



Annex 2: Environmental and Social Action Plan (ESAP)

No	EBRD PR/ legislative req./ 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	PR1: Assessment and Management of Environmental and Social Impacts and Issues	<p>Commitments Register:</p> <p>Develop a Commitments Register, to document all design, construction and operation related mitigation measures cited in the EIA, Environmental Elaborates, NTS, LARF and SEP documentation, and identify how the commitment is addressed, and which party (e.g. PESR, Contractor, third parties etc.) is responsible. This Register should be maintained throughout the construction and operations phases. It should be provided to Contractor.</p>	All environmental and social issues and impacts are appropriately addressed.	<p><i>Responsibility:</i> PESR/ Consultant</p> <p><i>Resources:</i> 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>
2	PR1: Assessment and Management of Environmental and Social Impacts and Issues	<p>Environmental & Social Management System (ESMS):</p> <p>Establish and implement an Environmental & Social Management System for the <u>construction and operation</u> 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 natural habitats, working in river channels, prevention of pollution to watercourses, control of dust/noise, community relations, access arrangements, constraints, buffer zones, spoil disposal, seasonal working restrictions in specific areas, rehabilitation of land, chance finds procedures, emergency preparedness and response plan, erosion control, spill response, health and safety plan, workforce management plan, management of hazardous materials and measures to prevent exposure to the community etc.). Plan should list the specific responsibilities.</p> <p>Operational Environmental & Social Management Plan (OESMP) (which should address issues such as pollution and run off control, use and maintenance of oil interceptors, monitoring of noise and air quality, traffic safety, emergency response). OESMP to include requirement for regular removal of food, waste, animal carcasses, etc. from roads, in order to reduce the attraction of scavengers.</p>	All environmental and social issues and impacts are appropriately addressed.	<p><i>Responsibility:</i> PESR to oversee. CESMP to be developed by Contractor and approved by supervising engineer. PESR responsible for OESMP.</p> <p><i>Resources:</i> PESR In house, Contractor may need to designate EHSS resources for CESMP.</p>	CESMP to be developed by Contractor before construction and implemented during Construction Phase (before construction commences Plan must be approved by the PIU/Supervising Engineer and PESR.) OESMP to be developed prior to operation commencing, will continue into Operation Phase	<p>Management Plans documented.</p> <p>Provide updates on implementation in AESR to EBRD.</p>



<p>3</p>	<p>PR1: Assessment and Management of Environmental and Social Impacts and Issues</p>	<p>Monitoring Plans:</p> <p>Pre-construction, construction and operational environmental and social monitoring measures to be developed as part of the Project ESMS (see Action 2) and contained within the CESMP & OESMP (as relevant).</p> <p>Pre-construction Monitoring actions should include (but not be limited to) the following:</p> <ul style="list-style-type: none"> Levels of noise and air quality (e.g. including but not limited to NO_x, PM₁₀, PM_{2.5}) to be measured at representative roadside receptors; Monitoring as required under the LARF; Water quality (turbidity and dissolved oxygen) in the Bregalnica at a point around 200 m downstream of the construction works. <p>PESR will insert these pre-construction requirements into the tender documents in order to have the Contractor implement them, as soon as Contractor is engaged, but before construction works begin.</p> <p>Construction Monitoring actions should include (but not be limited to) the following:</p> <ul style="list-style-type: none"> Contractor to keep record of road kill, separately for new corridor and existing corridor; Watching brief to identify cultural heritage resources discovered during excavations; Levels of noise and air quality (e.g. including but not limited to NO_x, PM₁₀) to be measured at representative roadside receptors; Water quality (turbidity and dissolved oxygen) in the Bregalnica at a point around 200 m downstream of the construction works; Monitoring as required under the LARF, including of temporary land take/agreements by Contractor; Monitoring of indicators of problems arising from influx of workforce into the area (including consultations with Municipalities and local community); Traffic and road safety incidents. <p>PESR will insert these requirements into the tender documents in order to have the Contractor implement them as part of the construction contract.</p> <p>Operational Monitoring actions should include (but not be limited to) the following:</p> <ul style="list-style-type: none"> Levels of noise and air quality to be measured at representative roadside receptors, quarterly for a period of 2 years post-construction; All rehabilitated areas should be monitored quarterly for 24 months following site handover, to establish whether regrowth of vegetation is occurring. If not – additional measures – seeding, transplanting of saplings, import of additional topsoil, etc. – should be taken to encourage regrowth of vegetation; Traffic and road safety incidents. <p>PESR must ensure that these are actioned, either implementing them using internal resources, or by delegating them to a third party. The ESMS/OESMP should include the public disclosure of a summary of the key monitoring results. The monitoring plans must describe community</p>	<p>All environmental and social effects are appropriately monitored.</p>	<p><i>Responsibility:</i> Pre-construction & Construction: PESR to oversee. Contractor is responsible to organise pre-construction & construction phase monitoring. Some actions may be contracted out to third parties (e.g. monitoring consultants, ecologists, etc.) Operational: PESR to oversee. Some actions may be delegated to third parties (e.g. monitoring consultants, ecologists, etc.)</p> <p><i>Resources:</i> Pre-construction & Construction: As offered by the Contractor in the BoQ</p> <p>Operation: PESR to develop monitoring budget.</p>	<p>The Contractor shall prepare Construction Phase Monitoring Plans before construction begins, which will include baseline monitoring of parameters (e.g. air, noise, water, etc.) to be carried out before construction works begin. Monitoring Plan must be approved by the PIU/Supervising Engineer and PESR</p> <p>Operational monitoring plan to be developed prior to operation commencing and will continue into Operation phase.</p>	<p>Documented Monitoring Plans exist and updated.</p> <p>Provide updates on implementation in AESR to EBRD.</p>
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		relations monitoring parameters and processes, particularly in relation to management of issues raised by the local community.				
4	PR1: Assessment and Management of Environmental and Social Impacts and Issues	Managing & Monitoring Contractor Performance: PESR to set up internal mechanisms to monitor and review the environmental and social performance of the Contractor. This may be linked to role of Project Implementation Unit (PIU).	Monitoring compliance to minimise risk and maximise benefits	<i>Responsibility:</i> PESR <i>Resources:</i> Designated PESR in-house resources and/or PIU.	Mechanisms in place before construction begins	Internal monitoring mechanism in place – linked clearly to role of PIU. Report in AESR to EBRD.
5	PR2: Labour and Working Conditions	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).	Effective and improved HR & workforce management.	<i>Responsibility:</i> Contractor <i>Resources:</i> HR resources; Medical Facilities (or access arrangements to such facilities for workers)	By Construction commencement.	Documented and implemented HR policies and Grievance Mechanism. Compliance/audit reports. Engagements with Municipalities and healthcare providers locally recorded.
6	PR2: Labour and Working Conditions	Grievance Mechanism: The Contractor will develop and implement a grievance mechanism for workers (& their organisations if applicable e.g. sub-contractors) in-line with PR2 to enable individuals/groups to raise reasonable workplace concerns.	Improved employer-worker relationship			
7	PR2: Labour and Working Conditions	Use of Local Workforce: Contractor to include in HR Policy a policy of i) advertising all jobs locally, ii) of 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			
8	PR2: Labour and Working Conditions	Medical Facilities for Worker & Engagement With Local Healthcare Providers Contractor to ensure sufficient provision of medical care facilities and resources for workforce. Contractor to undertake engagement with Municipalities and local healthcare providers in Shtip & Radovish regarding any additional pressures this provision for their workers during construction may have on local healthcare related resources.				Report in AESR to EBRD
9	PR4: Health and Safety	Occupational Health & Safety (OHS): Contractor will establish a Health & Safety Plan as part of an OHS management system in line with OHSAS 1800. 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 made to: <ul style="list-style-type: none">• Working at heights• Movement of construction traffic and work equipment• Lifting operations• Electrical safety• Excavations and ground disturbance	Improved health and safety performance and safe working environment for workforce.	<i>Responsibility:</i> Contractor Supervised by Engineer <i>Resources:</i> Designated EHSS/OHS Manager	Plan must be approved before construction commences. Implemented during Construction Phase.	Documented Health & Safety Plan – ongoing safety statistics and data. Provide updates in AESR on implementation to EBRD.



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10	PR4: Health and Safety	<p>Traffic Management Plan:</p> <p>A Traffic Management Plan should be prepared by the Contractor prior to construction which should consider management of traffic on the existing A4 and local access roads from villages up the escarpment. The Plan should ensure suitable access or suitable alternatives to local communities is retained at all times and effects on journey times are minimised. Haulage routes shall avoid (as far as possible) local settlements and where they cannot strict driver provisions implemented (e.g. <i>training of drivers and in code of conduct</i>). Provisions should be included in the Plan for ensuring current levels of access to Public Transport (i.e. bus running along A4) and school bus services are retained and disturbance minimised on these essential community services.</p> <p>The management of the mixed traffic (i.e. animal drawn carts, motorised vehicles, livestock accessing the work areas etc.) should be addressed clearly in the Plan. Contractor will be required to carefully plan the works to existing structures/crossings etc. and put in place relevant H&S warning signage and provisions to minimise any risks to workers, local communities, users of the route/areas etc. Necessary short-term diversions may be necessary for such works and the Contractor shall engage with Municipalities and any locally affected parties (e.g. business, settlements etc.).</p>	Compliance with EBRD requirements on health & safety and to ensure health & safety, access & severance issues for local community are minimised.	<p><i>Responsibility:</i></p> <p>PESR to oversee.</p> <p>Contractor</p> <p>Supervising engineer</p> <p><i>Resources:</i> Contractor resources</p>	<p>Plan must be approved before construction commences.</p> <p>Plan must be implemented during Construction Phase.</p>	<p>Documented Traffic Management Plan</p> <p>List of timed engagements with local communities and Municipalities on diversions</p>
11	PR4: Health and Safety	<p>Road Safety Audit (RSA):</p> <p>To be financed by EBRD, PESR will work with EBRD to appoint an <u>independent</u> competent road safety auditor to undertake a Road Safety Audit in line with EU Directive 2008/906/EC on completion of final design and at key stages as indicated in the Directive. This should include a review of the lighting provision at the junctions only¹.</p> <p>Following RSA there should be mandatory inclusion of economically viable safety improvements into the design. Road Safety Audit will be conducted by a certified auditor. Where the road safety auditor recommendations are not implemented, the reason why each recommendation has been declined needs to be confirmed to the Bank.</p> <p>A road safety inspection shall be carried out on road once operational, and if appropriate action plans developed for low cost remedial road safety measures.</p>	Reduction of accident risks and improved road safety.	<p><i>Responsibility:</i></p> <p>PESR/Consultant</p> <p><i>Resources:</i> Technical Cooperation resources to be provided by EBRD.</p>	End of detailed design Phase (and subsequent RSAs at key stages as required under EU Directive 2008/96/EC).	<p>Documented Road Safety Audit.</p> <p>Report in AESR to EBRD.</p>
12	PR4: Health & Safety	<p>Maintenance of Protective Fence:</p> <p>As the Project includes the provision of a protective fence along the Expressway to reduce the risk of informal access from adjacent land (vehicles and livestock) during operation this fence shall be maintained.</p> <p>It is also important that the fence is well maintained specifically between km 21.000 and 25.000 at the bio-corridor, to <u>reduce the ingress of animals into the road corridor</u>.</p>	Management of road safety and community safety risks.	<p><i>Responsibility:</i> PESR to oversee. Some actions may be delegated to third parties.</p> <p><i>Resources:</i> include within maintenance</p>	<p>Fence to be in place prior to opening of the Expressway.</p> <p>Maintenance arrangements to be developed prior to</p>	Maintenance of fence to be monitored as part of ESMS/OESMP.

¹ Please note: additional benefits from provision of lighting along the route (e.g. improved driver experience and safety etc.) should be balanced with potential effects on biodiversity through the Pilav Tepe section and light nuisance from introducing a lit corridor etc.



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				budget for Expressway.	operation commencing, will continue into Operation phase.	
13	PR5: Land Acquisition, Involuntary Resettlement and Economic Displacement	Preparation & Implementation of RAP: Develop a Resettlement Action Plan (RAP) to meet the requirements of PR5, using the Land Acquisition and Resettlement Framework (LARF) as a basis, and using information from the socio-economic survey and once consultations have been held with local land owners and users. Use the results of the socio-economic survey (<i>see Action 14 below</i>) to confirm whether documents or consultations on land acquisition and livelihood restoration need to be provided in additional languages. Include all commitments as set out in PR5 and LARF.	Compliance with EBRD & National requirements.	<i>Responsibility:</i> PESR <i>Resources:</i> Designated internal resources, or consultants PIU to contain an experienced social consultant.	Before Construction Phase (i.e. no land access until payment of compensation received by eligible parties).	Submit RAP to EBRD for review when prepared. Documented and implemented RAP. Report progress in AESR to EBRD.
14	PR5: Land Acquisition, Involuntary Resettlement and Economic Displacement	Socio-Economic Survey/Census: A socio-economic survey/census is required of Project Affected Persons (<i>including local villages who are dependent on A4 for access</i>) in order to inform the RAP. Discussions should be held with the Municipalities in planning these surveys. The surveys shall be timed ideally to occur in parallel or in a similar timeframe as the assets inventory. The survey shall assist in identification and recording of persons who have no recognisable legal claim to the land they occupy or use in the affected area. During the socio-economic surveys information should be gathered to confirm which villages use and/or own land, including any abandoned agricultural land. The strategy for the surveys should ensure that vulnerable groups are included (<i>i.e. cannot just be reliant on people coming to public meetings</i>) and customary use of land by certain villages is captured. During the survey at the very small informal farm development in Section II it needs to be confirmed if people are residing there ² .	Compliance with EBRD Requirements.	<i>Responsibility:</i> PESR <i>Resources:</i> Designated internal resources, or consultants PIU to contain an experienced social consultant	Prior to finalisation of RAP and before Construction Phase.	Documented and implemented socio-economic survey/census results. Strategy for survey/census submitted to EBRD for review when prepared. Report in AESR to EBRD.
15	PR6: Biodiversity Conservation and Sustainable Management of Living Resources EU Habitats Directive	Alteration of Pipe Culvert to Box Culvert at km 24.570 at Bio-corridor A box culvert of similar dimension is to be used at chainage km 24.570 instead of a 1.5 m dia. pipe culvert as proposed in design (24/09/15). (A flat floored crossing at this point would be more suitable for certain protected species that are known to use the corridor).	Reduce severance effects on Smdres Bio-corridor.	<i>Responsibility:</i> PESR to instruct designer <i>Resources:</i> Designated in-house resources (PESR & Designer)	In final detailed design.	Inclusion of revised culvert arrangement in Final Design.

² The Municipality of Shtip offered assistance with establishing who is using the site and looking at options with PESR for alternative locations/other assistance if people are found to be residing there.



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16	PR6: Biodiversity Conservation and Sustainable Management of Living Resources EU Habitats Directive	<p>Review of Spoil Disposal Areas:</p> <p>In Section III, as part of a review of the spoil disposal areas an ecological survey will be undertaken accompanied by specialist to identify locations which will <u>not</u> directly affect Annex I grassland habitat, and the necessary environmental elaborates (or other documents) as required by national legislation will be prepared and submitted to the relevant authorities. Permitted locations for spoil disposal by relevant authorities (i.e. as outlined in approved environmental elaborates/documentation) to be marked using GPS and maps passed to Contractor through contract documentation. Contract documentation to prohibit disposal of spoil outside these areas.</p>	To avoid and reduce loss of dry grassland habitat (an Annex I habitat).	<p><i>Responsibility:</i> PESR to instruct designer</p> <p><i>Resources:</i> Designated in-house resources (PESR & Designer) and ecologist.</p>	Before contract documents finalised.	<p>Inclusion of revised (ecologist-approved) permitted disposal areas in environmental and design documentation.</p> <p>Report on implementation to be included in AESR to EBRD.</p>
17	PR6: Biodiversity Conservation and Sustainable Management of Living Resources EU Habitats Directive (PR3: Resource Efficiency & Pollution Prevention & Control – biodiversity management measure/requirement 2)	<p>Biodiversity Management Measures/Requirements:</p> <p>Contractor to implement the following Biodiversity Management Measures/Requirements which are to be integrated within the CESMP and form a discrete biodiversity management section:</p> <ol style="list-style-type: none"> Restrictions to Contractor Access: Contractor is prohibited from accessing areas of natural habitat for any purposes (e.g. general access, storage of plant and equipment, etc.) except where this is <u>absolutely necessary to construct the works</u>. Specific areas which the Contractor should avoid include: Annex I Priority Habitat: dry grass pseudo steppe and halophytic grasslands between kms 1.000 and 4.000; Annex I Habitat: dry grasslands kms 1.600 to 3.400, 10.500 to 12.600, 15.000 to 15.400; and Annex I Habitat: Riverine willow-poplar habitats, kms 5.500 and 27.600. Preservation Measures for Watercourses and Streams: Contractor to produce as part of CESMP method statement to cover working in watercourses (dry or wet). Statement to take account of the following provisions): <ul style="list-style-type: none"> No access or works in any river channel unless absolutely necessary to construct the works; No parking of plant or storage of any equipment or oil, fuel or chemicals within 100 m of dry or wet river channel; River flow to be maintained at all times. If access is required to the flow channel, measures should be taken to divert the flow past the works. No storage or discharge of any wastewater, effluent, excavation spoil or any other material may be made to the river channels or watercourses; Contractor should be prepared for flash flood and sudden rises in water level and water flow, and should secure all works (including embankments under construction, shuttering, steel, etc.) so they are not disrupted by flood flows. Any pollution event in the watercourses shall be made good by the contractor, to the satisfaction of the PIU/Supervising Engineer and MoEPP. 	<p>Ensuring minimal loss of natural habitats.</p> <p>Preservation of Riverine Habitat and reduction of risks to downstream sensitive/protected areas.</p> <p>Reducing loss of individuals, including of protected species.</p> <p>Protection of nesting birds in International Bird Area, and Pilav Tepe/Ploce forested areas.</p>	<p><i>Responsibility:</i> PESR to include in contract documentation. Contractor to develop & implement. Engineer to approve</p> <p><i>Resources:</i> Included in Contractor’s price.</p>	CESMP (including biodiversity section) to be developed by Contractor before construction and implemented during Construction Phase (before construction commences Plan must be approved by the Supervising Engineer and PESR.)	<p>Construction Environmental & Social Management Plan (including biodiversity management section & associated Method Statements) documented and approved.</p> <p>Provide updates on implementation in AESR to EBRD.</p>



		<ul style="list-style-type: none"> • Engagement of Ecologist: The Contractor shall engage an ecologist for the following activities whose scope of work will be clearly outlined in the biodiversity management section of the CESMP: At areas of natural habitat which lie directly within the road corridor, immediately before land clearance begins, Contractor to engage ecologist to supervise a pre-construction clearance of any mobile animals (e.g. tortoises, amphibians, etc.) from the area. This should occur at the following locations: All river crossings; and All coniferous or deciduous woodlands where trees or shrubs will be removed (i.e. kms 10.000 to 10.800, 12.600 to 12.800, 14.600 to 14.700, at 15.800, and from 17.000 to 25.400). • An ecologist to be engaged to supervise pre-construction clearance of any mobile animals (e.g. tortoises) or nests, etc. from areas of vegetation to be cleared, including in river channels, and especially in Bregalnica River basin. Clearance to be confined to only areas necessary to construct the works. • In addition, where any pools are likely be directly affected by the works (e.g. will be drained, or excavated), and where the works will occur between March and July (inclusive) attempts should be made, with the assistance of ecologists, to relocate amphibians to adjacent pools which will be undisturbed by the works, in order to reduce amphibian mortality during the works. • In the bio-corridor section km 21.000 to 25.000 an ecologist is to be engaged during the construction contract to examine the surrounding terrain on the outside of the fence line, and design and plant some vegetation corridors to encourage animals towards the crossings, and provide some cover for them. <p>3. Protection Measures Between kms 18.000 and 24.000 (Important Bird Area (IBA): In order to minimise damage to nesting birds in the stretch between kms 18.000 and 24.000, the Contractor is prohibited from the following activities along this stretch:</p> <ul style="list-style-type: none"> • Conducting any blasting or rock breaking operations during the spring bird nesting season March – July (inclusive); • Entering any forested areas except those strictly necessary for construction of the permanent works; • Clearing any forest vegetation except within the working corridor; • Siting any access roads, workers’ barracks, material excavation sites, spoil deposition sites; • Excavating any material for fill or aggregate, or any other purpose except within the corridor of the permanent works. • Allowing construction workers to enter the forested areas for any purpose, or to search for nests or eggs. <p>4. Rehabilitation of Damaged Vegetation:</p> <ul style="list-style-type: none"> • Once the construction works is complete, areas no longer required for permanent infrastructure, including areas used for access roads, storage ponds, side slopes to cuttings and embankments, river banks, etc. should be rehabilitated by the placement of soil and seeding (if necessary) to allow regrowth of natural vegetation. Rehabilitation of the riverine vegetation in the river channels – especially at the Bregalnica River crossing – is especially important. Assistance from botanical specialists should be sought to guide the rehabilitation works. 				
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		<ul style="list-style-type: none"> All re-vegetation to use only species native to the area, to prevent the introduction of invasive species. Rehabilitated areas should be monitored quarterly for 24 months by an ecologist following site handover, to establish whether regrowth of vegetation is occurring. If not, additional measures – seeding, transplanting of saplings, import of additional topsoil, etc. – should be taken to encourage regrowth of vegetation. 				
18	PR8: Cultural Heritage	<p>Cultural Heritage Resources Chance Finds Procedure: Establish Chance Finds Procedure for the construction period (<i>however, anticipated to be low risk of chance finds along the route</i>), to include pre-excavation notification to Ministry of Culture.</p>	Minimising risks to cultural heritage sites	<p><i>Responsibility:</i> PESR, Contractor, Supervising engineer</p> <p><i>Resources:</i> or Contractor</p>	Notification to Ministry during construction, prior to excavations commencing.	Report on implementation to be included in AESR to EBRD.
19	PR10: Information Disclosure and Stakeholder Engagement	<p>Stakeholder Engagement and Disclosure of Project Information: 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 Non-Technical Summary, 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> <p>Public Meetings (on the basis of the NTS) need to be undertaken in both the Municipal centres (i.e. Shtip & Radovish) and a few villages along the route (i.e. (i.e. Lakavica & Sofilari & possibly Selce; and Buchim, Topolnica and Inevo). Existing community structures (e.g. Village Counsels and Representatives) will be used in the methods of engagement.</p>	Management of risks and impacts on affected communities & businesses (& other stakeholders).	<p><i>Responsibility:</i> PESR, Designer, Contractor</p> <p><i>Resources:</i> Internal resources (PESR & Designer)</p>	Before Construction Phase – continue during construction and operation.	<p>Information disseminated, documented in updated SEP.</p> <p>Report in AESR to EBRD.</p>
20	PR10: Information Disclosure and Stakeholder Engagement	<p>Grievance Mechanism: PESR and Contractor to implement a Grievance Mechanism for affected parties and stakeholders (<i>as included within the SEP & LARF</i>). PESR to ensure grievances are monitored.</p>	Management of risks and impacts on affected communities & other stakeholders (e.g. local businesses).	<p><i>Responsibility:</i> PESR, Contractor, Supervising engineer</p> <p><i>Resources:</i> Internal resources (PESR & Designer, Contractor)</p>	Before Construction Phase – continue during construction and operation.	<p>Information disseminated, documented in updated SEP.</p> <p>Report Grievances logged etc. in AESR to EBRD</p>