="list-style-type: none"> recommendations on avoidance, mitigation and offsetting; further documentation of the alternatives assessment from a biodiversity perspective (see 1.14 below). <p>Assessment to include recognised experts on the habitats and species at risk, and to be publically disclosed when complete.</p> <p>As part of the CHA, prepare an updated discussion on the assessment of alternatives from a biodiversity perspective. This will examine why it was not feasible to avoid:</p> <ul style="list-style-type: none"> Drenovo Gorge Protected Area (including Endemic snail (<i>Carinigera drenovoensis</i>) habitats; and Chasmophyte vegetation focusing on the relict fern communities (<i>Adiantum capillus-veneris</i>, <i>Molinia caerulea</i>, <i>Stachys Iva</i>, etc); and nesting and foraging areas of Egyptian Vulture; Annex I Priority Habitat: dry grass pseudo steppes; <p>It will include a review of the selected alternative from a biodiversity perspective and present more information to support selection.</p>				
1.14	<p>PR6: Biodiversity Conservation and Sustainable Management of Living Resources</p> <p>EU Habitats Directive</p>	<p>Biodiversity Management Plan</p> <p>Develop Biodiversity Management Plan (BMP) based on results of EIA and Critical Habitats Assessment. Plan to include measures to protect specific vulnerable or sensitive habitats and species, and maintain ecosystem services (where relevant). Where appropriate, measures should include avoidance (no-go areas to the contractor), seasonal working (e.g. to avoid nesting of vulnerable birds species), pre-construction relocation of vegetation or fauna, rehabilitation of damaged habitats, and offsetting. Plan to include supervision and monitoring by appropriate and recognised ecological experts.</p> <p>Plan to be developed with significant independent expert technical input from ecologists familiar with the habitats and species at risk, and where appropriate, with assistance from local communities in relation to traditional management of</p>	<p>Ensuring no net loss of natural habitats and adequate protection of critical habitats</p>	<p>Responsibility: PESR to oversee. Actions will be delegated to Contractor, or subcontractors) as defined in Tender documents but Independent biodiversity specialists will need to be appointed to prepare the Plan</p>	<p>As soon as possible. Before construction begins, in time to allow conditions to be included in construction contract requirements.</p>	<p>EBRD approval of the proposed independent biodiversity specialists.</p> <p>Plan complete and disclosed publically.</p> <p>Submitted to EBRD for review and approval prior to Construction commencing.</p> <p>Reports in AESR to EBRD.</p>

No	EBRD PR/ legislative requirement/ best practice	Environmental/Social Action	Environmental/ Social Risks/Benefits	Investment Needs/ Resources/ Responsibility	Target Date by year end/ Project Phase	Target/ evaluation criteria for successful implementation
		<p>habitats.</p> <p>Plan to include relocation/re-planting (or distribution to local population) of vegetation which is removed, this will be either offered to the local population.</p> <p>Plan to include procedures to safely remove and prevent spreading of noxious and invasive plants, and to prevent release or introduction of alien (non-native) species during construction.</p> <p>Contractor to assign resources for the training of staff in the BMP requirements and provisions for compliance monitoring of the implementation of the plan.</p>		<p>Resources: Adequate resources to be identified and allocated by PESR/Contractor.</p>		
1.15	PR6: Biodiversity Conservation and Sustainable Management of Living Resources	<p>Biodiversity Offsetting Management Plan</p> <p><i>If the Critical Habitats Assessment identifies that offsets are needed, a Biodiversity Offsetting Management Plan (BOMP) to be developed to detail how areas of natural and critical habitat will be offset. Plan to detail offset locations and other management, protection or awareness measures. Plan to include an implementation schedule and costs, as well as an allocation of responsibilities. BOMP to be developed by independent experts in conjunction with appropriate stakeholders, including expert ecologists, competent authority, local communities, etc.</i></p> <p>Plan to include monitoring and reporting.</p>	Compliance with PR6 and EU Habitats Directive	<p>Responsibility: PESR to oversee. Actions may be delegated to others (e.g. Contractor, subcontractors, etc)</p> <p>Resources: Adequate resources to be identified and allocated by PESR/Contractor</p>	<p>Plan to be developed as soon as possible.</p> <p>To be complete before construction begins, to allow pre-construction actions to be taken.</p>	<p>EBRD approval of the proposed independent biodiversity specialists.</p> <p>Plan complete and disclosed publicly.</p> <p>Submitted to EBRD for review and approval prior to Construction commencing.</p> <p>Reports in AESR to EBRD.</p>
1.16	PR8: Cultural Heritage	<p>Cultural Heritage Consultation and Protection Measures:</p> <p>Consult with the Ministry of Culture regarding suitable actions to be taken during construction phase, to prevent damage to the WWI Monument of Culture and its setting, and to conduct suitable monitoring of the contractor and of the monument during construction.</p>	Minimising risks to WWI monument	<p>Responsibility: PESR, Contractor</p> <p>Resources: Internal EHSS resources, or Contractor</p>	Consultation prior to construction commencing; actions identified during consultation should be implemented during Construction Phase	<p>Approvals from Ministry of Culture for Protection Measures</p> <p>Report in AESR to EBRD</p>

No	EBRD PR/ legislative requirement/ best practice	Environmental/Social Action	Environmental/ Social Risks/Benefits	Investment Needs/ Resources/ Responsibility	Target Date by year end/ Project Phase	Target/ evaluation criteria for successful implementation
1.17	PR8: Cultural Heritage	<p>Protection of Landscape Features of Drenovo Gorge</p> <p>Insert into contract documents a prohibition from making any excavations, quarrying or disposal of waste material or spoil in Drenovo Gorge Protected Area, other than in approved road corridor and related cuttings and embankments, in order to preserve landscape features as far as possible, and prevent unnecessary adverse effects on landscape.</p>	Minimising risks to topographical and landscape resources in Drenovo gorge	<p>Responsibility: PESR to commission and supervise, Contractor to implement</p> <p>Resources: Contractor</p>	Tender development stage / Construction phase	Clause and constraint maps inserted into tender documentation
1.18	PR10: Information Disclosure and Stakeholder Engagement	<p>Stakeholder Engagement and Disclosure of Project Information:</p> <p>Implement the SEP, and update as necessary. PESR to ensure that Contractor is involved in engagement with stakeholders and implements appropriate parts of SEP. When available, publicise design information on road, including information on which access roads will be severed or blocked, either during construction or permanently at junctions. Include information on construction schedule. Information to be published in villages in project area.</p>	Management of risks and impacts on affected communities.	<p>Responsibility: PESR, Contractor</p> <p>Resources: Internal resources</p>	Before Construction Phase – continue during construction and operation	<p>Information disseminated, documented in updated SEP.</p> <p>Grievances</p> <p>Report in AESR to EBRD</p>
1.19	PR10: Information Disclosure and Stakeholder Engagement	<p>Community Road Safety Awareness</p> <p>Develop and implement a road safety awareness and education programme for use with local communities. Programme to address construction and operation phases.</p>	Minimising accidents from road traffic	<p>Responsibility: PESR and Contractor</p> <p>Resources: Designated internal resources, or contractors;</p>	Before Construction Phase commences and during construction	<p>Awareness materials developed.</p> <p>Implementation plan developed.</p>
2	PROJECT CONSTRUCTION PHASE) (some actions will carry forward into Operation phase)					
2.1	PR2: Labour and Working Conditions	<p>HR Policies: HR Policies must be prepared and implemented by the Contractor: these shall include provisions to prohibit use of child labour and forced labour, and will include rights for non-employee workers (in line with ILO conventions and EBRD requirements).</p> <p>The Policies will include a grievance mechanism for workers (& their organisations if applicable e.g. sub-contractors) in-line with PR2 Para.18) to enable individuals/groups to raise reasonable workplace concerns.</p> <p>The Policies will include a Local Workforce Recruitment &</p>	<p>Effective HR & workforce management.</p> <p>Improved HR and workforce management</p> <p>Improved employer-worker relationship</p>	<p>Responsibility: Contractor</p> <p>Resource: HR resources</p>	By Construction commencement	<p>Documented and implemented HR policies and Grievance Mechanism.</p> <p>Compliance/audit reports</p> <p>Report in AESR to EBRD</p>

No	EBRD PR/ legislative requirement/ best practice	Environmental/Social Action	Environmental/ Social Risks/Benefits	Investment Needs/ Resources/ Responsibility	Target Date by year end/ Project Phase	Target/ evaluation criteria for successful implementation
		Management Plan which addresses i) advertising all jobs locally, ii) encouraging and attracting local workforce to apply for jobs, and iii) of prioritising the hire of local workforce where reasonable and practical.	Local economic benefits			
2.2	PR2: Labour and Working Conditions 'Workers' accommodation processes and standards: A guidance note by IFC and EBRD: August 2009.'	Workforce Accommodation: Worker accommodation to be provided to comply as a minimum with the guidance: 'Workers' accommodation processes and standards: A guidance note by IFC and EBRD: August 2009.'	Good workforce welfare and employer-worker relationship	Responsibility: Contractor Resource: EHSS resources. Cost of accommodation included in contract price	Construction Phase	Worker accommodation established to EBRD standards Audit report Report in AESR to EBRD
2.3	PR2: Labour and Working Conditions	Workforce Conduct/General Management: Contractor will implement measures to manage potential impacts of influx of workers into the local area including general measures, health surveillance, code of conduct for workers, etc – this shall be proportional to the numbers of workers required by the Project.	Good relations with local community and reduce risk of community tensions. Manage reputational risk.	Responsibility: Contractor Resources: HR & EHSS Resources	Construction Phase	Documented & implemented Code of Conduct. Update on community complaints regarding code of conduct of workers should be included in AESR to EBRD.
2.4	PR 8: Cultural Heritage	(Archaeological & Cultural Heritage Resources) Chance Finds Procedure: Establish Chance Finds Procedure for the construction period (however anticipated to be low risk of chance finds along the route.)	Preservation of and minimising risks to archaeological remains.	Responsibility: Contractor Resources: ESHS Resources	Construction Phase	Documented Procedure. Report on progress in AESR to EBRD
3.	PROJECT OPERATIONAL PHASE (some actions above will be carried forward into this phase – e.g. OESMP)					
3.1	PR 1: Environmental and Social Appraisal and Management	Obtain & Comply with Permits & Approvals: Obtain, comply and maintain all necessary Environmental, Social, and Health & Safety permits/approvals for the Operation of the Project Road.	Compliance with legal and EBRD requirements.	Responsibility: PESR Resources: Designated PESR ESHS Resources	Operational Phase	Approval of the Permit(s) by Competent Ministry/ Authority.

No	EBRD PR/ legislative requirement/ best practice	Environmental/Social Action	Environmental/ Social Risks/Benefits	Investment Needs/ Resources/ Responsibility	Target Date by year end/ Project Phase	Target/ evaluation criteria for successful implementation
3.2	PR 1: Environmental and Social Appraisal and Management	<p>Environmental & Social Management System:</p> <p>Establish and implement an Environmental & Social Management System for the operation of the road which should include (but not be limited to):</p> <p>Operational Environmental & Social Management Plan (OESMP) (which should address issues such as pollution and run off control, monitoring of noise and air quality, traffic safety, emergency response);</p>	All environmental and social issues and impacts are appropriately addressed.	Responsibility: PESR. Resource: PESR In house	OESMP to be developed before road opens and implemented during operation, implementation will continue through operation phase	Management Plan documented Provide updates on implementation in AESR to EBRD
3.3	PR1: Environmental and Social Appraisal and Management	<p>Monitoring Plans:</p> <p>Environmental and social monitoring measures to be developed as part of the project ESMS. Plans should include specific responsibilities.</p> <p>Key issues to be monitored during operation include: noise at sensitive habitats, air quality along road corridor, effects on protected areas, downstream water quality.</p> <p>The ESMS should include the public disclosure of a summary of the key monitoring results. The monitoring plans must describe community relations monitoring parameters and processes, particularly in relation to management of issues raised by the local community.</p>	All environmental and social effects are appropriately monitored.	<p>Responsibility: PESR to oversee. Some actions may be delegated to third parties (e.g. monitoring consultants, ecologists, etc)</p> <p>Resource: PESR to develop monitoring budget.</p>	Plan to be developed prior to operation commencing, will continue into Operation phase	Documented Monitoring Plans exist and updated Provide updates on implementation in AESR to EBRD

HP = high priority actions