First Look Solutions	
XXX-X-XXXX-XX-XXXX-000-00	

Title:

Environmental and Social Management Plan for Vifor Wind Farm Project

Topic:

Defines arrangements in place for the management of environmental and social aspects during Vifor Wind Farm Project Execution

Target Group:

Employer/First Look Solutions, EPC, Owner's Engineer

	Name	Position	Signature	Date
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Contents

ABBREVIATIONS

BMMP	Biodiversity Management and Monitoring Plan
CHMP	Cultural Heritage Plan and Chance finds procedure
CHSMP	Community Health and Safety Management Plan The
CMP	Construction Management Plan (generic term for management plans, method statements, work procedures developed and implemented by EPC Contractor or their subcontractors)
CR	Commitments Register
EP4	Equator Principles (4th edition)
EPC	Engineering, Procurement, and Construction
EPRP	Emergency Preparedness and Response Plan
E&S	Environmental and Social
EE&S	Environmental, Social, Health and Safety
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan (this document)
ESMS	Environmental and Social Management System
GBVH	Gender-Based Violence and Harassment
IFC	International Finance Corporation
LMP	Labour Management Plan
LRP	Livelihoods Restoration Plan
MSRA	Method statements risk assessment
OHL	Overhead Transmission Line
OHSMP	Occupational Health and Safety Plan
PPCP	Pollution Prevention and Control Plan
PS	Performance Standard
RE	Rezolv
SEP	Stakeholder Engagement Plan
TMP	Traffic Management Plan
UNECE	United Nations Economic Commission for Europe
WTG	Wind Turbine Generator

1 INTRODUCTION

1.1 PURPOSE

First Look Solutions S.A. (the Project Owner or the Company) is a Romanian-based company established to build, own, and operate the Vifor Wind Farm Project (the Project).

IFC Performance Standard 1 (PS1) requires that the client, in coordination with other responsible government agencies and third parties as appropriate to, "conduct a process of environmental and social assessment and establish and maintain an environmental and social management system (ESMS) appropriate to the nature and scale of the project and commensurate with the level of its environmental and social risks and impacts. The ESMS will incorporate the following elements: (i) policy; (ii) identification of risks and impacts; (iii) management programs; (iv) organizational capacity and competency; (v) emergency preparedness and response; (vi) stakeholder engagement; and (vii) monitoring and review".

A comprehensive Environmental and Social Impact Assessment (ESIA) Package has been prepared for the Project to identify the Environmental and Social (E&S) risks and impacts. It forms the basis of this Environmental and Social Management Plan (ESMP) and supporting documentation, which together comprise the Project Environmental and Social Management System (ESMS); E&S covers the topics of environment, health and safety, social, security and labour.

This ESMP aims to define how the Owner ESMS for the Project will be implemented. Key objectives are to:

- Provide an overview of the environmental and social policies, regulations and standards applicable to the Project to all project staff, including contractors;
- Document and direct Project Owner's personnel and guide the Engineering, Procurement and Construction (EPC) Contractor on how Project Environmental and Social (E&S) risks are managed during the construction stage of the Project to conform with applicable policies, regulations and standards and ensure the Project commitments are attained. This includes (i) establishing measures to be applied, (ii) communicating requirements to project staff, including contractors, and (iii) oversite of requirements implementation, as detailed further in this ESMP;
- Clarify E&S compliance assurance roles and responsibilities during the construction stage of the Project;
- Ensure that adequate processes are in place to appropriately monitor construction activities against Project E&S policies, regulations and standards;
- Ensure reporting systems are developed and implemented to communicate E&S compliance performance to the Project Owner's leadership and further to all project staff, including contractors;
- Define requirements for emergency preparedness and control,
- Facilitate continual improvement and E&S compliance assurance.
- Outline key commitments in the Project Commitments Register (CR).

This ESMP details the E&S management processes associated with the project's design, construction and commissioning stages. Elements of this ESMP, notably the sub plans that form a crucial component of ESMS, will be revised as needed to accommodate any new mitigation required and to reflect lessons-learned from the E&S monitoring. The supporting sub plans can be found in Appendix 6.

The ESMP will be subsequently updated and revised as appropriate for the operational stage of the Project to reflect the different E&S risks at that stage and any lessons-learned to date – referred to as the

[2] *The term "Embedded Controls" refers to those protective measures that are anyhow already included in the approved Project Design, therefore such items do not normally need to also be added as a further commitment.*

Operation-ESMP. The Operation-ESMP, along with supporting operational management plans, will be drafted during the end of the construction stage and disclosed before the start of the Vifor Wind Farm Project commercial operations.

This ESMP provides an overview of the processes to identify, avoid, mitigate, manage monitor and report on Project E&S risks during the engineering and construction stage. The ESMP is the central document of the Project E&S management system and is supported by a series of subordinated E&S management sub plans forms, templates, and procedures implemented at Company and Contractor levels:

- Project Owner Level E&S Management Plans – see Figure 3 for an overview of the various management plans. These plans lay out the processes developed by First Look Solutions to ensure Project policies and standards as well as the commitments arising from the ESIA process are applied during the design and construction stage of the Project through establishing specific measures to be applied and outcomes to be achieved by the Company a EPC Contractor respectively when implementing the project.
- The Contractor is required to demonstrate how the outcomes and measures allocated to them will be delivered through its working methods and processes and, where required, actions specified in supplementary contractor E&S Management plans, all of which will form part of their own E&S management system to be put in place by the EPC Contractor to ensure implementation of the Project policies, standards and commitments during own Project construction activities.

Box 1.1 Project E&S risks management approach.

The management of the Project's E&S risks will follow a "sequential " approach, reflecting good international practice:

- The guiding E&S policies and risk management processes are outlined in this ESMP. EPC must, on this basis, develop their own EPC-ESMS (to be approved by First Look Solutions)
- Project specific E&S risk management requirements, as determined through the ESIA process, are outlined in the commitment register and translated into Project Owner – Level E&S sub plans;
- EPC must - on this basis - develop their own EPC-ESMS (to be approved by First Look Solutions) to deliver the measures and outcomes outlined in the owner sub plans - typically through their Woking methods and processes and, where required, through topic specific Contractor Level E&S Management Plans s
- EPC must implement and enforce the EPC-E&S management measures as specified in such documentation ESMP in their activities and those of any of their subcontractors and other service providers;
- EPC undertakes periodic monitoring of EPC- management measures as ESMP(and reports to the Project Owner);
- Project Owner conducts its overall monitoring of the EPC performance (and reports to Lenders);
- Lenders and external advisors conduct independent Project E&S audits.

Updates/revisions to the ESMP and the EPC-HSE Plan will be implemented as appropriate to reflect the ongoing findings of the monitoring and audits performed, as well as the corresponding staff training. This approach provides for a robust system with continual Project E&S risk management improvement.

1.2 THE VIFOR WIND FARM PROJECT

The Project is located in Buzau County, south-east of Buzau City, in the administrative areas of Costeşti, Gherăseni, Smeeni and Luciu communes and Pogoanele town, being located mainly in Călmăţui River

meadows and secondary in the tabular fields of Pogoanele town. The site is in an area of dry and salt steppes and pastures, partially overlapping the Natura 2000 sites ROSCI0259 Valea Călmăţuiului and ROSPA0145 Valea Călmăţuiului.

The Project extends on a total area of approximately 2,869 ha, has a total capacity of 446.4 MW and comprises 72 EnVentus Vestas V162 type wind turbine generators (WTGs) of 6.2 MW each.

The WTGs are connected via underground cable lines to a single transformer station and through a short overhead transmission line (OHL) to the national grid. The wind farm will use a network of existing agricultural roads and newly built access roads, along which the underground cable lines will be installed, and which will include an East-West construction corridor as the main road artery.

A Project location map is provided in Figure 1 overleaf.

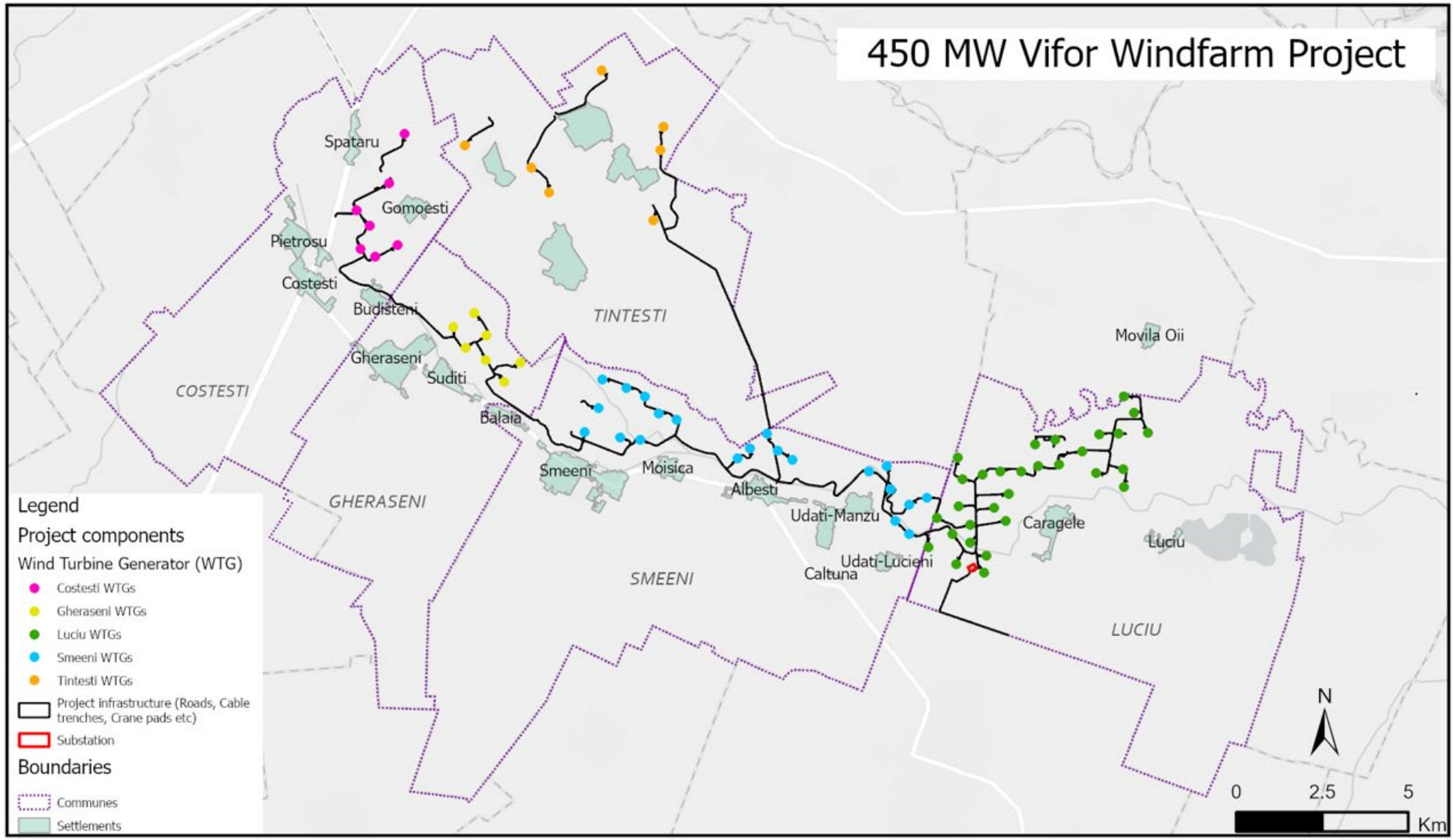


Figure 1: Vifor Wind Farm Project Location Map

2 VIFOR WIND FARM PROJECT E&S MANAGEMENT SYSTEM

2.1 PROJECT OWNER'S MANAGEMENT SYSTEM CONCEPT

The Project E&S Management System is based on a four-step iterative process aligned with the Plan-Do-Check-Act model as represented in Figure 2 overleaf aligned with ISO 14000 and ISP45001. The concept reflects an adaptive management loop that accommodates changes as the Project moves through the various design and implementation stages.

All of the main activities corresponding to the above four components of the Project E&S management system are described in the following sections of this ESMP (to facilitate reader orientation, the respective stage of **[PLAN], [DO], [CHECK], [ACT]** is indicated at the subsection headings).

The Plan-Do-Check-Act model was transposed in the Project's ESMS as defined in this ESMP (this document) following a staged approach, organized in three levels as represented in Figure 3.

This process is initiated by identifying the applicable requirements, regulations and standards and defining the principles and leadership commitments stated in the First Look Solutions Code of Conduct & Business Ethics and Policies.

Subsequently, the Project's E&S risks and impacts were identified and assessed based on the ESIA package of studies performed for the Vifor Wind Farm Project. The ESIA identified the embedded E&S controls[2] and defined the mitigation measures required to address the residual ESES impacts and ensure that the Project requirements, regulations and standards are met. Addressing the E&S risks and impacts represents a Project commitment, specifically a commitment by the Project Owner to ensure that these measures will be implemented during the Project execution – either by the Project Owner themselves or via the EPC or other parties.

The E&S mitigation measures defined as resulting from the ESIA process were transposed into a CR (annex to this ESMP) serving as a tool which informs this ESMP and the E&S sub plans to be implemented at the various levels of the Project organization.

This ESMP is a critical component of the Project E&S risk management system, providing an overview of the processes and tools to manage Project E&S risks within the frame of the Plan-Do-Check-Act model. The ESMP sets the requirements for the management planning (operational controls, performance review and evaluation) to be established and maintained by the Project Owner and the EPC Contractors.

The above-indicated management system concept and the relationship between the ESMP, the Project requirements, regulations and standards (see section 6.2), and the management plans at the various levels of the Project E&S Management System, is represented in Figure 2 overleaf

In addition to the topic specific requirements, the requirements for the E&S management system components are detailed in the following sections of this ESMP and considered the requirements of ISO14001:2015[3] environmental management and ISO 45001 Occupational Health and Safety management[4]

[2] *The term "Embedded Controls" refers to those protective measures that are anyhow already included in the approved Project Design, therefore such items do not normally need to also be added as a further commitment.*

[3] https://www.iso.org/iso-14001-environmental-management.html

[4] Replaced OHSAS 18001 for full transition by 2021

Figure 2: Vifor Wind Farm Project ESMS

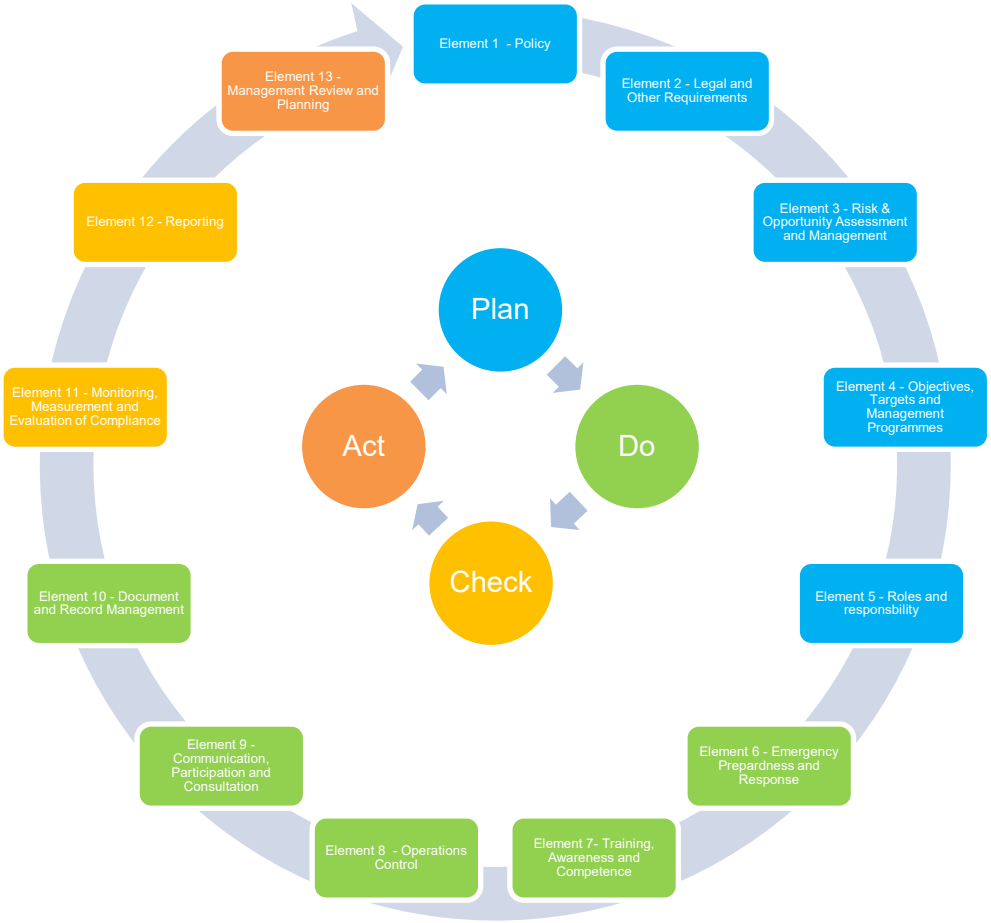
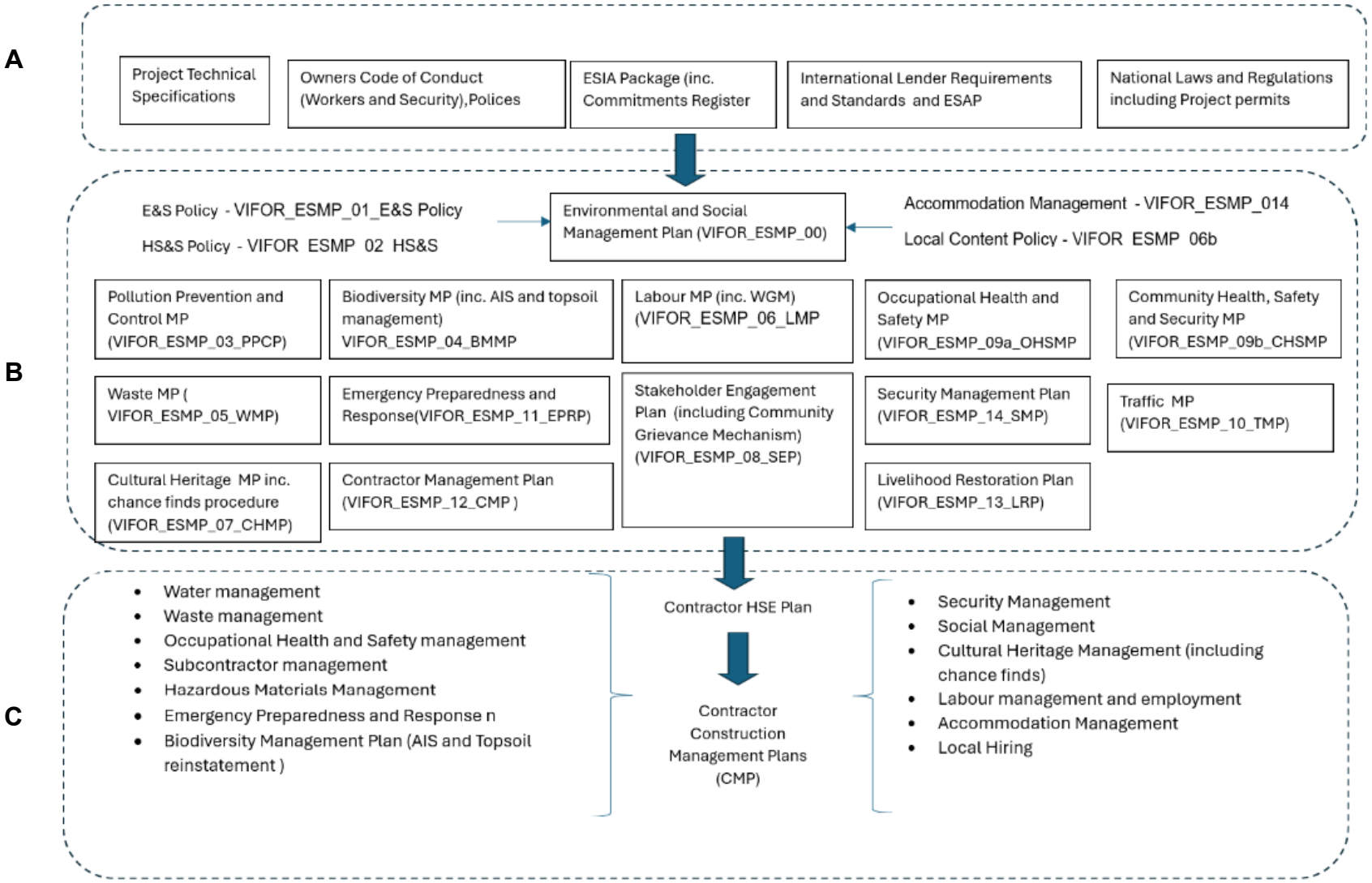


Figure 3:Vifor Wind Farm Project ESMS Management Planning Structure



3 PROJECT OWNER'S CODE OF CONDUCT AND POLICIES [PLAN - ELEMENT 1]

First Look Solutions has developed a set of overarching E&S company policies relating to environmental and social, labour, and local content, as listed below, and has committed to implement these on the Project to guide and ensure conformance to the Project Requirements, Regulations and Standards. These are applicable to all activities, including the construction works program and all staff working for the Project:

- E&S Policy (RE_VIFOR_ESMP_01_E&S Policy)
- HS&S Policy (RE_VIFOR_ESMP_02_HS&S Policy)
- Accommodation Management Policy RE_VIFOR_ESMP_014_Appended to LMP
- Local Content Policy (RE_VIFOR_ESMP_06b_Local Content Policy) In LMP

In addition, there are Owner policies as follows:

- Code of Conduct and Business Ethics;
- Anti-Bribery and Anti-Corruption Policy;
- Corporate Social Responsibility Policy;
- Employment Policy;
- Whistle Blower Policy;
- Environmental and Social Policy;
- Health and, Safety, and Security Policy;

These policies establish the framework for the Project's health and safety, environment, labour and social management processes as further developed and defined within this ESMP.

All Policies will be displayed in a prominent location in the Project offices and around the Site and circulated to all Contractors. E&S Policies are reviewed on an annual basis.

4 PROJECT REGULATIONS, STANDARDS AND GOOD PRACTICE [PLAN - ELEMENT 2]

First Look Solutions and its EPC Contractors are required to meet a number of key E&S requirements, regulations and standards as outlined below. This ESMP is intended to support transposition of these standards into Project implementation.

These Project requirements regulations and standards represent the basis of the Project E&S management system and are represented in Figure 3 – Level A.

The Project requirements regulations and standards are explained below.

4.1 OBJECTIVES

An effective ESMS includes processes and procedures to meet and update the applicable legal requirements and compliance obligations. he following requirements are applicable during all stages of the Project.

4.2 NATIONAL LEGISLATION AND PERMITTING

Key E&S legislation (including health and safety and labour) applicable to Vifor Wind Farm Project are summarised in Appendix A.

The Project Owner and its EPC Contractor will comply with the requirements of all national laws, regulations and codes of practice, and fulfil all applicable regulatory requirements.

To ensure this, the Project Owner will maintain a Legal Register (VIFOR_ESMS_Forms_F01) and Permit Register (Permit matrix (VIFOR_ESMS_Forms_F02) and Conditions Matrix (VIFOR_ESMS_Forms_F03) throughout the project life cycle to consolidate all applicable environmental and social compliance obligations for the Vifor Wind Farm Project.

The EPC Contractor will set up a process for tracking and implementing any regulatory changes and requirements updates relevant for their activity.

The permit register constitutes an integral part of the EPC Contract. The up-to date version of the register (updated as changes occur) is available at all times for both the Project Owner and the EPC Contractor though the document sharing, and communication platform established for the Project.

4.3 EU AND INTERNATIONAL LEGISLATION

International conventions and protocols

International conventions ratified by Romania and relevant to the Vifor Wind Farm Project include:

- United Nations Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters 1998, ratified by Law no. 86/2000 (Aarhus Convention);
- The Kyoto Protocol on Climate Change
- The United Nations Convention on Biodiversity 1992 ratified by Law no. 58/1994
- Convention on the Conservation of European Wildlife and Natural Habitats, 1979, ratified by Law no. 13/1993 (Bern Convention);

- Convention on Conservation of Migratory Species of Wild Animals, 1979, ratified by Law no. 13/1998 (Bonn Convention);
- International Union for Conservation of Natural Resources Red List of Threatened Species
- European Convention on the Protection of the Archaeological Heritage, 1992, ratified by Law no. 150/1997 (La Valetta Convention);
- European Landscape Convention, 2000, ratified by Law no. 451/2002 (Florence Convention);
- The Basel Convention 1989
- The International Labour Organisation's Core Conventions;

Additional details on the above-indicated international conventions and protocols are provided in Appendix A.

International Environmental and Social Policies, Standards Guidelines and Good Practice

The international environmental and social policies and the key good international industry practice standards applicable to the Project are:

- EBRD Environmental and Social Policy (May 2014) and associated Performance Requirements;
- Equator Principles IV (2020);
- International Financing Corporation (IFC), Performance Standards (PS) (2012);
- IFC Environmental, Health and Safety Guidelines for Wind Energy (2015);
- IFC Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution (2007);
- World Bank Group, General Environmental, Health, and Safety Guidelines (2007); and
- World Bank Group, Environmental, Health and Safety Guidelines for Wind Energy (2015).
- IFC/EBRD Guidance Note: Worker's Accommodation: Processes and Standards (2009);
- Voluntary Principles on Security and Human Rights.
- IFCIFC Good Practice Note on Non-Discrimination and Equal Opportunity;
- IFC Good Practice Note – Managing Retrenchment;
- IFC Handbook – ESMS Implementation;
- IFC Stakeholder Engagement- Good Practice Handbook for Companies Doing Business in Emerging Countries;
- IFC Good Practice Note – Addressing Grievances from Project-Affected Communities;
- IFC Good Practice Manual – Doing Better Business Through Effective Public Consultation and Disclosure;
- IFC Handbook for Labour and Working Conditions - Measure & Improve Your Labour Standards Performance;
- IFC Guide to Health Impact Assessment (2009);
- IFC Guide to Project-induced in-migration (2009);
- WB Guidance Note on Managing the Risks of Adverse Impacts on Communities from Temporary Project Induced Labor Influx (2006);

- IFC Good Practice Handbook to Cumulative Impact Assessment and Management: Guidance for the Private Sector in Emerging Markets (2013);
- IFC Resettlement Handbook (2002);
- IFC/WB Environmental, Health, and Safety Guidelines for Construction Materials Extraction (2007);
- IFC/WB Environmental, Health, and Safety Guidelines for Water and Sanitation (2007);
- IFC Good Practice Note Managing Contractors' Environmental and Social Performance (2017).

5 E&S IMPACT IDENTIFICATION AND RISK MANAGEMENT [PLAN - ELEMENT 3]

5.1 OBJECTIVES

In line with IFC PPS1 (para. 7), 'The client will establish and maintain a process for identifying the environmental and social risks and impacts of the project…' and criteria for systematically evaluating E&S aspects and impacts.

The Project Owner seeks to address E&S hazards and risks at the development stage through impact assessment aligned with national regulations and international best practice (ESIA process).

5.2 E&S RISK IDENTIFICATION

An ESIA was performed for the Project with supporting documentation. A full list of the relevant documentation is maintained in Form F10, Register of documents. The E&S mitigation measures identified from the ESIA process were transposed into a CR (RE_VIFOR_ESMS_CR) which is provided in Attachment 2.

During project implementation, the Owner places responsibility on the Contractor to implement a hazard identification and risk management procedure for all construction and operation activities. The EPC Contractor must include the following requirements into the impact identification and risk management requirements and define in outlined in a impact identification and risk management procedure.

- Pre-site E&S risk evaluation
- Activity specific method statements and risk assessments (MSRA) covering H&S, environment and social.
- Job Safety Analysis

5.3 E&S COMMITMENTS REGISTER

Upon completion of the ESIA process, the mitigation measures addressing the potential Project's impacts as defined in the ESIA package were transferred into an E&S CR (CR) (the CR RE_VIFOR_ESMS_CR).

The E&S CR consolidates the applicable E&S mitigation measures defined in the ESIA package as actionable measures, management and monitoring activities for implementation during Project execution stages.

The E&S CR was developed in an easily understandable format allowing to be used as a tool by the Project E&S staff during Project execution. For ease of use and implementation, the CR is organized to provide for each commitment indication on:

- the Project stage (i.e. construction and operation) the respective commitment is applicable to,
- responsibility for implementation (i.e. Project Owner and/or EPC),
- Project location/site the respective commitment is applicable to, and
- the Project Owner's and EPC management plan ensuring implementation of the commitment.

In turn, the CR informs the Project Owner and the EPC Contractors' Management Plans which detail the resources and processes to be put in place to ensure the commitments implementation. The CR is only reviewed and updated when a significant change happen that may change the commitments of the Project.

A printout of the CR represents an integral part of this ESMP and is provided in Annex 2 of this document. The CR includes, in the case of each item, indication of the management plan(s) ensuring the implementation of the respective commitment.

6 OBJECTIVES, TARGETS AND MANAGEMENT PROGRAM [PLAN - ELEMENT 4]

6.1 OBJECTIVES

As per IFC Performance Standard 1 (para. 13), 'Consistent with the client's policy and the objectives and principles described therein, the client will establish management programs that, in sum, will describe mitigation and performance improvement measures and actions that address the identified environmental and social risks and impacts of the project.'

The Project Owner will provide the developed construction Environmental and Social Management System (ESMS) to the EPC contractor and provide oversight to ensure that the EPC Contractor has appropriately developed their other related management plans in line with the Project's obligations.

6.2 PROJECT OBJECTIVES AND TARGETS

The Project Owner has overall responsibility for the implementation of the Project E&S mitigation measures. To ensure this, a Project ESMP and a number of E&S sub-plans have been developed by the Owner to facilitate the implementation of Project commitments, requirements, regulations and standards in line with expectations (collectively known as the Owner ESMS). Specific objectives and targets aer included in the E&S sub plans at the topic specific level.

6.3 PROJECT OWNER–LEVEL E&S MANAGEMENT PLANS

The Project ESMP and E&S sub-plans detail the management and implementation processes required to achieve commitments, requirements, regulations and standards. The main roles of the Project ESMP and sub plans are to:

- Define the processes in place to ensure that the Project Owner implements the Project commitments, requirements, regulations and standards under their direct responsibility.
- Define the compliance and assurance processes, ensuring that the work planned and performed is conducted according to the Project E&S commitments, requirements, regulations and standards.
- Ensure that the Project Owner implements E&S oversight of the EPC Contractors to measure the effectiveness of their self-verification processes with E&S commitments, requirements, regulations and standards;
- Define and communicate to the EPC Contractors the requirements regarding the specific management procedures they must implement during Project execution.

The Project ESMP and sub plans are defined as follows:

- Construction ESMP (VIFOR_ESMP_00)
- Pollution Prevention and Control Plan (including noise, dust, hazardous materials, and effluent wastewater) (VIFOR_ESMP_03_PPCP)
- Biodiversity Management and Monitoring Plan (including Invasive Species Management) (VIFOR_ESMP_04_BMMP)
- Waste Management Plan (VIFOR_ESMP_05_WMP)
- Labour Management Plan (VIFOR_ESMP_06_LMP) including:
    - Workers Grievance Mechanism (and template form),
    - Labour Commitment Policy
    - Local Content Policy

  - Workers and Security Code of Conduct
- Cultural Heritage Plan (including chance finds procedure) (VIFOR_ESMP_07_CHMP)
- Stakeholder Engagement Plan, including community grievance mechanism(VIFOR_ESMP_08_SEP)
- Occupational Health and Safety Plans plan (VIFOR_ESMP_09a_OHSMP)
- Community health and safety plan (VIFOR_ESMP_09b_CHSMP)
- Traffic Management Plan (VIFOR_ESMP_10_TMP)
- Emergency Preparedness and Response Plan (VIFOR_ESMP_11_EPRP)
- Contractor Management Plan (VIFOR_ESMP_12_CMP)
- Livelihood Restoration Plan (VIFOR_ESMP_13_LRP)
- Security Management Plan (VIFOR_ESMP_14_SMP)

Supporting forms and templates developed as part of the project ESMS for implementation of the ESMP and supporting management plan requirements are as follows:

- Legislation register (VIFOR_ESMS_Forms_F01)
- Permit matrix (VIFOR_ESMS_Forms_F02)
- Conditions matrix (VIFOR_ESMS_Forms_F03)
- Inspection and audit plan (VIFOR_ESMS_Forms_F04)
- Training matrix (VIFOR_ESMS_Forms_F05)
- Monitoring matrix (VIFOR_ESMS_Forms_F06)
- Monthly E&S reporting (construction) (VIFOR_ESMS_Forms_F07)
- Incident reporting form (VIFOR_ESMS_Forms_F08)
- Corrective Action Plan (template) (VIFOR_ESMS_Forms_F09)
- Register of project documentation (VIFOR_ESMS_Forms_F10)
- Contractor evaluation form (VIFOR_ESMS_Forms_F11)
- Register of land needs (RE_ESMS_F12)
- Community grievance form (VIFOR_ESMS_Forms_F14)
- Community grievance log (VIFOR_ESMS_Forms_F15)
- External consultation log (VIFOR_ESMS_Forms_F16)

The sub plans include but will not be limited to the content outlined in the following table.

Table 1:Project Owner-level Construction E&S Management Plans

No.	Project E&S Management Plan	Aspects covered
003	Pollution Prevention and Control Plan (noise, dust, effluent discharges, hazardous materials	• General pollution prevention and protection measures • Pollution prevention and protection measures at hazardous materials storage, such as bunding storage areas, tank overfilling prevention measures, etc. • Spill prevention containment measures around sensitive equipment, installation of appropriate spill clean-up equipment and development of response

No.	Project E&S Management Plan	Aspects covered

	management	procedures
		• Measures at source to prevent pollutants from entering the pathway
		• Actions to be followed in case pollutants enter the pathway
		• Management of spill-contaminated soil
		• Wastewater discharge and management
		• Construction dust mitigation and monitoring
		• Noise management,
		  ○ Noise abatement/mitigation measures
		  ○ Noise monitoring
		• Hazardous materials storage and handling

004	Biodiversity Management Plan (inc. AIS ad topsoil management)	• Plan for implementing mitigation measures identified in the ESIAESIA related to the Project's impact on biodiversity. • Mitigation strategy (how the mitigation hierarchy has been followed) • Requirements for pre-construction check surveys • Management and monitoring measures during the construction phase of the project • Roles and responsibilities • Measures to avoid the introduction and/or spreading of invasive alien species

005	Waste Management Plan (for site and for disposal and management of demolition waste)	• Non-hazardous and hazardous waste management, including:
		  ○ Waste hierarchy implementation (i.e. reduction at source, reuse, recycling, energy recovery, responsible disposal);
		  ○ Identification and classification of wastes;
		  ○ Waste register;
		  ○ Waste handling (i.e. collection, segregation and containers, storage, treatment, transport and documentation, disposal);
		  ○ Waste duty of care process (waste transfer, waste consignment provisions);
		  ○ Monitoring and reporting.

006	Labour Management Plan including Worker Grievance Mechanism	• Training and skill development activities; • Employee grievance mechanism; • Worker accommodation management aspects • Measures for fair treatment, non-discrimination, and equal opportunity in employment. • Requirements related to the provision of safe and healthy working conditions and the health of workers • Management of potential communicable diseases associated with the construction workforce. • Behavioural code of conduct for workers when outside of work and interaction with the local community • Contractor employment practices conformance, reporting and monitoring • Management measures related to child labour, forced labour, and third-party workers.
007	Cultural Heritage Management Plan (including Chance Finds Procedure)	• Management of existing cultural heritage • Chance finds procedure • Chance finds training, management and response • Interface and coordination with relevant authorities
008	Stakeholder Engagement Plan (including external grievance mechanism)	• Stakeholder identification and mapping • Stakeholder analysis • Previous engagement activities • Stakeholder engagement plan and record-keeping • Grievance mechanism • Monitoring and evaluation

No.	Project E&S Management Plan	Aspects covered
		• Internal and external reporting • Roles and responsibilities
009 a	Occupational Health and Safety Management Plan	• Safety principles and philosophy • H&S policies and commitments • Project H&S objectives • H&S management system structure • H&S leadership, organization, competence, communication • Contractors H&SS • PPEPPE requirements and enforcement • Non-conformances and incident reporting, investigation and lessons learned • H&S audit & review • H&S performance monitoring/ improvement • H&S records and documents control
009 b		• Identify the potential negative impact of the Project at the level of the communities along the route; • Develop specific and achievable mitigation measures to avoid or reduce any negative impact on the communities along the route; • Develop the necessary tools and procedures for the management, monitoring and verification of the impacts on local communities • Set Key Performance Indicators
010	Traffic Management Plan	General management plan defining common control measures, standards and procedures for construction traffic management aimed at guiding contractors on applicable construction traffic planning and management requirements. • Site access and haulage routes (for general and over-dimensioned vehicles) • Road traffic management including on-site and off-site/public roads speed limits, vehicle inspection requirements, operating rules and procedures • Dust, air emissions, noise abatement requirements and measures • Access roads management • Road-related accidents prevention • Local traffic signage • Timing of deliveries • Road’s closure • Road’s cleaning • Abnormal load road safety and management requirements • Communication in advance of heavy and abnormal load construction traffic through communities • Training of drivers and equipment operators • Community awareness program on traffic-related risks, in line with SEP provisions • Monitoring system • Internal monitoring and reporting Contractor traffic and transportation management planning requirements.
011	Emergency Preparedness and Response Plan	Provision of a consistent and systematic approach to ensure effective control and management of emergencies that may be encountered during project development on project sites. • roles and responsibilities, chain-of-command and communication framework • decisional workflow in case of emergency • different emergency tiers response teams: • notification procedure • potential emergency scenarios and their management • media and public relations during emergency • training and drills requirements • emergency contact details

No.	Project E&S Management Plan	Aspects covered
012	Contractor Management Plan	• Subcontractor pre-qualification criteria • Subcontractor onboarding requirements • Define the approach to managing the E&S performance of contractors, subcontractors, and other third parties during the various phases of the project. • Program for audit of E&S performance of EPC contractors and subcontractors, specifying the frequency of audit (at least monthly during the construction phase), reporting and roles and responsibilities
013	Livelihoods Restoration Plan	• Livelihood restoration principles and activities • Impact identification • Eligibility and entitlements • Planning and implementation • Monitoring and evaluation • Accidental damages compensation process for future unforeseen impacts.
014	Security Management Plan	• Security arrangements roles and responsibilities • Site access (project personnel identification, visitors identification, vehicles identification etc.) • Security-related communication arrangements • Interface with host government agencies and public security forces • Provisions to ensure compliance with regulations and good industry practice regarding: o Security personnel selection and employment o Security personnel rules of conduct, o Security personnel training and equipment o Monitoring of compliance and investigation process of non-compliance acts • Security training program including: o Code of Conduct modules specific to security personnel o Voluntary Principles on Security and Human Rights • Grievance mechanism

6.4 CONTRACTOR-LEVEL E&S MANAGEMENT PLANS [PLAN – ELEMENT 4]

The EPC Contractor is responsible for the implementation of the E&S mitigation associated with the execution of the Project construction activities.

To ensure this, the EPC Contractor must define and implement their own E&S compliance monitoring and assurance processes for the Project. These will be outlined in EPC plans and topic-specific Contractor Management Plans (CMP).

CMP, in the sense used throughout this ESMP, is the generic term for the EPC Management Plans, Procedures and Method Statements defined and implemented by contractors and incorporating the mitigations addressing the specific E&S impacts associated with their operations, as guided by this ESMP and the Project Owner-level E&S Management Plans.

These E&S Management System components are represented in Figure 3 – Level C and referred to as Contractor Management Plans (CMP).

The EPC Contractor is required to ensure that all requirements set in the Project-level E&S Management Plans, and which are relevant to the EPC and their subcontractors' activities are transposed and detailed in the EPC-HSE PLAN and the CMPs.

The CMPs will comply with the ESIA package documents, the CR, and the Project Requirements Regulations and Standards referred to in section 4.0 of this ESMP, including national and EU regulations, EBRD PRs and IFC PSs.

The Project Owner will review and approve the EPC-HSE PLAN and the CMPs in line with the Project documents approval process and before work commences on site.

No construction work is allowed by the EPC or its subcontractors until the EPC-HSE Plan and CMPs are pre-approved by the Project Owner, in line with the Project's formal documents approval process.

6.4.1 EPC CONTRACTOR HSE PLAN (EPC-HSE PLAN)

The EPC-ESMP is the operational control document defining the EPC Contractor's self-verification and assurance processes to ensure the Project E&S commitments are implemented at the site level.

The EPC-ESMP will detail the roles and responsibilities, the self-verification and assurance processes at the EPC organization level to ensure the requirements of this Project ESMP and the E&S Commitments are met. This will include all aspects of staffing, roles and responsibilities, resources, self-verification and assurance processes, communication, and management of non-conformances.

The EPC-ESMP will be structured to provide the information in the following table.

Table 2-2 EPC-ESMP content

EPIC-HSE Plan Suggested Sections	**EPC-HSE Plan Required Content**
Introduction	• Purpose & objective • Reference to Owner ESMP and supporting plans and EPC E&S Policies and Procedures • Applicable E&S Requirements, Regulations and Standards
Project &S Management	• EPC Project E&S management concept • EPC E&S Project management documents (EPC-HSE Plan, CMPs, Subcontractor Method Statements, E&S requirements, etc.)
Project Organization	• Overall EPC E&S Project Organization • EPC E&S Staffing, Roles and Responsibilities
E&S Management Controls	• EPC E&S Self-verification (daily/weekly, etc., oversight inspections of own and subcontractor activities, joint inspections with Project Owner, monitoring) • EPC E&S Assurance (internal and external audits, management review etc.) • Action Tracking System (system for recording and monitoring of E&S corrective actions/measures until closure) • Non-conformity Notification, Recording and Corrective Action (E&S NCR system) • E&S Incident Reporting and Investigation • E&S Monitoring Program • E&S Reporting (daily, weekly, monthly, KPI reporting) • E&S Documentation Management (E&S records management)
Subcontractors Management	• Roles & responsibilities • Subcontractor &S management planning/method statement requirements • Subcontractor requirements for E&S self-monitoring and reporting to EPC
Communication Arrangements	• Internal Project communication arrangements (EPC – Project Owner communication) • External communication (communication with authorities, external Project stakeholders, etc.) • Emergency communication arrangements
E&S Training Program	• Types of E&S training • Training planning, delivery and tracking

EPIC-HSE Plan Suggested Sections	EPC-HSE Plan Required Content
Change Management[5]	• E&S Change Management Process (interfaces with overall Project Change Management process) • E&S assessment of Project/Design changes.

The structure provided in the table above is a suggestion only. While the EPC may alter the structure of the ESMP as needed to align with its own management system requirements, the above indicated content is to be included as a minimum and in a user-friendly and fit-for-purpose format.

6.4.2 EPC CONTRACTOR CONSTRUCTION MANAGEMENT PLANS (CMP)

The EPC Contractors CMPs required to be put in place must generally mirror in terms of topics addressed the Management Plans set at Project Owner-level (see Figure 3 – Level B). However, the CMPs are to further detail how the EPC Contractor and its subcontractors will implement the requirements outlined in the corresponding project ESMP and sub plans and in the EPC Contract.

As indicated above, to allow flexibility to the EPC Contractor in defining procedures in line with their own management system process, the mitigation measures addressing the specific E&S impacts may be defined in Management Plans, Procedures and Method Statements (generically referred to herein as CMPs), as deemed appropriate by the EPC Contractor. However, the EPC Contractor is to ensure that CMPs addressing the below-indicated specific topics are defined and implemented throughout the Project execution:

- Occupational Health and Safety Management
- Communication and consultation (in line with the Owner SEP)
- Traffic and Transport (on site and off site logistics)
- E&S management incorporating:
    - Pollution Prevention and Control (including, among others, air, noise, water supply and wastewater, biodiversity, spill prevention, contaminated land and hazardous materials management)
    - Contractor Management
    - Hazardous Materials Management
    - Waste Management
    - Water Management
    - Biodiversity Management
- Labour management incorporating:
    - Worker grievance mechanism
    - HR Policy / Labour Management (including employment, working conditions and worker accommodation aspects)
    - Recruitment and selection process (including local hiring)
    - Worker Grievance Procedure
    - Worker's accommodation plan
- Community health and safety management

[5] A process for requesting, determining feasibility, planning, implementing, and evaluating Project changes.

- Chance Finds
- Emergency Preparedness and Response
- Security management (general/applicable Project-wide and site-specific, as needed)
- Contractor management

In defining the mitigation and management measures to be covered by the above-indicated CMPs, the EPC Contractor will use as guidance, in addition to the present ESMP provisions, the Project ESIA and the CR provided as an Annex to the EPC Contract. Reference will also be made to the Owner's plans, and where appropriate, these may be adopted and used in the EPC documentation.

Vifor Wind Farm Project stakeholder engagement activities and community relationships will be managed by the Project Owner in line with the Project Stakeholder Engagement Plan.

The Contractor CMPs will be informed by the Project ESMP and supporting Sub-Plans (refer to section 2.6 above) and shall be generally structured to provide the following information:

- Objectives of the management plan/purpose and scope,
- Reference documents (indication of other Project-level documents and EPC CMPs of relevance for the management plan; reference to relevant applicable standards);
- Identification of Project activities/operations associated with the impacts addressed by the respective CMP and triggering the implementation of all or part of the respective CMP requirements;
- Description of management practices employed to implement impact mitigation and ensure accomplishment of related commitments;
- Roles and responsibilities;
- Subcontractors' requirements (including those addressing E&S aspects in the subcontractor method statements);
- CMP requirements implementation monitoring and reporting;
- Training needs.

6.5 GENERAL SITE MANAGEMENT

6.5.1 PROVISION OF SITE SERVICES

The Contractor must make provisions for and is ultimately responsible for providing a centralised approach to the management of all Contractor and sub-contractor requirements in the following areas:

- Site access (centralised access point and security at the power plant site and all satellite worksites)
- Provision of site utilities (power, water) to all worksites
- Site waste management (general and hazardous waste) (all worksites)
- Batching plants dumps sites (for inert waste), refuelling and workshop areas (all worksites)
- Site canteen and welfare (shade, water points, latrines etc.) facilities (for all workers at all worksites)
- Offsite accommodation
- Site medical and health facilities (The following emergency response provisions must be provided for the Project: permanent Clinic, full-time nurse, first aiders across all worksites.
- Further details on specific requirements are provided in the relevant sub plans.

6.5.2 SITE PLAN

The EPC-ESMP must include a site plan that must clearly show measures in place to address E&S requirements, including:

- The final layout of the plant
- Dedicated areas for centralised management of contractor and sub-contractor waste, hazardous materials, maintenance, workshops, refuelling etc.
- Mapping of all sensitive receptors (e.g. nearby residential properties) relevant to works
- On and offsite traffic management (including approved routes, laydown area and rest areas)
- Site wide laydown area (s), designated refuelling locations, temporary storage locations, welfare facilities, concrete batching plants
- Site vehicle access, delivery points and pedestrian access to the work with separation between both
- Location of site services (power and water) (so that these may be cross-referenced against the Environmental Authorisation)
- The detailed definition of the Construction Site limits, the limit of PPE wearing obligations and any specific area requiring particular measures
- The detailed definition of the limits of any other areas used by the Contractor as laydown, offices, parking, etc
- All facilities installed on such areas
- All temporary utilities, either underground or overhead
- Dedicated work area and storage areas
- Firefighting devices available on the site
- Location of worker accommodation facility (one)

6.5.3 SAFETY SIGNAGE

The EPC-ESMP must include a requirement for a safety notice board shall be placed at the entrance of all worksites at a location where it is visible to any person coming to work at the site. This safety board shall bear the safety statistics, the number of harm-free days, and other major statistics.

Project specific signage requirements set out under national Law must also be displayed including inter alia :

- Type of work to be performed
- Process number and Construction Licence number
- Complete address of the work site
- Identification of the Developer responsible for the Project
- Name of the Contractor responsible for the Project and registration information
- Address/location of Contractor registered office
- Construction schedule
- Contractor License or licence number
- Relevant emergency numbers

Signage must be erected within eight days following the issue of the Construction Licence and with prior approval of the Municipality, and information must be displayed in English and Romanian.

In addition, the Contractor must notify the relevant authorities of the proposed start date before works commence. The Contractor is responsible for the control of access to all satellite worksites and delivers the access authorization to any Visitor or Worker. The Contractor shall implement a procedure for authorizing site access which can differ depending on the type of access granted. Specific requirements are also outlined in the Security Management Plan.

Project personnel shall not gain access to land outside approved areas of operation without prior consultation with Employer CLO.

No activities that cause damage may be undertaken without prior approval by the regulatory authority, and prior communication with an agreement on appropriate compensation by the affected person(s) and will need to be conducted in accordance with the approved RPF.

6.5.4 PROJECT SCHEDULE

The EPC-ESMP must provide a Project schedule that includes consideration of E&S matters including:

- Proposed dates by when any pre-construction survey work should be completed (as relevant)
- Mobilisation date and description of mobilisation activities
- Proposed date and sequence of planned works with specific reference to those activities that may have adverse impact on the environment or community (e.g. noisy work, increase traffic movements etc.)
- Project and seasonal constraints including:
    - Restrict construction work outside the hours of 06:00 and 18h00 unless approved by the Employer
    - Possible restrictions on operations in accordance with the requirements outlined in the Transportation Management Sub-plan.

7 E&S PROJECT ORGANISATION [PLAN - ELEMENT 5]

7.1 OBJECTIVES

As per IFC Performance Standard 1 (para. 17 - 19), the client, in collaboration with appropriate and relevant third parties, will establish, maintain, and strengthen as necessary an organisational structure that defines roles, responsibilities, and authority to implement the ESMS. Specific personnel, including management representative(s), with clear lines of responsibility and authority, should be designated. Key environmental and social responsibilities should be well defined and communicated to the relevant personnel and the rest of the client's organisation. Sufficient management sponsorship and human and financial resources will be provided on an ongoing basis to achieve effective and continuous environmental and social performance.

7.2 PROJECT OWNER E&S MANAGEMENT ORGANIZATION

The Project Owner's E&S management roles are represented in Figure 4.

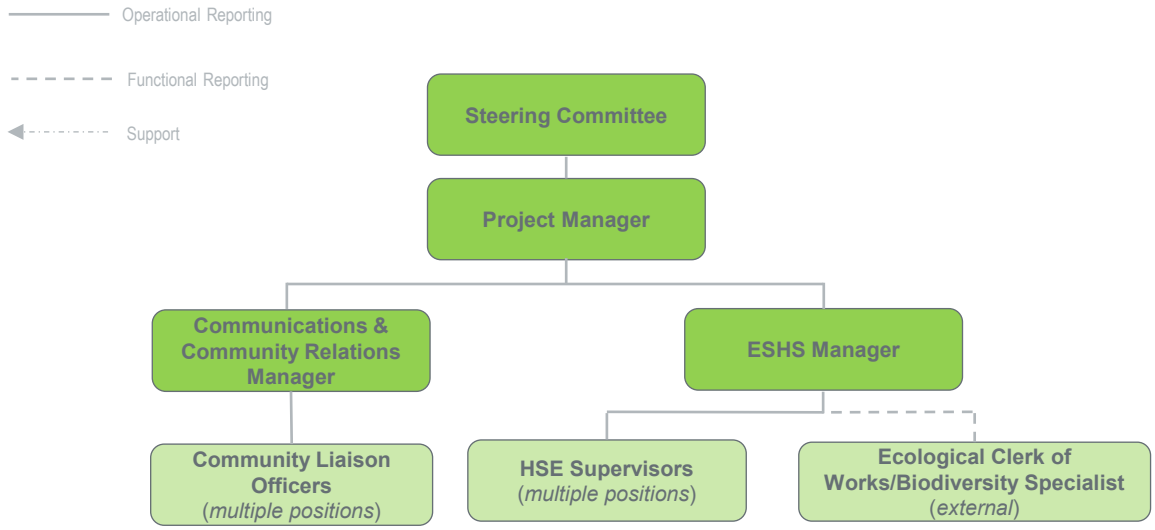


Figure 4: Project Owner's Farm Project E&S Organization Chart

7.2.1 PROJECT OWNER'S E&S ROLES AND RESPONSIBILITIES

The Project Owner is ultimately responsible for ensuring that all Project activities comply with the Project E&S policies, regulations and standards. The Project Owner will establish an appropriate organizational structure, responsibilities, and practices and ensure the resources necessary for the E&S management during the Project execution.

Specific main responsibilities of key Project Owners' staff are summarized in Table 3-1 below. The staff job descriptions detailing individual responsibilities will be aligned with the requirements summarized herein.

Table 3-1 Key Project Owner staff and associated responsibilities

Role	Responsibility
Project Manager	• Overall accountability for the Project, including delivery in line with applicable national and international standards. • Ensures allocation of sufficient resources for the ESMP implementation

Role	Responsibility
	including for E&S organization, permitting, training, equipment and qualified personnel. • Ultimate responsibility for ensuring implementation of required corrective actions including in response to identified E&S non-compliances or incidents. • Ensures periodical review of the ESMP effectiveness in line with the provisions of this plan. • Provide E&S resources for implementation
ESHS Manager	• Appropriately qualified professional familiar with E&S aspects associated with internationally financed projects implementation. • Performing duties both at corporate level and partially on site. • Review and approve ESMS, • Lead on potential updates and implementation. • Coordinate Owner site inspections and audits, • Implement Owner monitoring programs, • Oversight on record and document maintenance, • Responsible for oversight of corrective actions • Allocate E&S resources for implementation of the Project E&S management requirements. • Responsible for identifying any E&S specialised expert support required at various project implementation stages and sourcing these as needed; • Inform EPC and Contractors on E&S responsibilities as defined in this ESMP and detailed in the topic-specific Management Plans and ensure these are understood and implemented throughout all stages. • Ensure that E&S risks are systematically identified and managed (assessed avoided or mitigated) • Ensure the review and acceptance by Project Owner of EPC Contractor E&S Management Plans • Ensure the E&S oversight of EPC Contractors including training, auditing and corrective actions. • Manage the &S team's budget and ensure that E&S team's activities are effectively executed. • Provide the Project management team with E&S management advice, guidance and assurance. • Communicate the content of this ESMP (including any updates) to the Project Owner and EPC Contractor teams and act as the focal point to promote implementation, performance monitoring and provide guidance and support. • Manage the review and acceptance of EPC Contractor E&S Management Plans. • Inform EPC Contractors on E&S responsibilities as defined in this plan and detailed in the Project E&S Management Plans and ensure these are understood and implemented throughout all construction stages. • Act as focal point for EPC Contractor &S oversight in accordance with this ESMP. • Ensure that all &S-related incidents are reported and dealt with effectively and lessons learned are shared in accordance with the Project incident reporting procedure. • Support with organization of and participation in the review and audits of the EPC contractor &S performance with respect to the requirements of this ESMP.

Role	Responsibility

Communications and community Relations Manager (not site based)	• Appropriately qualified professional familiar with social aspects associated with internationally financed projects implementation.
	• Performing duties both at corporate level and on site.
	• Provide functional support to the field staff to implement the social requirements of this ESMP and of the Project Owner's management system;
	• Coordinate the implementation of the Stakeholder Engagement Plan;
	• Provide timely information to communities on all Project works through regular meetings with stakeholders and ensure that long term relationships are not negatively impacted.
	• Provide information on potential issues with local communities and stakeholders and contribute to implementing specific measures to prevent and mitigate risks.
	• Identify key stakeholders, requiring engagement in the frame of Project stakeholder engagement processes/activities and update regularly the stakeholder mapping in response to stakeholders' activities and their relationship with the Project.
	• Monitor local developments with potential to impact Project activities, and report to the Project Manager.
	• Ensure that stakeholder engagement activities are documented and evidence (e.g. Minutes of Meetings) are kept on file.
	• Perform regular review and monitoring of SEP implementation.
	• Coordinate and manage implementation of the Project Grievance Mechanism.
	  ○ Ensure Project Grievance Committee Meetings are formally documented and recorded;
	  ○ Coordinate preparation of responses to complainants and agree content with other members of the Project Grievance Committee;
	  ○ Responsible for ensuring responses to complainants are provided in line with the Grievance Mechanism provisions
	  ○ Report to Project Management Team on grievance management.
	• Responsible for the successful implementation of Project Owner's community investment program.
	• Oversee Project external communications;
	• Responsible for the Project information disclosure, mass media coverage/press releases.

HSE Supervisors *(multiple positions, as needed)*	• Appropriately qualified local/national professionals reporting to E&S Manager. • Based on site permanently for the duration of the construction works. • Perform oversight inspections of the EPC Contractors' and subcontractors' activities to ensure they align with Project, health, safety and environmental management requirements and with the CMPs/method statements provisions pertaining to health, safety and environment. • Provide feedback on inspections findings to the E&S Manager. • Provide HSE advice and training/deliver toolbox talks to field teams. • Report on HSE compliance and corrective actions implementation to the E&S Manager. • Record HSE incidents and follow up on closure by EPC. • Participate in internal and external HSE audits. • Report to the E&S Manager on daily basis and in agreed format on all health, safety and environmental matters and activities performed.

Role	Responsibility
Community Liaison Officer (including availability of female officer)	• Appropriately qualified local professional/local community member reporting to the Communications & Community Relations Manager. • Based on site permanently for the duration of the construction works. • Acts as local liaison between the Project and the community/local stakeholders and maintains positive relationship with them. • Provide timely information to local community members on all Project works through regular meetings with stakeholders and ensure that long term relationships are not negatively impacted. • Provide information to Project management on potential issues with local communities and stakeholders and contribute to implementing specific measures to prevent and mitigate associated risks • Take active role in identification of community needs and assist in the decision process regarding the Project's community investment program. Contribute to the successful implementation of the Project's community investment program. • Identify key stakeholders, requiring engagement in the frame of the Project stakeholder engagement processes/activities and support with updating regularly the stakeholder mapping in response to stakeholders' activities and their relationship with the Project. • Monitor local community developments with potential to impact Project activities, and report to the Communications & Community Relations Manager. • Support with the Grievance Mechanism implementation at field level. Assist local community members in filing their grievances as needed. • Report on all activities performed to the Communications & Community Relations Manager on daily basis and agreed format.
Supporting Roles - third party	
GBVH (third party)	• Provide training to site staff • Supporting preparation of GBVH induction • Coordinate survivor centric referral mechanism for survivors of project related GBVH. • Receive and process project related GBVH grievances including obtaining informed consent, conducting investigation process and proposing relevant sanctions.
Resettlement Consultant (third party)	• Identify impacted receptors. (project affected people) • Livelihoods census survey • Impact assessment • Engagement with impacted project affected people • Define entitlements matrix • Grievance management • Implement compensation and livelihood restoration program (as needed) • Monitoring, evaluation and reporting against livelihood indicators
Cultural heritage Specialist (third party)	• Support the implementation of the chance finds procedure (if required) • Refer to the cultural heritage management plan for further detail.
Ecological Clerk of Works/ Biodiversity Specialist *(own staff or*	• Appropriately qualified biodiversity specialist familiar with internationally financed projects implementation requirements. • Reports to HSE Manager • Based on site permanently for the duration of the ecological works • Support with biodiversity management planning requirements implementation

Role	Responsibility
contracted specialist)	• Support with definition of biodiversity surveys methodologies (e.g. pre-construction/post-construction surveys etc.) and support with their implementation and adequate documentation. • Definition of bespoke method statements for works within sensitive habitats e.g. vegetation clearance (including check survey methods), flora translocation (if required), fauna translocation; and vegetation re-instatement, as applicable. • Support with supervision of implementation by on-site contractors of requirements in method statements and direct construction teams in their implementation. • Support with supervision of contractors to ensure construction works are performed only in permitted project footprint and prevent that adjacent areas are affected. • Support with provision of toolbox talks to contractors to explain ecological sensitivities of the site and proposed works/methodology to ensure compliance. • Support with verification that Biodiversity Management Plan provisions are followed. • Support with construction works monitoring • Support with ensuring that findings from the field are reported back to relevant project stakeholders at regular intervals. • Support with reviewing species data in the field to ensure that the receptors selected for monitoring are appropriate. • Support with undertaking protected species check surveys • Support with identification of suitable receptor sites for species translocation • Provide oversight and direction to staff/contractors undertaking species translocations. • Support with undertaking post-construction monitoring.

7.3 EPC CONTRACTOR E&S ROLES AND RESPONSIBILITIES

It is EPC Contractor`s responsibility to ensure that E&S compliance is achieved according to the requirements and processes defined in this ESMP. In attaining this objective, the EPC Contractor establishes and maintains through its own E&S Management System a documented process to identify risks and impacts, implements adequate management measures to mitigate these in line with the Project Requirements, Regulations and Standards specified in section 2.2 of this ESMP. EPC Contractor E&S monitoring of its own activities and its subcontractors E&S performance is referred to as ‘self-verification’ and forms the first level of E&S compliance monitoring under this ESMP.

The EPC Contractor is responsible for:

- Self-verification of its own compliance by maintaining a system to manage E&S aspects and impacts in line with Project Owner’s and its own management system requirements;
- Ensuring that all E&S non-conformances and incidents are reported and dealt with effectively and that lessons are learned;
- Ensuring their organizations have adequate resources and expertise for E&S compliance monitoring and control to meet the ESMP requirements;
- Keeping the Project Owner fully informed of any E&S issues;
- Recording and reporting monitoring observations, required actions and raising non-conformance reports where appropriate;

- Instructing own and subcontractors' staff in their responsibilities with respect to compliance assurance and incident reporting and response;
- Ensure facilitation of any grievances they may receive into the Project Grievance Mechanism
- Cooperating with the Project Owner concerning E&S compliance assurance activities;
- Participating in joint inspections, performance reviews and audits as required by the Project Owner;
- Providing Project Owner with access to monitoring records (including all relevant documentation and databases) as required;
- Ensuring adequate expertise, planning, and resources are in place to appropriately identify E&S risks sufficiently in advance of construction in order to ensure compliance;
- Identifying E&S risks as part of its planning processes and through implementation of appropriate mitigation measures and communicating these to its workforce;
- Reporting to the Project Owner on E&S performance, including KPIs on weekly and monthly basis in a commonly agreed format;
- Maintaining updated registers that capture the range of compliance monitoring and assurance information necessary to demonstrate that Project E&S standards are being met during construction works execution and reporting on this to the Project Owner.

To ensure implementation of the above, the EPC Contractor is required to structure their organization to include sufficient and adequately qualified E&S staff. The EPC Contractor is responsible for determining the required number of E&S personnel to ensure that Project E&S policies, regulations and standards are met throughout works execution.

Furthermore, the EPC Contractor is responsible to ensure that their subcontractors implement throughout their Project activities the requirements set forth in this ESMP and subordinated plans. For this purpose, the EPC Contactor must put in place adequate, documented processes for supervising and monitoring subcontractor responsibilities.

EPC Contractor's E&S team is to include appropriately qualified personnel covering the following roles (individual positions may combine multiple roles as appropriate):

- Human resources manager
- HSE Manager(s) (responsibilities including Environmental, Social, Health and Safety, and Cultural Heritage aspects);
- E&S Supervisors
    - multiple positions as needed;
    - to ensure the permanent presence of one E&S Supervisor on each construction work site and each shift and to maintain a 1:50 supervisor-to-worker ratio as a minimum.

7.3.1 EPC E&S ROELS AND RESPONSIBILITIES

The EPC Contractor is responsible for ensuring that all Project activities comply with the Project E&S policies, regulations and standards. The EPC Contractor will, therefore, establish an appropriate organizational structure, responsibilities, and practices and will ensure the resources necessary for the E&S management during the Project execution.

The specific responsibilities of key EPC staff are summarized in the table below.

Roles	Responsibility
Site Manager	• Fully support the implementation of the E&S Policy and the internally developed ESMS; • Ensure that the E&S Policy is included/referenced as part of sub-contractor agreements; • Promote a positive environmental & social culture and good practices by personal example and leadership; • Review and approve EPC contractor environmental and social management budgets, resourcing and staffing; • Ensure resources (human and financial) are allocated appropriately in practice to manage the ESMS; • Conduct regular site tours that include a specific focus on E&S elements; • Promote discussion of E&S management at team meetings • Monitor and report on environmental management and performance.
HSE Manager	• Fully support the implementation of the E&S Policy; • Prepare, implement and manage the EPC contractor / Operator project specific ESMS; • Engage with the project management regularly concerning E&S issues, risks and compliance management; • Oversee and ensure execution of the environmental and social management programmes by other project parties (such as sub-contractors and key suppliers); • Review EPC contractor personnel, qualifications, competency and environmental performance; • Monitor the Project to ensure environmental and social compliance (including for sub-contractors and suppliers - as per the scope of the ESMS); • Advise management on matters about the environmental and/or social elements; • Investigate environmental and social issues, incidents and non-conformances, implement corrective actions and report those to the management/relevant authorities; • Maintain applicable environmental and social records as required by the ESMS (e.g. incident registers, NCR reports, corrective action reports, grievance register etc.); • Ensure monitoring programmes are implemented by qualified personnel and report the results to the Project management for review and as a basis for continuous improvement; • Display and monitor site bulletin boards to ensure they remain 'live' and 'up to date' with relevant environmental & social information; • Coordinate, plan, formulate and/or deliver environmental and social induction training to all project personnel (including subcontractors) as well as regular toolbox talk environmental training sessions; • Organise programmes and activities to promote environmentally responsible conduct in the prevention of injury, ill health and environmental impact throughout the workforce; • Stop any unsafe activity which is not compliant with environmental legislation or lender requirements, and correct such work practice and/or conditions before allowing work to resume/commence; • Act as point of contact for any sub-contractor concerning environmental issues; • Ensure that each sub-contractor is aware, compliant and implementing the requirements of the ESMPs; • Review subcontractor's personnel, qualifications, competency and environmental performance; and • Undertake regular internal ESMS audits to assess compliance and implement

	corrective & preventative actions – audits are to include all sub-contractors at the project. •
E&S Supervisors	• Fully support the implementation of the project policies; • Implement and assist management of the EPC contractor project specific ESMS; • Work with and engage with the EPC HSE/ Manager regularly concerning E&S management; • Actively ensure that environmental and social management programmes by other project parties are being undertaken as per project requirements (such as sub-contractors and key suppliers); • Monitor the Project to ensure environmental and social compliance (including for sub-contractors and suppliers - as per the scope of the ESMS); • Advise HSE/E&S Manager on matters pertaining to the environmental and/or social elements; • Actively investigate environmental and social issues, incidents and non-conformances; implement corrective actions; • Maintain applicable environmental and social records as required by the ESMS (e.g. incident registers, NCR reports, corrective action reports, grievance register etc.); • Ensure monitoring programmes are undertaken and reported; • Prepare and monitor site bulletin boards to ensure they remain 'live' and 'up to date' with relevant environmental & social information; • Alongside the HSE/E&S Manager, coordinate, plan, formulate and/or deliver environmental and social induction training to all project personnel (including sub-contractors) as well as regular toolbox talk environmental training sessions; • Undertake programmes and activities to promote environmentally responsible conduct in the prevention of injury, ill health and environmental impact throughout the workforce; • Stop any unsafe activity which is not compliant with environmental legislation or lender requirements, and correct such work practice and/or conditions before allowing work to resume/commence; • Alongside the HSE/E&S Manager, act as point of contact for any sub-contractor with regard to environmental issues; • Monitor on a daily basis that sub-contractor is aware, compliant and implementing the requirements of the ESMPs; • Alongside the HSE/E&S Manager, review subcontractor's personnel, qualifications, competency and environmental performance; and • Alongside the HSE/E&S Manager, undertake regular internal ESMS audits to assess compliance and implement corrective & preventative actions – audits are to include all sub-contractors at the project.

In case, during project execution, the monitoring of EPC Contractor’s E&S performance as performed by the Project Owner indicates insufficient E&S oversight, compliance assurance resources or practices by the EPC or subcontractors, the Project Owner is entitled to enforce required corrective actions on the EPC Contractor. This may include requiring the EPC Contractor to allocate additional E&S staff and resources.

8 EMERGENCY PREPAREDNESS AND RESPONSE [DO- ELEMENT 6]

8.1 OBJECTIVES

As per IFC PS1 (para. 20 & 21), 'Where the project involves specifically identified physical elements, aspects and facilities that are likely to generate impacts, the ESMS will establish and maintain an emergency preparedness and response system so that the client, in collaboration with appropriate and relevant third parties, will be prepared to respond to accidental and emergencies associated with the project in a manner appropriate to prevent and mitigate any harm to people and/or the environment. This preparation will include identifying areas where accidents and emergencies may occur, communities and individuals that may be impacted, response procedures, provision of equipment and resources, designation of responsibilities, communication, including that with potentially Affected Communities, and periodic training to ensure effective response. The emergency preparedness and response activities will be periodically reviewed and revised, as necessary, to reflect changing conditions.

Where applicable, the client will also assist and collaborate with the potentially Affected Communities (see PS4) and the local government agencies in their preparations to respond effectively to emergencies, especially when their participation and collaboration are necessary to ensure an effective response. If local government agencies have little or no capacity to respond effectively, the client will play an active role in preparing for and responding to emergencies associated with the project. The client will document its emergency preparedness and response activities, resources, and responsibilities and provide appropriate information to potentially affected communities and relevant government agencies.

8.2 PROJECT COMPANY EPRP

The Project Owner sets out minimum requirements for contractor emergency response in the Project Owner EPRP (VIFOR_ESMP_11_EPRP) based on the outcomes of the ESIA process and conditions in the CR.

The Project Owner oversees the contractor's emergency plans and will also ensure that relevant interested parties (e.g. neighbouring communities/ facilities, emergency services) are consulted and are otherwise considered as part of response actions.

The Project Owner has an internal requirement for contractors to develop an emergency preparedness and response plan (EPRP) and EPRP drill matrix. The EPC contractor will conduct regular (at least monthly) drills to test its plans to respond to different emergencies, including, where practicable, involving relevant third parties. Any related specialist training (as required) and appropriate emergency response equipment use shall be separate from this and managed through the training and competence matrix (Element 7).

8.3 CONTRACTOR EPRP

The EPC contractor must develop a site-specific EPRP aligned with the Project Owner's EPRP, which considers preparedness, contingency and planning measures regarding reasonably foreseeable environmental, social, health and safety emergencies. The plan will allow for the following:

- Establishment of an emergency response team
- Identification of reasonably foreseeable emergencies;
- Collaborate (where appropriate) with relevant third parties;
- Training of workers and informing affected communities;
- Provisions for potential emergencies; and

- Respond to such emergencies in coordination with third parties (as applicable).

The EPC contractor is required to provide the necessary equipment and training for implementing the requirements of the EPRP and to assign responsibilities across its personnel and subcontractor personnel for implementing the needs of the EPRP.

The requirements of the EPRP will be communicated to all persons on site via induction training, notices and regular refresher updates.

8.3.1 EMERGENCY INCIDENTS

An environmental or social incident is a planned or unplanned event or set of circumstances as a consequence of which a social issue/disruption, pollution or an adverse environmental impact has occurred or is occurring.

The EPC contractor's EPRP includes incident response and reporting provisions. It is noted that the Project Owner has obligations to report incidents to appropriate third parties, including the regulator and lenders. Incidents will be reported on an Incident Report Form.

- Incident Report Template (VIFOR_ESMS_Forms_F08)

9 E&S COMPETENCE AND TRAINING [DO – ELEMENT 7]

9.1 OBJECTIVES

As per IFC Performance Standard 1 (para. 18). Personnel within the client's organisation with direct responsibility for the project's environmental and social performance will have the knowledge, skills, and experience necessary to perform their work, including current knowledge of the host country's regulatory requirements and the applicable requirements of Performance Standards 1 through 8. Personnel will also possess the knowledge, skills, and experience to implement the specific measures and actions required under the ESMS and the methods required to perform the actions competently and efficiently.'

9.2 OWNER TRAINING REQUIREMENTS

The Project Owner is committed to ensuring that E&S training is delivered to all staff as required for delivering their roles. In the frame of the recruitment process, Project staff are verified for competency and experience. Following employment with the Project, the staff receive adequate induction and ongoing E&S training according to a training plan.

9.3 EPC TRAINING REQUIREMENTS

The EPC Contractor must design and deliver relevant training to all site employees and subcontractors employees. Training may be provided via the following mechanisms:

- Site-specific induction;
- Job/activity-specific training (including management training and prequalified training requirements, e.g. forklift driver licence);
- Setting to work briefing;
- Toolbox talks; and
- Safety stand-downs.

The EPC Contractor’s E&S training and competency requirements are contractually specified.

EPC Contractor shall ensure that all construction employees (own and subcontractor staff) are adequately qualified and have the E&S knowledge and skills required to execute their work duties.

Before the commencement of the work, the EPC Contractor shall submit a Training Matrix (VIFOR_ESMS_Forms_F05) identifying specific training requirements against each job title for review and acceptance by the Project Owner.

The Training Matrix is to be based on an analysis of training requirements and should comprise at least the following:

- an induction training program to be delivered to all personnel (own and subcontractor staff), vendor representatives and site visitors;
- general and job/task-specific training as needed for performing the duties to which the person (own and subcontractor staff) is assigned.

The Training Matrix will be based on a Competency Matrix. The Competency Matrix is to be developed as a tool documenting and comparing the required competencies for a position with the existing skill level of the employees performing the roles and shall be used to determine the training needs. The Competency Matrix is also to be used to manage people's development.

The Competency/ Training Matrix provides the mechanism to ensure that training is timely delivered and that the training program is effective. For this purpose, the EPC Contractor is to perform regular evaluations throughout the construction works period to ensure that the Training Plan has achieved its objectives i.e., all staff (own and subcontractor employees) are suitably qualified, competent and fit for

their job duties. The frequency and timing of such evaluations is to be determined by the EPC Contractor and subject to Project Owner's approval.

The Project Owner will review the implementation of E&S training requirements throughout the contract period according to the provisions of this ESMP.

9.4 INDUCTION TRAINING

Mandatory induction training must be provided to all employees before accessing or starting work on site. The EPC Contractor is responsible for providing ALL on-site induction training for EPC Contractor and Subcontractor workers and visitors. It must develop and continually maintain a register recording attendance at induction training throughout the construction period for its workforce, subcontractors, and visitors. Induction training must cover all aspects of the Owner ESMP and be provided in an appropriate language or language, including English. The induction training aims to make Project staff aware of the actual or potential actual or potential E&S risks associated with their work activities, their behaviour, and of the potential consequences of departure from the Project E&S procedures.

9.5 SPECIALIST TRAINING

In addition to the induction, the new Project staff will further undertake specific E&S training commensurate with their roles. Employed training process shall take into account different levels of responsibility, ability, language skills, and risks associated with each position.

The Contractor must define competency requirements and document its own training needs (and that of its Sub-contractors) which must be continually reviewed and updated to meet project requirements. A template for Project training matrix is provided in Forms and Templates.

9.6 SETTING TO WORK / TOOLBOX TALKS

Ongoing training and refreshers must be provided by the Contractor through daily setting to work briefings and / or toolbox talks conducted in the language understood by workers (translators used if necessary).

9.7 HR TRAINING

The Contractor is responsible for ensuring that ALL employees (Contractor and sub-contractor) have an induction with HR representative prior to start of work on site. The purpose of the meeting is to ensure that the employee is aware of their contract obligations and provisions including rights connected with overtime, pay, working hours, rest breaks etc

9.8 TRAINING RECORDS

Written records of all training activities including toolbox talks, must be maintained by the Contractor, identifying type of training, content, who provided the training, and signed attendance register.

A system for evaluating the effectiveness of the training or action taken will be implemented by the EPC Contractor. Training records will be documented and held on file.

EPC Contractor and service providers are contractually bound to implement specified E&S training requirements.

10 OPERATIONS CONTROL [DO – ELEMENT 8]

10.1 OBJECTIVES

As outlined above, the ESMS requirements are split between the responsibilities and management activities of the Project Company and the EPC contractor. The ESMS document structures are shown in the tables as follows

10.2 REQUIREMETNS

For compliance with the project Owner ESMP, the EPC Contractor must include, although not limited to, the following plans as listed below:

- Contractor E&S Policy
- EPC-ESMP (describing the EPC-ESMS related to risk assessment, communication (meetings), sub-contractor management, inspections, auditing, training, reporting, review, management of change, roles and responsibilities
- Human Resource Policy (see below)
- Supporting plans and procedures
- Workers Code of Conduct and workers grievance mechanism,
- E&S Induction
- Workers Grievance Mechanism (WGM) Procedures for legal review and obligations including list of applicable legal regulations and standards
- Procedure for E&S risk identification, assessment and control
- Procedure setting out E&S Competencies, Organisational roles and responsibilities and CV's for all key E&S personnel
- Site E&S communication procedure (EHS meetings (internal) and links to Owner Stakeholder engagement plan)
- Procedures for sub-contractor management
- Procedure for fuel and chemical uploading, spill control and clean-up
- Procedures for inspections, monitoring, auditing and reporting (EHS and labour)
- Procedures incident and accident reporting (and corrective action management)
- Procedures for training (all E&S topics)
- Procedures for management of change (integration with site wide change procedure)
- Procedures for data management (integration with site wide data management system)

The EPC contractor's HR Policy shall include, but not be limited to the following items:

- Policy manual and formal policies for implementation on topics of gender, equal opportunity, employment and non-discrimination, child labour, forced labour, migrant labour, freedom of association, workers' representatives, trade union.
- Statement on employee code of ethics/code of conduct including receipt of gifts, corruption, external dealings and Gender Based Violence (GBV)/ Sexual Exploitation and Abuse (SEA)/ Violence against Children (VAC)/ Sexual Harassment (SH) Code of Conduct.
- Description of means for management of personnel records with the correct level of confidentiality.

- Job descriptions for all specific duties and responsibilities (including qualifications) required for the Project, including training requirements.
- Statement on compensation and benefits that complies with national laws and IFC PS2, including a defined system for administering and tracking salary payments (including overtime payments).
- Clearly defined procedures for defining working hours, rest periods, holiday pay, overtime, sick pay, maternity pay, allowances, accommodation payments, leave entitlements. and means for payment that align with PS2.
- Statement / policies relating to privacy expectations, discrimination, bullying and harassment, equality and diversity, health and safety expectations for the workplace, including GBV/SEA.
- Statement on workplace safety specifically standards for workplace violence, drug and alcohol use including expectations for testing, smoking Policy, the use and carrying of weapons, and disciplinary actions.
- learly defined Policy on dealing with grievances and harassment (e.g. in the form of a WGM.
- Procedures relating to fatality or medical discharge.
- Termination and redundancy policy.

The EPC employment plan shall include:

- Outline of recruitment and selection process that prioritises local workers, assures fairness to all applicants and compliance with all non-discrimination requirements and aligns with requirements of ESIA; and
- Hiring policy including procedures for checking minimum age, eligibility to work, qualifications for the role and where appropriate background/security checks.

10.3 MANAGEMENT OF CHANGE

The process in place to manage changes by the Contractor impacting E&S aspects of the Project are integrated in the overall change management process applicable to all Project Changes.

Management of E&S impacts resulting from proposed changes addressed in this ESMP section include:

- new planned activities or processes and or changes in project activities, design or footprint leading to potential impacts that were not subject to assessment as part of the Project ESIA package;
- changes to E&S management, mitigation and monitoring commitments not considered in the Project ESIA package;
- changes/updates of legal and regulatory requirements, technical codes and business objectives that may trigger potential impacts that were not subject to assessment as part of the Project ESIA.

Triggers for consideration in relation to changes specified above may include:

- Design refinement or detailed design outcomes
- Changes in construction methodologies;
- Field obstacles during construction;
- Results of further field surveys and monitoring;
- Comments/concerns submitted by public/stakeholders/lenders;
- Changes in regulations or requirements by regulatory bodies.

The Management of Change provides for a simple &S management of change process, as represented in Figure 5 below.

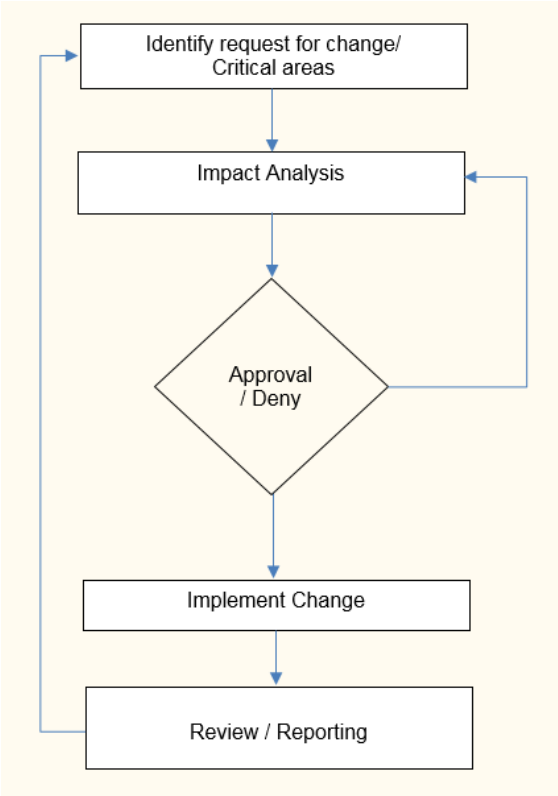


Figure 5: E&S Change Management Process

The E&S change management process is managed by the E&S Manager and comprises the following main steps.

Change Identification

E&S changes are identified various ways, including requests by the EPC, engineering, construction teams and are summarised in a Management of Change Form.

Change Impact Analysis and Notification of Changes

Upon receiving the Management of Change Form, the Contractor HSE Manager with the support of the E&S Specialist undertakes performs:

- An assessment of proposed change risks
- A screening review of any proposed changes that have the potential to give rise to new or additional significant impacts (positive or negative) which differ to those identified as part of the ESIA Package.

The Screening will be performed by/under the direction of the E&S Manager with involvement, as warranted, of other Project Owner staff and EPC Contractor Environmental Expert/Design Team, and/or with support from external specialized consultants. To assist with the review, a Change Screening Matrix will be used.

The potential outcomes of the Changes Screening can be grouped in 3 tiers in relation to environmental and social impacts (in line with the corresponding definitions in the ESIA package) as follows:

- Tier 1 Changes – Changes where the potential impact of the change prior to mitigation will be no more than minor.
- Tier 2 Changes – Changes where the potential impact of the change prior to mitigation will be moderate.
- Tier 3 Changes – Change were the potential impact of the change prior to mitigation will be major.

Tier 1 Changes will be implemented by the Project Owner without notifying the Vifor Wind Farm Project lenders.

For Tier 2 Changes, Project Owner will inform the Project Lenders of the change but will not have to secure their approval prior to implementing the change.

For Tier 3 Changes, Project Owner will seek approval from the Project Lenders prior to implementing the change.

The following changes will be considered as Tier 3 Changes:

- Changes to the Project design and footprint or activity that may result in a potential new major impact, or elevate an impact already assessed to a potential major impact.
- Changes in commitments to mitigate or avoid potential impacts that may result in a potential new major impact.

11 COMMUNICATION, PARTICPATION AND CONSULTATION [DO – ELEMENT 9]

11.1 OBJECTIVES

IFC PS 1 requires communication to be maintained at all stages of the Project/Asset lifecycle to ensure that personnel at the appropriate level and function know and understand their E&S obligations and information. The purpose of stakeholder engagement is to establish and maintain a constructive relationship with various external stakeholders over the life of the project and is an integral part of an efficient and adaptive ESMS. All stakeholders, internal and external, must be aware of the ESMS and relevant obligations.

11.2 COMMUNICAITON DOCUMENTATION

11.2.1 INTERNAL COMMUNICATION

During the construction phase, internal communication requirements between Project Owner, the EPC contractor, and the general workforce on E&S matters and the needs of the ESMS are outlined in the ESMP.

This includes requirements for regular E&S meetings, audits, inspections, reporting, and posting key information in visible locations around the work site, both on performance and areas for continual improvement.

The EPC contractor must establish and maintain a procedure for internal communications regarding E&S information. Internal communications, including emails, meetings, and bulletin boards, will inform workers of the E&S objectives, how they are expected to contribute, and their responsibilities.

Through project induction and other training, workers will be informed of all ESMS-related issues and processes to improve performance and reduce risks (Element 7). Information will be shared with external parties as required by law and as summarised in the Project Commitments Register.

Under the Project ESMP, the EPC contractor must develop a worker grievance redress mechanism to transparently and efficiently address worker concerns.

11.3 EXTERNAL COMMUNICATION

A Stakeholder Engagement Plan (VIFOR_ESMP_08_SEP))has been developed, which will be implemented during construction and operation. The SEP aligned with the requirements of IFC Stakeholder Engagement: A Good Practice Handbook for Companies doing Business in Emerging Markets (2007). The SEP maps stakeholder groups and describes the planned engagement process for those affected by the development or those interested in the Project during the development, construction, and operations phase. In all cases, the SEP is a living document to be continually updated (at least annually) over the Project duration.

During the construction phase, the SEP:

- Identifies stakeholders most likely to be affected by construction;
- Notifies local stakeholders of proposed activities and changes to schedules;
- Gets community liaison staff on the ground quickly;
- Aims for rapid response times in resolving grievances;
- Reports to stakeholders on the progress of environmental and social management programmes regularly; and

- Manages risks to stakeholder relations from contractors.

in all cases, communication will be performed in a relevant language, using culturally appropriate means and considering the specific needs of relevant vulnerable and marginalised groups in the project area of influence in particular allowing access for women to stakeholder engagement and livelihood restoration activities. Specific requirements for stakeholder engagement with project-affected people are also managed following the LRP.

11.3.1 11.1.3 GRIEVANCE MECHANISM

The SEP includes an external grievance mechanism to allow local community complaints to be raised in a transparent process. The Social Manager will manage the community grievance mechanism, and it must be widely disclosed to relevant stakeholders. All grievances will be registered on the grievance form and logged in a grievance log maintained by the CLO (Grievance Manager). The CLO may convene a grievance committee to resolve complex grievances. The composition of the grievance committee will be relevant to the nature of the grievance. The grievance committee may include the EPC E&S manager, relevant subcontractor representatives, community leaders, business leaders as appropriate.

The composition of the grievance committee will also be cognisant of sensitivities related to gender or other (e.g. in the case of a GBVH grievance).

The grievance log will be reported monthly in the monthly construction progress report.

12 DOCUMENT AND RECORD MANAGEMENT (ACT – ELEMENT 10]

The Owner will maintain the following E&S documents and records on site:

- Copy of Employer's Policies, and specific action Plans and sub plans;
- Contractor CMPs (Contractor evaluation form (VIFOR_ESMS_Forms_F11),
- Permit matrix (VIFOR_ESMS_Forms_F02) and Conditions matrix (VIFOR_ESMS_Forms_F03)
- Stakeholder consultation log (template in SE plan)
- Community grievance log (Community grievance form (VIFOR_ESMS_Forms_F14, Community grievance log (VIFOR_ESMS_Forms_F15, External consultation Log (VIFOR_ESMS_Forms_F16)
- Worker grievance log
- Records for E&S audits and monitoring (inspection forms) Inspection and audit plan (VIFOR_ESMS_Forms_F04)
- Non-compliance records and Corrective actions (Corrective Action Plan (template) (VIFOR_ESMS_Forms_F09)
- Training records (Training matrix (VIFOR_ESMS_Forms_F05)
- Correspondence in relation to E&S matters / permits including internal and external communication; and
- Record of required KPIs and related statistics (Monthly E&S reporting operation (VIFOR_ESMS_Forms_F13)

The Contractor must implement a site procedure for document control and retain all records relating to this topic including, monitoring, auditing, and training records.

Up-to-date records must be maintained on site at all times and retained in accordance with the duration specific in the contract and / or as stipulated under National law.

A comprehensive photographic archive of the Project must be maintained prior to, and during the construction phase.

A complete and up to date E&S File of all relevant sources of information must be maintained by the Contractor. The information in the E&SHSESS file must be available to the Employer and Lenders at any time and handed over to the Employer upon completion of the construction works.

The E&S file must include as a minimum:

- Current version of the Employer's E&S CMP (including Policies and supporting sub-plans);
- Contractor's E&S CMP and all related polices, plans, procedures and method statements;
- Organogram and definition of roles and responsibilities;
- Latest version of the Project schedule;
- Site layout plans and constraints map;
- Any land related documentation;
- Labour compliance auditing records;
- Legislation Register – detailing all relevant regulations, international guidelines, and codes of practice;

- Hazard Identification and Risk Assessment;
- Health and Safety and Environmental and Social Risk Register's
- Training Matrix;
- OHS training records (e.g. induction training records, toolbox talk records);
- Community Grievance log;
- Worker's grievance log;
- Incident reports;
- Log of chance finds as per chance finds procedure;
- Corrective Action Plan;
- Records for inspections;
- Minutes of E&S meetings;
- Current calibration certificates for all the equipment that requires calibration by an external organization;
- Copies of all relevant Material Safety Data Sheets;
- Labour related information (sub-contractor contracts, training records, statistics relating to labour force breakdown and gender split)
- GBVH related records (confidentially);
- Site closure and rehabilitation work program; and
- Design plans for closing out the construction works.
- Stakeholder consultation log;
- Community grievance log;
- Records for E&S audits and monitoring (inspection forms);
- Non-compliance records and Corrective actions;
- Training records;
- Correspondence in relation to E&S matters / permits including internal and external communication; and
- Record of required KPIs and related statistics

The Contractor must implement a site procedure for document control and retain all records relating to this topic including, monitoring, auditing, and training records.

Up-to-date records must be maintained on site at all times and retained in accordance with the duration specific in the contract and / or as stipulated under National law.

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The E&S file must include as a minimum:

- Current version of the Employer's ESMP CMP (including Policies and supporting sub-plans);
- Contractor's E&S CMP and all related polices, plans, procedures and method statements;
- Organogram and definition of roles and responsibilities;
- Latest version of the Project schedule;
- Site layout plans and constraints map;
- Any land related documentation;
- Labour compliance auditing records;
- Legal Register – detailing all relevant regulations, international guidelines, and codes of practice;
- Hazard Identification and Risk Assessment;
- Health and Safety and Environmental and Social Risk Register's
- Training Matrix;
- OHS training records (e.g. induction training records, toolbox talk records);
- Community Grievance log;
- Worker's grievance log;
- Incident reports;
- Log of chance finds as per chance finds procedure;
- Corrective Action Plan;
- Records for inspections;
- Minutes of E&S meetings;
- Current calibration certificates for all the equipment that requires calibration by an external organization;
- Copies of all relevant Material Safety Data Sheets;
- Labour related information (sub-contractor contracts, training records, statistics relating to labour force breakdown and gender split)
- GBVH related records (confidentially);
- Site closure and rehabilitation work program; and
- Design plans for closing out the construction works.

13 E&S MONITORING, MANAGEMENT AND EVALUATION OF COMPLIANCE [CHECK - ELEMENT 11]

13.1 OBJECTIVES

As per IFC PS 1, para. 23. The client will establish procedures to monitor and measure the effectiveness of the management program, as well as compliance with any related legal and/or contractual obligations and regulatory requirements.…' furthermore, the client must act when that performance is not appropriate or needs enhancing, to ensure progress stays on track (monitoring and review).

13.2 GENERAL APPROACH

E&S Controls in place during the Project construction stage are based on an E&S compliance assurance (monitoring and reporting) process to ensure that E&S Project policies, regulations and standards are met.

Project Owner's management controls are focused on the following:

i. implementation of the Project's E&S Management System described in this ESMP,

ii. Implementation by the EPC Contractor of the Project Policies, Regulations and Standards,

iii. oversight of EPC Contractor's activities, and

iv. compliance assurance to verify that the works are performed according to the Project Policies, Regulations and Standards and in line with E&S management system.

This E&S compliance assurance process (including the full range of environmental, occupational health and safety, labour and working conditions, socio-economic, community safety and cultural heritage aspects) is implemented at two levels:

- First level: EPC Contractor's Self-Verification program (inspections, monitoring) to demonstrate compliance with E&S policies, regulations and standards, and to provide evidence that EPC meets their obligations. Includes oversight of subcontractors.
- Second level: Project Owner's Oversight and Assurance activities (inspections and audits).

Oversight is performed by the Project Owner's E&S staff to ensure that Project Owner's own and EPC Contractor's activities (including their E&S self-verification) are aligned with the Project standards and the provisions of this ESMP. This includes review of EPC E&S reports, documentation, monitoring data, procedures & plans, undertaking formal site inspections and attending meetings with EPC Contractors to drive performance and address issues.

Assurance activities are performed by personnel (or specialized service providers) not directly involved in the works being checked, to provide an additional layer of assurance beyond self-verification and oversight and measure the compliance of Project activities. Assurance process comprises targeted audits and formal reviews. Assurance activities are typically detailed and focused on defined risk areas or guided by feedback from the results of the self-verification and oversight activities.

In addition to the above, independent audits of compliance with Project Requirements, Regulations and Standards and including both Project Owner's and EPC Contractor's performance are performed periodically, typically on annual basis.

The controls put in place to manage, monitor, measure and report compliance with Project E&S policies, regulations and standards during the Project construction stage are outlined in this ESMP section.

The Project Owner and the EPC Contractor will track and monitor various performance indicators both leading and lagging so as to identify potential trends in environmental, safety and social performance, as defined in the ESMP sub plans. The EPC contractor is required to implement the monitoring requirements at the site level and to define this in their EPC-ESMS.

- KPI Monitoring Matrix [VIFOR_ESMS_Forms_F06]
- Monthly E&S reporting (construction) (VIFOR_ESMS_Forms_F07)

13.3 PROJECT OWNER'S E&S OVERSIGHT (MONITORING)

E&S oversight is aimed at monitoring construction activities to determine whether environmental, occupational health and safety, labour and working conditions, socio-economic, community safety and cultural heritage mitigation measures implemented by EPC Contractors are effective (i.e. whether these avoid, minimise the impacts as intended, or whether work practices require revision).

During construction stage, E&S oversight monitoring is coordinated by the Project Owners E&S Manager and performed through ongoing review and follow-up on EPC Contractor's weekly and monthly reports and on non-conformance/incident reporting, as well as through inspections of the construction worksites.

The E&S oversight inspections are performed regularly, on monthly basis, and are intended to highlight key EPC Contractor conformance aspects, and their outcome is used to determine the required actions. In addition to the regular monthly inspections, unscheduled inspections (spot-checks) of critical/key Project areas are performed as needed. The locations and timing of the unscheduled inspections are determined based on the ongoing Project activities and issues, as informed by the EPC Contractor's weekly/monthly reports and the non-conformance/incident reporting outcomes.

The E&S oversight is aimed at addressing all Project E&S aspects and worksites and ensuring that each of them are visited by the Project Owner's E&S management site weekly as a minimum or more often as needed in response to ongoing issues and E&S management needs.

Checklists may be used in support of the field inspections which may be organized based on specific E&S topics addressing key aspects associated with the construction works being inspected.

Inspections observations and findings are discussed with EPC E&S representatives to determine and agree on any actions required.

Project Owner's E&S oversight (monitoring) reports are generated as simple records to include:

- indication of the construction works/site inspected;
- indication of the construction activities inspected;
- observation notes providing description of positive aspects, good practice or issues/non-compliances identified;
- photographic evidence of the observations made/issues identified.

Where E&S oversight (monitoring) inspections identify issues or Non-conformances, the remedial actions required in response are discussed and agreed with the EPC Contractor and recorded into the EPC Contractor's ATS.

13.3.1 PROJECT OWNER'S SOLUTIONS E&S ASSURANCE AUDITS

Environmental, social, health and safety audits of the EPC Contractor are performed on monthly basis or upon attaining specific construction works delivery milestones by the EPC Contractor (e.g. 0 – 50%, 50-100% construction works execution).

Audits will be split as follows:

- Daily, weekly owner inspections
- Monthly H&S Audit
- Monthly E&S Audit
- Monthly Labour Audit

The Audits are conducted primarily by Project Owner's own staff independent of the activities audited, or by contracted third-party specialists to provide assurance of oversight and self-verification activities.

The EPC Contractors are formally notified about the E&S audits and their scope which include but may not be limited to:

- EPC Contractor E&S organization/staffing adequacy;
- EPC Contractor E&S documentation;
- Implementation by EPC Contractor of the ESMP and CMPs, method statements and specific E&S Procedures;
- E&S training and inductions;
- E&S Key Performance Indicators (KPIs);
- E&S Non-conformance and incident reporting, tracking and closure.

Audit protocols are developed based on the defined scope and used by auditors for guidance and for recording audit observations including good practice and non-conformances.

Audit outcomes are summarized in reports and formally communicated to and discussed with the EPC Contractor. Any required corrective actions are agreed with the EPC Contractor and recorded in their Corrective Action Plan (Corrective Action Plan (template) (VIFOR_ESMS_Forms_F09). Progress in addressing the audit findings is followed up on a regular basis to close the open and pending actions and reported monthly.

13.4 EPC CONTRACTOR SELF-VERIFICATION PROGRAM

EPC Contractor is required to operate an Environmental and Social Management System (ESMS) in alignment with the principles of ISO14001 and ISO 45001, which requires self-verification of compliance in accordance with the plan-do-check-review cycle (ESMS accreditation to ISO14001 and ISO 45001, although recommended, is not a requirement).

As part of its construction works planning, EPC Contractor is required to prepare and implement an EPC HSE Plan and topic-specific Contractor Management Plans which detail how the EPC Contractor complies with the specific Project E&S (including environmental, occupational health and safety, labour and working conditions, socio-economic, community safety and cultural heritage aspects) policies, regulations and standards through a self-verification program including:

- Performing E&S inspections and audits of own (EPC) and subcontractors' activities;
- Performing E&S monitoring;
- Implementation of a non-conformance and incident notification and response procedure;
- Implementation of an EPC Contractor E&S Action Tracking System.

13.4.1 EPC CONTRACTOR INSPECTIONS AND AUDITS

To provide assurance that the provisions of the topic-specific management plans/method statements are implemented effectively, EPC Contractors are required to implement a program of documented inspections and audits at the Project site and the associated facilities addressing own activities and those performed by subcontractors.

This includes undertaking walk-around inspections during construction works execution to visually monitor that mitigation measures are implemented, undertaking joint inspections with the Project Owner, and engagement with project-affected parties, stakeholders and regulators. These activities will also include, in addition to the E&S matters, inspection of subcontractors' workforce management aspects (including labour and working conditions and workers accommodation) against Project Requirements, Regulations and Standards with quarterly frequency.

EPC Contractor's internal audits will be performed in line the EPC Contractor`s management system (specific plan to be defined) as approved by the Project Owner. As a minimum E&S internal audits are to be performed by the EPC Contractor as defined in this ESMP. Focused audits or performance reviews addressing specific aspects as required in line with the Project stage are to be performed monthly. The audits are to be performed by an interdisciplinary team of appropriately qualified health and safety, environmental and social auditors. Project Owner's E&S staff may join the EPC audit team and participate in the EPC Contractor's internal audits.

13.4.2 EPC CONTRACTOR ACTION TRACKING, NON-CONFORMANCE AND INCIDENT RESPONSE AND NOTIFICATION SYSTEM

In response to any issues, observations, non-conformances and incidents, the EPC Contractor is to propose appropriate corrective actions and record these (including responsibilities and timescale for completion) in its own E&S (including environmental, occupational health and safety, labour and working conditions, socio-economic, community safety and cultural heritage aspects) Corrective Action Plan (CAP Corrective Action Plan (template) (VIFOR_ESMS_Forms_F09) . The CAP shall be implemented to ensure recording and follow-up of Non-conformances and incidents and their associated corrective actions.

Project Owner's E&S management staff will regularly review of the Project CAP typically on a weekly basis and will follow-up on progress to confirm closure of measures.

A two-tier non-conformances management process has been defined for the Vifor Wind Farm Project . Non-conformances identified as result of inspections, monitoring and audits performed are recorded by EPC Contractor as actions to be addressed in line with their own management systems and reported to Project Owner in the monthly reports as a minimum.

EPC Contractor is required to implement their own E&S Non-conformances and Incident Reporting and Investigation procedures. All E&S incidents and near misses will be notified to the Project Owner. Incidents will be notified immediately as they occur, while near misses will be reported on weekly basis.

The Project Owner reserves the right to carry out its own investigations of EPC accidents/incidents/near-misses/non-conformances or assist the EPC investigation teams.

Project Owner's E&S Manager will review the Non-conformances and incidents reports of the EPC Contractor. Project Owner's E&S Manager will regularly meet relevant EPC Contractor representatives to review the Action Tracking System and status of actions progress and closure.

13.4.3 EPC CONTRACTOR MONITORING

The procedures for monitoring implementation and outcomes of the E&S mitigation measures, E&S KPIs and environmental and social monitoring are defined by the EPC Contractor in their CMPs and method statements. The monitoring frequencies, parameters, methodology and duration are determined based upon the site activities requiring monitoring and are assessed on a case-by-case basis dependent upon construction activity type and location.

The EPC Contractor is responsible for reporting monitoring results to the Project Owner on a monthly basis as part of the monthly progress report to the Lender.

Monitoring requirements are summarised in the Project Monitoring Matrix (Monitoring matrix (VIFOR_ESMS_Forms_F06)

14 REPORTING - CHECK [ELEMENT 12]

14.1 OBJECTIVES

IFC PS1 states that the 'results of environmental and social monitoring should be evaluated and documented. Periodic reporting of progress and monitoring results should be made to the senior management of the client's organisation as a function of the client's management system'.

14.2 PROJECT OWNER'S REGULAR E&S OVERSIGHT REPORTING

The Owner will perform the following reporting:

- national compliance reporting as outlined in project environmental permit6
- Compliance reporting against international lender "applicable standards";
- Compliance reporting against ESMP and sub plans; and
- Periodic community reporting (as set out in the Project SEP).

An E&S oversight report is provided by the E&S Manager to the Project Management on monthly basis. The report summarizes the key issues and challenges during the reporting period as resulted from the E&S oversight inspections and the review of the EPC Contractors' E&S reports and ATS status.

Regular reporting is intended to keep the Project Management informed on E&S aspects, so that direction and feedback can be provided to EPC Contractors and leadership support obtained for addressing key and more strategic issues at appropriate decision levels as applicable.

Grievance7 reporting is a joint effort between the Employer and the Contractor. The Employers requirements for community and worker grievance reporting are set out in:

- SEP including community mechanism; and
- LM Sub-plan including workers grievance mechanism.

Reporting required to be treated as confidential, e.g. at the request of the complainant or in relation to Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA) and Sexual Harassment (together referred to as GBVH) should be confidential and treated sensitively and confidentially and in accordance with the owner GBVH requirements.

14.3 PROJECT CONTRACTOR REPORTING

The Contractor must report the following categories of information to the Employer:

- Reporting on permits under the control of the Contractor;
- Incident Reporting – including accident and incident reporting, flash reporting and root cause analysis (see section below);

6 Permits obtained by the Employer are the responsibility of the Employer for compliance reporting. Where the Contractor is responsible for obtaining the permit, the Contractor is also responsible for compliance reporting. Refer to CTT Permit Matrix F374 for further information.

7 May also be referred to as complaint. For this Project the term complaint and grievance may be used interchangeably noting that typically a complaint is the formal act of filing a grievance.

- Inspection and CAP reporting – summarising no. of inspections, outcomes of the inspection, no. of corrective actions open/closed and other actions required;
- Employment statistics, number contractors, subcontractors, and local labour (see Labour Management Sub-plan for the definition of 'local labour') see also F377B;
- Weekly E&S including the information set out in F377A; and
- Monthly E&S report including the information set out in F377C.

The Contractor must provide the Employer with templates for all the above reports prior to site mobilisation, to be reviewed and approved by the Construction Director.
The Contractor will integrate into their reporting to the Owner the following:

- Weekly E&S Report must provide as a minimum the information defined in Table 15 (template is provided in Form 377a;); and
- Monthly E&S Report must include an executive summary, summary of weekly statistics on incidents and general and Project topic-specific KPIs, appendices and detail regarding significant incidents and root cause analysis, and information on the proactive actions undertaken to enforce E&SHSESS at the site during the reporting period. The report will cover the main deviations and corrective actions identified during the period as well as actions still pending, and actions closed during the month. In addition, it must include the information outlined in Form 377C – monthly reporting.

The accident and incident reporting must present the data in such a manner as to show the evolution of the statistics over time and include the cause of the incident

14.4 EXTERNAL REPORTING

The Project Owner will prepare an annual report on environmental; health and safety performance and implementation of the stakeholder engagement plans and grievance procedure. The annual report will be disclosed on the Project website.

In addition, the Project Owner commits to following external reporting:

- Annual Monitoring Report (AMR) to the Lenders
- SFDR disclosure requirements as applicable (to be defined by Rezolv)
- Statutory Notifications and Reporting to national regulatory bodies as required in line with the applicable regulations and Project permits, and
- Incident Notification and Reporting to Owner, shareholders and Lender as defined in this ESMP.

According to the incident reporting procedure in place, medium and major incidents (fatalities included) are to be reported to authorities within 2 hours from occurrence. Any such incidents will be also reported to Vifor Wind Farm Project lenders within 4 hours.

All environmental and social incidents will be appropriately documented, notified and reported in accordance with established procedures as indicated in previous sections of this ESMP (section 8.4).

Incident notification and reporting to relevant national regulatory bodies will be performed in line with applicable regulations in force and as stipulated in permits and licenses.

14.5 INCIDENT AND NON-CONFORMANCES REPORTING, INVESTIGATION AND CORRECTIVE ACTIONS [CHECK]

Non-conformances and incidents are recorded, reported, investigated and addressed. Incident management and reporting is obligatory for Occupational Health and Safety serious accidents and fatalities. In the event of any of the following Incidents; fatality, LTA, medical treatment case, work

restriction case, first aid case, major environmental incident, major social incident, and security incidents, the Contractor must complete an Incident Report and notify the Owner Construction Director.

All non-conformances and incidents (including near misses) will be investigated to establish the immediate and underlying/root causes (plans must be established to deal with immediate risks following unforeseen events) and to identify actions to:

- Evaluate and correct the situation as quickly as possible;
- Assess and limit adverse E&S consequences of the incident;
- Prevent reoccurrence and improve E&S performance; and
- Ensure planned actions integrate with other E&S requirements, including contractor interfaces where appropriate;
- Improve future risk management;
- Ensure lessons are learned throughout the Project organization;
- Demonstrate commitment to effective E&S management.

Non-conformances are unapproved deviations from Project E&S Specifications or Standards or deviations from Project Owner's or EPC Contractor's Management Plans. These are typically identified through the oversight and assurance process (e.g. daily monitoring, oversight inspections and audits).

Non-conformities may be categorised as minor or major and are recorded and reported in a pre-defined format including description of source/cause, categorization (severity), description and evidences, responsible party and corrective actions.

Non-conformances are recorded in a register maintained by the EPC Contractor and acting as a tool for following up on non-conformances to closure.

Incidents are classified using a 3-level severity scale (i.e. Minor, Serious, Major). All incidents and accidents taking place on contractor's locations and/or facilities, while under contract with the Project Owner will be reported to the Project Owner's management by e-mail within 4 hours from incident occurrence. In addition, immediate telephone notification will be made for severity 2 and 3 incidents.

All incident investigations are conducted and documented to appropriate level of detail dependent upon the severity of the incident.

Actions identified as being required in the incident investigation report are recorded on Corrective Action Forms to prevent reoccurrence of similar incident. Action plans for the remedial measures implementation as identified in the investigation are defined and include information on responsibilities, resources required, completion dates and reporting requirements.

The status of corrective actions and associated action plans are tracked and once all the actions are completed, this is recorded in a Corrective Action Form signed off for closure. The status of corrective actions implementation and closure is tracked in the Project Incident Register.

Incident reports and key incident statistics are analysed for trends for each Project activity and reported on a monthly basis as part of the performance monitoring program. Relevant findings are communicated throughout the Project organization.

Arrangements for incident reporting and investigation system, as well as the effectiveness of corrective actions are periodically reviewed, as a minimum with annual frequency, as part of the management review process.

15 MANAGEMENT REVIEW [ACT – ELEMENT 13]

15.1 OBJECTIVES

Project ESMS documentation is considered 'live' and is required to be reviewed and updated in relation to changes in project circumstances, activities, environmental sensitivities and future requirements defined by respective regulatory authorities and Project Lender with an objective for continual improvement. Management Review is a key element of the ESMP Cycle (Figure 2), closing the adaptive management loop as part of the continual improvement process of the implemented management system.

15.2 REQUIREMENTS

Project Owner's ESHS Manager and EPC Contractor's HSE Manager must conduct management reviews including the following:

- Project Owner performance reviews.
- EPC Contractor's E&S functional and project cross-functional reviews.
- Project management meetings.
- Weekly and monthly E&S function meetings.

Project Owner's senior management periodically review the overall effectiveness of the E&S management system, annually as a minimum. The scope of the E&S Management Review include:

- Provide management with a summary of yearly E&S performance, including:
    - Non-conformances and corrective actions
    - Monitoring and measurement results
    - Audit results
    - Stakeholder feedback and concerns (as resulting from the stakeholder engagement process)
    - Adequacy of E&S resources
    - E&S performance
    - E&S incident trends, response, and reporting.
- Identify opportunities for and drive continual improvement.
- Summarize the significant E&S risks and envisaged risk management in the following period.

The annual E&S Management Review will inform the annual E&S planning and targets as well as any changes including resource needs.

Appendix A.1 Attachment 1: Relevant Laws and Regulations

NATIONAL LEGISLATION

General Legislation

- Law no. 50/1991 regarding the authorization of execution of construction works (Law no. 50/1991);
- Government Decision no. 839/2009 for the approval of the Methodological Norms of application of Law no. 50/1991;
- Law no. 350/2001 regarding territorial landscape and urban planning (Law no. 350/2001);
- Order no. 233/2016 for the approval of the Methodological Norms of application of Law no. 350/2001;
- Government Decision no. 525/1996 for the approval of the general urbanism regulation;

General Environmental Legislation

- Law on Environmental Protection no. 137/1995, amended several times;
- Law on Environmental Impact Assessment no. 92/2018
- Law on Ambient Air Quality 104/2011
- Law on Waters no. Law on Waters 107/1996
- Law on Nature Protection no. 49/2011 amending Law no. 57/2007
- Law on Waste no. 92/2021
- Law on Protection against Noise 121/2019

Biodiversity and Protected Areas

- Emergency Government Ordinance no. 57/2007 on the regime of protected natural areas, the preserve of natural habitats, wild flora and fauna – which transposes Directive 79/409/EEC on the conservation of wild birds, the Habitats Directive 92/43/EEC and Directive 2006/105/EC adapting Directives 73/239/EEC, 74/557/EEC and 2002/83/EC in the field of environment, by reason of the accession of Bulgaria and Romania;
- Government Decision no. 663/2016 setting up the protected natural areas and declaring special protection areas, as integral part of the European ecological network Natura 2000 in Romania;
- Government Decision no. 1284/2007 regarding the institution of bird protection areas as integral part of Natura 2000 European ecological network in Romania – which transposes the Habitats Directive 92/43/EEC;
- Order no. 46/2016 establishing protected natural areas and declaring the sites of community importance as an integral part of the European ecological network Natura 2000 in Romania;
- Order no. 1964/2007 on the institution of the protected natural area regime for sites of community importance as integral part of Natura 2000 European ecological network in Romania, which transposes the Birds Directive 2009/147/EC;
- Law no. 5/2000 re the approval of the Spatial Planning of the National Territory – Section III – protected areas.

Emissions and Air Quality

- Law no. 278/2013 on industrial emissions – which transposes the Industrial Emissions Directive 2010/75/EU;

- Emergency Government Ordinance no. 104/2001 on ambient air quality – which transposes the Ambient Air Quality Directive 2008/50/EC and Directive 2004/107/EC relating to arsenic, cadmium, mercury, nickel and polycyclic aromatic hydrocarbons in ambient air;
- Government Decision no. 780/2006 establishing a scheme for greenhouse gas emission allowance trading – which transposes Directive 2003/87/EC establishing a scheme for greenhouse gas emission allowance trading within the Community and amending Council Directive 96/61/EC;

Water

- Water Law no. 107/1996 – transposing Directive 2000/60/EC establishing a framework for Community action in the field of water policy and Directive 2007/60/EC on the assessment and management of flood risks;
- Law no. 458/2002 on the drinking water quality – which transposes Articles 9 and 15 of the Drinking Water Directive 98/83/EC;
- Order no. 662/2006 approving the Procedure and competencies for the issuance of water management permits and authorizations;
- Order no. 1406/2003 approving the Methodology for the quick assessment of environmental and human health hazards;
- Order no. 15/2006 re the approval of the Procedure for the temporary suspension of the water management authorizations and of the Procedure for amending and withdrawal of water management permits and authorizations.

Soil / Contaminated Land

- Government Decision no. 1408/2007 on the methods of investigation and assessment of soil and subsoil pollution;
- Government Decision no. 1403/2007 on the rehabilitation of the areas where the soil, subsoil and ecosystems were affected;

Noise (Airborne)

- Government Decision no. 321/2005 in relation to the assessment and management of environmental noise – which transposes Environmental Noise Directive 2002/49/EC;

Wastes and Chemical Substances

- Law no. 249/2015 relating to packaging and packaging waste – which transposes Packaging and Packaging Waste Directive 94/62/EC;
- Law no. 211/2011 on waste regime – which transposes the Waste Framework Directive 2008/98/EC;
- Law no. 360/2003 in relation to waste and hazardous materials management;
- Emergency Government Ordinance no. 196/2005 on the Environmental Fund;
- Government Decision no. 570 / 2016 regarding the approval of the Program for controlled elimination of evacuations, emissions and losses of priority dangerous substances and other measures concerning the main pollutants – which transposes Directive 2008/105/CE, Directive 2009/90/CE and Directive 2013/39/UE;
- Government Decision no. 477/2009 establishing the applicable sanctions for failure to comply with the provisions of Regulation no. 1907/2006/EC concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals, establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and

Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC;

- Government Decision no. 1061/2008 on the transport of hazardous and non-hazardous waste on the Romanian territory;
- Government Decision no. 235/2007 regarding management of waste oils;
- Government Decision no. 856/2002 on waste management evidence and approving the waste list, including hazardous waste;
- Order no. 1084/2003 approving the Notification procedures for activities posing major accident hazards involving dangerous substances and the respective major accidents;
- Order no. 757/2004 approving the Technical norms on waste storage;

National Legislation on Social Aspects

- Land Law no. 18/1991;
- Law on Cadastre no. 105/2019
- Law on Property and other al Rights no. 185/2018
- Law no. 247/2005 on property and justice reform and some accompanying measures, with special references on Legal circulation of land; amended by Decision 597/2020 on the exception of unconstitutionality conditioning the right to compensation of the holders of compensation titles, for his selection of a certain mode of compensation;
- Government Emergency Ordinance 34/2013 on the organization, management and operation of permanent grassland, and amending and supplementing Law 18/1991 on Land Reclamation.
- Law on Road Traffic Safety no. 195/2002
- Government Ordinance no. 43/1997 on roads regime;
- Law on Labour no. 53/2003
- Government Decision no. 600/2007 regarding protection of young employees against economic exploitation, transposing Directive 92/33/CE concerning protection of young employees at workplace;

Cultural Heritage

- Law on Cultural Heritage no. 422/2001 and subsequent amendments no. 26/2008 and no. 451/2002
- Law no. 182/2000 on the protection of the national cultural movable heritage;
- Government Ordinance no. 43/2000 on the protection of the national cultural heritage and the declaration of some archaeological sites as of national interest;
- Government Ordinance no. 68/1994 on the protection of national cultural heritage;
- Order no. 2361/2010 approving the List of Historical Monuments 2010;
- Order no. 2562/2010 approving the Procedure for granting archaeological research authorizations;
- Order no. 2260/2008 approving the Methodological norms for classification and evidence of historical monuments;
- Order no. 2518/2007 approving the Methodology for enforcement of the archaeological discharge procedure;

- Order no. 2392/2004 regarding the Standards and procedures in archaeology;
- Order no. 2682/2003 approving the Methodological guidelines regarding the classification and recording of the historical monuments, the List of Historical Monuments, the Analytical record card for historical monuments and the Minimal record card for recording historical monuments;
- Ordinance no. 43/2000 on the protection of the archaeological heritage and declaring certain archaeological sites as national interest areas Ministry of Culture;
- Decision no. 2314/2004 re the approval of the list of historical monuments and missing monuments;

Health and Safety

- Law no. 64/2008 on the safe operation of pressure vessels, lifting equipment and fuel-consuming devices;
- Law no. 319/2006 on safety and health at work, which transposes Directive 89/391/EEC on the introduction of measures to encourage improvements in the safety and health of workers at work;
- Government Decision no. 1425/2006 for approving the Methodological Norms for application of Law no. 319/2006;
- Law no. 307/2006 on fire safety;
- The Labour Code, approved by Law no. 53/2003;
- Government Decision no. 571/2016 approving the categories of buildings and facilities which are subject to endorsement and/or authorization for fire safety;
- Government Decision no. 971/2006 on the minimum requirements for the provision of safety and/or health signs at work - which transposes Directive 92/58/ EEC on the minimum requirements for the provision of safety and/or health signs at work;
- Government Decision no. 1091/2006 on the minimum safety and health requirements for the workplace - which transposes Directive 1989/654/EEC Directive 1989/654 concerning the minimum safety and health requirements for the workplace;
- Government Decision no. 1146/2006 on the minimum safety and health requirements for using work equipment, transposing Directive 1989/655/CEE on the minimum requirements for using work equipment by workers;
- Order no. 163/2007 approving the General fire safety norms;
- Government Decision no. 493/2006 on the minimum requirements for protection of safety and health protection of workers against hazards arisen from exposure to noise, transposing Directive 2003/10/CE concerning the minimum safety and health requirements for protection of workers exposed to noise;
- Government Decision no. 1048/2006 on the minimum requirements for personal protective equipment worn by workers, transposing Directive 89/656/CEE concerning the minimum safety and health requirements for using PPE by workers in the workplace;
- Government Decision no. 1051/2006 on the minimum requirements for health & safety of workers involved in manual handling of loads, transposing Directive 90/269/CEE concerning minimum safety and health requirements for manual handling of loads;
- Government Decision no. 1218/2006 on the minimum requirements for health & safety protection of employees exposed to hazards arisen from chemical agents, transposing Directive 98/24/CE concerning protection of health and safety of workers exposed to chemical agents in the workplace;

- Government Decision no. 355/2007 regarding workers health surveillance;
- Order no.427/2002 regarding minimal First Aid Kit inventory for workplaces without specialized medical assistance;
- Order no. 3/2007 regarding approval of template for Reporting of Lost-time Incidents;
- Order no. 242/2007 regarding nomination of H&S Coordinator during execution stage of projects using construction sites;
- Order no. 867/2007 regarding approval of Romanian standards list harmonized with European standards referring to pressurized equipment;
- Government Decision no. 557/2007 on the minimum requirements for health & safety protection of special types of employees (fixed term contract employees/ temporary employees hired via crewing agencies);
- Government Decision no. 300/2006 on the minimum health & safety requirements for temporary construction sites, transposed Directive 92/57/CEE concerning minimum health & safety requirements applicable to temporary or mobile construction sites;
- Government Emergency Decision no. 99/2000 regarding applicable control measures for health & safety protection of workers during periods of extreme weather conditions;
- Government Emergency Decision no. 96/2003 regarding protection of new and expectant mothers in the workplace, transposing Directive 92/85/CEE concerning protection of new or expectant mothers on the workplace;
- Government Decision no. 1876/2005 on the minimum health & safety protection of employees exposed to vibration, transposing Directive 2002/44/CE concerning minimum health and safety requirements applicable for workers exposed to risks generated by vibrations;
- Government Decision no. 115/2004 on establishing of essential PPE safety requirements and conditions for admittance on national market;

APPLICABLE INTERNATIONAL LEGISLATION AND PROTOCOLS

International Environmental and Social Policies and Standards

- Applicable EBRD Performance Requirements (PR)*, 2019, set out in the EBRD's Environmental and Social Policy:
    - PR 1: Assessment and Management of Environmental and Social Risks and Impacts;
    - PR 2: Labour and Working Conditions;
    - PR 3: Resource Efficiency and Pollution Prevention and Control;
    - PR 4: Health and Safety;
    - PR 5: Land Acquisition, Involuntary Resettlement and Economic Displacement;
    - PR 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources;
    - PR 8: Cultural Heritage; and
    - PR 10: Information Disclosure and Stakeholder Engagement.

    *PR7 refers to requirements linked to Indigenous Peoples, which are not present in Romania, thus is not applicable to the Project.

    *PR 9 refers to standards to be considered by financial intermediaries, thus is not applicable to the Project.

- Equator Principles IV (2020);
- International Financing Corporation (IFC), Performance Standards (PS) (2012);
- IFC Environmental, Health and Safety Guidelines for Wind Energy (2015);
- IFC Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution (2007);
- World Bank Group, General Environmental, Health, and Safety Guidelines (2007);
- World Bank Group, Environmental, Health and Safety Guidelines for Wind Energy (2015);
- IFC/EBRD Guidance Note: Worker's Accommodation: Processes and Standards (2009);
- Voluntary Principles on Security and Human Rights.

International conventions and protocols

- The Kyoto Protocol on Climate Change (UNFCC)

  Romania became a signatory to the UNFCC in 1998 with a full ascension in 2002. This obligates Romania to assure that the future development in the country meets the conditions of the Convention.

  Relevant to the present Project are the requirements associated with the potential generation of greenhouse gas. Further conditions of relevance include:

  - Enhancement of energy efficiency in relevant sectors;
  - Protection and enhancement of sinks and reservoirs of greenhouse gases;
  - Promotion of sustainable forest management practices, afforestation and reforestation;
  - Promotion of sustainable forms of agriculture;
  - Implementation of measures to limit and/or reduce emissions of greenhouse gases; and
  - Limitation and/or reduction in methane emissions.

- The United Nations Convention on Biodiversity 1992

  This Convention seeks to conserve biodiversity and promote its sustainable use. It requires the identification and monitoring of the biodiversity in an area and adopting the necessary conservation measure. Romania become party to this Convention in 1994.

- The Basel Convention 1989

  This was developed under the auspices of the United Nations Environmental Programme (UNEP) in response to the growing worldwide awareness of the problem of international traffic in hazardous waste.

  The Basel Convention 1998 is the first and foremost global environmental treaty that strictly regulates the trans-boundary movement of hazardous wastes. It obligates parties to ensure environmentally sound management, especially during the disposal process.

  The objectives of the Convention are to:

  - Ensure that waste is disposed of as near as possible to the place or source of its generation;
  - Reduce trans-boundary waste and where it cannot be avoided, to be disposed of in an environmentally sound and efficient manner; and

  - Provide assistance to developing countries in the management of hazardous waste and the generation.

- International Union for Conservation of Natural Resources Red List of Threatened Species

  The IUCN Red List, in 1994, was founded in order to provide a comprehensive inventory of the global conservation status of biological species, and to set of precise criteria to evaluate the extinction risk of thousands of species and subspecies. These criteria are applicable to all species and all regions of the world.

- Convention on the Conservation of European Wildlife and Natural Habitats, 1979, ratified by Law no. 13/1993 (Bern Convention);
- Convention on Conservation of Migratory Species of Wild Animals, 1979, ratified by Law no. 13/1998 (Bonn Convention);
- United Nations Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters 1998, ratified by Law no. 86/2000 (Aarhus Convention);
- European Convention on the Protection of the Archaeological Heritage, 1992, ratified by Law no. 150/1997 (La Valetta Convention);
- European Landscape Convention, 2000, ratified by Law no. 451/2002 (Florence Convention);
- The International Labour Organisation’s Core Conventions;

Appendix A.2 Attachment 2: Commitments Register

Ref.	Phase	Commitment	Topics	Responsibility	Source Document	Management Plan Reference	Project Worksite
0	1	2	3	4	5	6	8
1	Construction	EPC will implement mitigation measures to control nuisance dust and particulate emmissions, as follows: ■Enforce a speed limit of 30 km/h on unpaved surfaces, especially the access road to the site, and the national speed limits on public roads should not be exceeded; ■Maintain all construction vehicles regularly to minimise exhaust emissions; ■When not in use, vehicles will be switched off, unless impractical for health and safety reasons (for example, maintenance of air conditioning); ■Exercise traffic planning and control: avoid driving through settlements and close to residential areas, travel planning to minimise congestions, etc. ■Perform proper fleet management: use modern vehicles meeting up to date emission limits, routine maintenance, use of low sulphur fuels.	Air Emissions Construction Traffic	EPC	ESIA 2023	Pollution Prevention & Control Plan	Site Construction Laydown Area Temporary Access Roads
2	Construction	Mitigations to addres construction dust ■Restrict the area for the removal of vegetation and soil cover to that only necessary for the Project; ■Land clearance should be sequential and where ground and earthworks are undertaken the smallest possible area for working will be exposed; ■Stripping of topsoil will not be conducted earlier than required (maintain vegetation cover for as long as possible) in order to prevent the erosion (wind and water) of organic matter, clay and silt. ■Access road is to be wetted, especially during the dry season, and when construction activities are in progress, and especially in those areas in close proximity to residential homesteads (< 200 m). ■All transported bulk materials must be covered with tarpaulins to prevent fugitive dust emissions; ■Stockpiles stored longer than six weeks should be vegetated to reduce soil loss from wind or storm water runoff; ■Stockpiles will be located as far away from receptors as possible.	Air Emissions Construction Dust	EPC	ESIA 2023	Pollution Prevention & Control Plan	Site Construction Laydown Area Temporary Access Roads
3	Construction	Mitigations to address Soil compaction and erosion ■Sites/vegetation clearance, sites preparation, excavations, and improvement of existing roads and construction of additional access roads should not be carried out during periods of torrential rains or storms and heavy wind, to minimize compaction and erosion; ■Rehabilitation interventions in the priority areas (i.e. areas where there is a low likelihood of natural revegetation or where areas are prone to compaction and erosion from surface runoff) should be prioritised; ■Should compaction and erosion events be identified, appropriate remedial actions, including restoration of the compacted and/or eroded areas, and where necessary, the relocation of the paths causing the compaction and/or erosion, should be undertaken, ■Land/vegetation clearance should only be undertaken immediately prior to construction activities taken place there, ■Unnecessary land/vegetation clearance should be avoided, ■The footprints for all construction sites and areas for associated facilities/infrastructure (e.g. borrow and disposal areas, lay-down areas, construction/management sites and temporary offices) should be restricted to minimum feasible extent with measures implemented to avoid footprint creep, ■Unless foreign material, such as aggregate (e.g. crushed stone, ballast, gravel, sand), needs to be inserted, after the installation of features requiring the excavation of a deep holes, soil should be replaced in the holes so as to mimic the pre-construction profile.	Geology and Soil	EPC	ESIA 2023	Topsoil Management and Site Reinstatement Plan	Site Construction Laydown Area Temporary Access Roads
4	Construction	Mitigations to addresss Soil contamination ■Contract a licensed contractor to collect, transport and treat domestic, construction and hazardous wastes from Project sites, ■Prohibit dumping any types of solid waste to the soil, or burning waste of sites, ■Ensure that hazardous materials are stored in designated areas that are designed with impermeable floor, inflammable walls and accessible to authorized personnel, ■Hazardous waste shall be properly managed in accordance with existing legislation on hazardous waste ■Maintenance works are restricted to specially designated platforms with strict control of accidental spills, ■Procedures for responding to emergencies / accidental spills of hazardous materials, fuel and handling, and waste management are developed and implemented, ■In case of accidental/unintended spillage, the contaminated soil should be immediately collected and stored as hazardous waste.	Geology and Soil	EPC	ESIA 2023	Pollution Prevention & Control Plan; Waste Management Plan	Site Construction Laydown Area Temporary Access Roads

5	Construction	Mitigation measures to address Impact on Water Quality (groundwater and surface water resources) ■Install sediment traps and culverts as part of the drainage infrastructure around the Project sites prior to clearance and earthorks, so as to prevent any sediment run-off into the surrounding area. ■Provide culverts along new access roads to facilitate drainage along with ditches. Where practical, exposed surfaces and friable materials should be covered. ■Provide sufficient toilets at active work areas for staff and workers and these should be serviced regularly by a competent and suitably qualified person. ■Contractors and applicable Project staff should be trained regarding proper methods for transporting, transferring and hazardous substances that have the potential to impact water resources. ■Areas where spillage of contaminants occurs should be excavated (to the depth of contamination) and suitably rehabilitated. If any other minor spillage occurs, it should be cleaned immediately, and the contaminated area should be rehabilitated. ■The washing of Project vehicles in any surface water bodies in and around Project site(s) will be strictly prohibited. All Project vehicles should be washed at designated washbays on site/s. These wash bays will include oil/grease and sediment traps for grey water. ■Prevent any ad-hoc maintenance of vehicles/equipment in and around the Project site(s). All vehicles/equipment should be maintained at a designated workshop. The workshop will include an oil/grease trap. ■Maintain sll active work areas in a good and tidy condition; debris and waste should be contained in such a way that they cannot become entrained into surface run during periods of heavy rain. ■The management of sewage should be taken over by a licenced contractor . ■Provide hazardous waste storage areas with secondary containment. Moreover, hazardous waste should be stored in sealed/covered containers to prevent rainwater intrusion. ■Provide all dangerous and hazardous material stores and handling areas with secondary containment capable of holding 110% of the total capacity of all tanks/vessels. ■Confine the loading and unloading of dangerous and hazardous material to areas that are provided with secondary containment and in line with hazardous material handling procedures.	Groundwater and Surface Water	EPC	ESIA 2023	Pollution Prevention & Control Plan	All Project Worksites
6	Construction	Mitigation measures to address Impact on Water Quantity/Water Abstraction ■Before groundwater is selected as a source of water for the Project, a thorough assessment should be conducted on water availability and vulnerability in and around Project site(s). These studies should be undertaken by a suitably qualified specialist and should ensure that the design of the Project water supply scheme is such that it minimises and avoids abstraction rates beyond the safe yield volume and subsequent impacts to sensitive social receptors. ■Abstraction from surface water should be avoided. ■Operation and management of water abstraction should be undertaken in such a way that the rate of abstraction is monitored against safe yield abstraction rates.	Groundwater and Surface Water	EPC	ESIA 2023	Pollution Prevention & Control Plan	All Project Worksites
7	Construction	■Develop and implement a Grievance procedure in the event of any water reduction and subsequent water availability complaints being received.	Groundwater and Surface Water	Project Owner	ESIA 2023	Stakeholder Engagement Plan	All Project Worksites
8	Construction	■Segregate and identify domestic solid waste from the other waste streams into separate waste containers/skips clearly to facilitate recycling and reuse. ■Clearly label waste containers/skips and place them in designated waste storage locations. Labels will be waterproof, securely attached, and written in Romanian. ■Place an adequate number of covered bins for litter (food waste, domestic waste) throughout the sites at locations where staff consume food. These will be regularly collected and taken to the waste storage area/landfill. ■Store food waste within a sealed metal or plastic skip or bin, in order to prevent pests gaining access. ■Contain heavy waste within an open skip, provided that segregation occurs effectively enough to remove all lightweight material that could be blown away. ■Recycle and reuse waste generated during construction until reduced to as low as practicable, prior to collection for disposal by an appropriately licenced waste contractor. ■Engage only waste transporters and waste management facilities. ■Develop and maintain a waste inventory to document and track domestic solid waste generated, segregated, reused and consignments. ■Completed waste record reports are required to show the chain of custody of the waste generated on site, its transportation and treatment/disposal. All records will be maintained on site. ■Mandatory training program for employees to increase their awareness of waste management protocols including proper handling and storage of waste, recycling waste, reusing plastics, wood & other reusable non-hazardous materials. ■Identify recycling companies in Buzau County or in the the region in order to implement the recycling of waste. ■Develop and maintain a hazardous waste inventory to document and track hazardous wastes generated, segregated, reused and consignments. ■Segregate and identify hazardous waste from the other waste streams into separate signed and labeled waste containers/skips. ■Store hazardous waste in allocated hard standing areas in sealed containers stored with impermeable bases, sufficient containment and separation capacity, sun/rain shelter, separate drainage system, good ventilation and equipped with spill kits & spill response procedures. This area must be placed away from any sources of ignition. ■Hazardous waste storage area will be constructed away from drainage system and a rain shelter will be provided to avoid any potential instance of runoff, or leakage of runoff. ■Waste containers will be clearly marked with appropriate warning labels to accurately describe their contents and safety precautions. Labels will be waterproof, securely attached, and written in Romanian. Wherever possible, chemicals will be kept in their original container. ■Hazardous waste storage areas will be located away from any ignition sources or fire hazards. ■Develop and maintain a hazardous waste inventory to document and track sanitary waste generated and segregated. ■Sanitary wastewater tanks to be properly maintained and inspected to ensure tanks do not overflow. ■Site inspections will be carried out regularly by the EPC Contractor to ensure that all wastewater generated is properly managed, and no leakages or spill occur. In the event of a spill or overflow, immediate action will be taken in accordance with spill containment procedures and clean up procedures. ■Engage a licensed waste/wastewater contractor for the periodic removal of septic tanks.	Waste and Wastewater	EPC	ESIA 2023	Waste Management Plan	All Project Worksites
9	Construction	■In-situ testing of soil to ensure it is not contaminated and can be reused or disposed into land. ■Training –Contractor staff to be able to identify signs of potential contamination (smell of HC, staining).	Waste and Wastewater	EPC	ESIA 2023	Waste Management Plan	All Project Worksites
10	Construction	■Undertake _concrete washout in designated and signed areas to prevent leaks or spread of wastewater. ■Construct the concrete washout area and maintaine it in sufficient quantity and size to contain all liquid and concrete waste generated by washout operations. ■The concrete washout area will have an impermeable surface with dedicated drainage systems. ■Undertake the removal of any sludge residues as solid hazardous waste only by a licensed waste/wastewater contractor and handle as a hazardous waste.	Waste and Wastewater	EPC	ESIA 2023	Waste Management Plan	All Project Worksites

11	Construction	■ Store any generated medical waste in appropriate medical waste containers. ■ Handle all medical waste only by trained personnel. ■ Conduct the removal of any medical waste from the site for appropriate treatment, disposal/incineration will only by a licensed contractor.	Waste and Wastewater	EPC	ESIA 2023	Waste Management Plan	All Project Worksites
12	Construction	■ Demarcate the construction zone or servitude for the TL corridor on a map and on the ground clearly using high visibility tape for instance, to avoid impacting on sensitive areas outside of the permitted construction area;	Designated and Protected Areas	EPC	ESIA 2023	Biodiversity Management Plan	All Project Worksites
13	Construction	■ Reinstate temporary land take to original use after completion of construction	Designated and Protected Areas	EPC/Owner	ESIA 2023	Topsoil Management and Site Reinstatement Plan	All Project Worksites
14	Construction	■ Avoid locating construction camps and material/equipment laydown areas within or near identified natural or semi-natural habitat;	Designated and Protected Areas	EPC	ESIA 2023	Biodiversity Management Plan	All Project Worksites
15	Construction	■ Utilise existing roads wherever possible.	Designated and Protected Areas	EPC	ESIA 2023	Traffic Management Plan	Site Construction Laydown Area Temporary Access Roads
16	Construction	■ Implement relevant construction standards (e.g. 'Construction Code of Practice for the Sustainable Use of Soils on Construction Sites' – DEFRA, 20096F6F). Demarcate the construction zone or servitude for the TL corridor on a map and on the ground clearly using high visibility tape for instance, to avoid impacting on sensitive areas outside of the permitted construction area;	Habitats Habitat Loss / Degradation / Fragmentation	EPC	ESIA 2023	Topsoil Management and Site Reinstatement Plan	All Project Worksites
17	Construction	■ Avoid locating construction camps and material/equipment laydown areas within or near identified natural or semi-natural habitat;	Habitats Habitat Loss / Degradation / Fragmentation	EPC	ESIA 2023	Biodiversity Management Plan	All Project Worksites
18	Construction	■ Compile a suitable post-construction habitat restoration plan for temporary areas used during construction;	Habitats Habitat Loss / Degradation / Fragmentation	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
19	Construction	■ Use existing access roads or upgrade existing roads wherever possible before considered new access road construction;	Habitats Habitat Loss / Degradation / Fragmentation	EPC/Owner	ESIA 2023	Traffic Management Plan	Site Construction Laydown Area Temporary Access Roads
20	Construction	■ Place appropriate limits on the number of vehicle movements to and from the wind farm;	Habitats Habitat Loss / Degradation / Fragmentation	Owner	ESIA 2023	Traffic Management Plan	Site Construction Laydown Area Temporary Access Roads
21	Construction	■ Restrict vehicles to the use of only authorized access roads;	Habitats Habitat Loss / Degradation / Fragmentation	EPC/Owner	ESIA 2023	Traffic Management Plan	Site Construction Laydown Area Temporary Access Roads
22	Construction	■ Compile a suitable Invasive Alien Plant (IAP) species control plan and programme to manage IAP's within the control of the development;	Habitats Introduction/Spread of Invasive Species	Owner	ESIA 2023	Invasive Species Management Plan	All Project Worksites
23	Construction	■ Implement IAP species surveillance and control plan within areas in the projects control, focusing particularly on areas of natural habitat;	Habitats Introduction/Spread of Invasive Species	Owner	ESIA 2023	Invasive Species Management Plan	All Project Worksites
24	Construction	■ Monitor IAPs to inform further management intervention.	Habitats Introduction/Spread of Invasive Species	Owner	ESIA 2023	Invasive Species Management Plan	All Project Worksites
25	Construction	■ Implement buffer zones or exclusion areas around important nesting or foraging sites to minimize disturbance;	Birds Habitat Loss / Degradation / Fragmentation	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites

26	Construction	■Avoid site clearance during the breeding season. Where not, use Ecological Clerks of Works to identify nests and avoid till young have fledged.	Birds Habitat Loss / Degradation / Fragmentation	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
27	Construction	■Implement construction practices that minimize noise and vibration disturbance, such as scheduling activities outside sensitive bird breeding periods or using noise barriers;	Birds Noise and Vibration Disturbance	EPC/Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
28	Construction	■Avoid site clearance during the breeding season. Where not, use Ecological Clerks of Works to identify nests and avoid till young have fledged;	Birds Noise and Vibration Disturbance	EPC/Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
29	Construction	■Avoid site clearance during the breeding season. Where not, use "Ecological Clerk of Works" (ECoW) which will prepare the environmental documentation on delivery of ecological requirements on site before construction activities commence in order for contractors to meet key development milestones; The ECoW will monitor that site based construction activities are delivered in accordance to relevant laws and Project commitments;	Birds Direct Mortality	EPC/Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
30	Construction	■Install fence and mark work areas to minimise effects of vegetation clearance on birds.	Birds Direct Mortality	EPC/Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
31	Construction	■Install overhead transmission line and pylons ■Conduct thorough surveys to identify and protect nesting sites before construction begins. Implement buffer zones around active nests and restrict construction activities within these areas during breeding season;	Birds Installation of overhead transmission line and pylons	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
32	Construction	■Install overhead transmission line and pylons ■Fit suitable bird diverters at 5m intervals	Birds Installation of overhead transmission line and pylons	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
33	Construction	■Install overhead transmission line and pylons ■Install insulation, covers, and other avian protection devices on electrical equipment to prevent perching and contact. Regularly inspect and maintain the electrical infrastructure to ensure its effectiveness in mitigating electrocution risks.	Birds Installation of overhead transmission line and pylons	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
34	Pre-construction	■Conduct pre-construction checks for presence of bat roosts near construction sites;	Bats Habitat Loss / Degradation / Fragmentation	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
35	Construction	■Implement noise reduction measures to minimize noise-related disturbance near bat roosts;	Bats Habitat Loss / Degradation / Fragmentation	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
36	Construction	■Control of lighting to prevent light spill outside of construction areas through use of directional cowls.	Bats Habitat Loss / Degradation / Fragmentation	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
37	Construction	■Establishing buffer zones around bat roosts;	Bats Direct mortality	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
38	Construction	■Adjust construction schedules to avoid sensitive periods;	Bats Direct mortality	EPC/Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
39	Construction	■Implement proper lighting protocols to minimize disturbance.	Bats Direct mortality	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
40	Pre-construction	■Conduct pre-construction surveys where *Spermophilus citellus* habitats were identified within 100m of turbines during the baseline studies;	Mammals Spermophilus citellus Habitat Loss / Degradation / Fragmentation. Direct loss of species	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
41	Construction	■Establish temporary exclusion zones around sensitive *Spermophilus citellus* habitats to prevent destruction of burrows. Create buffer areas around key habitat zones to reduce noise levels, limit human activity;	Mammals Spermophilus citellus Habitat Loss / Degradation / Fragmentation. Direct loss of species	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites

42	Construction	■ Implement strict construction protocols to minimize disturbance to the species, including complying to specified working hours to minimize noise, implementing dust control measures to maintain air quality and utilize appropriate barriers to prevent unintentional access to construction areas;	Mammals Spermophilus citellus Habitat Loss / Degradation / Fragmentation. Direct loss of species	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
43	Construction	■ Implement a robust monitoring program during the construction phase to assess the impact on Spermophilus citellus and their habitat. This includes regular surveys, population monitoring and tracking of individuals. If unexpected impacts are observed, use adaptive management strategies to modify construction practices and mitigate any negative effects on the population;	Mammals Spermophilus citellus Habitat Loss / Degradation / Fragmentation. Direct loss of species	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
44	Construction	■ Establish exclusion zones or limiting construction activities in close proximity to active burrows;	Mammals Spermophilus citellus Noise and vibrance	Owner	ESIA 2023	Pollution Prevention and Control Plan	All Project Worksites
45	Construction	■ Use noise barriers and muffers on construction equipment;	Mammals Spermophilus citellus Noise and vibrance	Owner	ESIA 2023	Pollution Prevention and Control Plan	All Project Worksites
46	Construction	■ Undertake pre-construction surveys for otters 200m up and downstream of waterway crossings to identify any breeding or resting areas;	Mammals Lutra lutra Habitat Loss / Degradation / Fragmentation	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
47	Construction	■ Implement measures to avoid disturbance of holts or resting places such as set back distances or timing of works;	Mammals Lutra lutra Habitat Loss / Degradation / Fragmentation	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
48	Construction	■ Designate and protect riparian buffer zones along Călmățui riverbanks while consolidating the crossing over it. These zones will act as a protective buffer, maintaining the integrity of the otter`s habitat and minimizing the risk of disturbance;	Mammals Lutra lutra Habitat Loss / Degradation / Fragmentation	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
49	Construction	■ Implement best practice for river crossings to prevent deterioration of water quality (e.g. Scottish Environmental Protection Agency (2010). Engineering in the water environment: good practice guide River Crossings);	Mammals Lutra lutra Habitat Loss / Degradation / Fragmentation	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
50	Construction	■ Implement strict noise and disturbance control measures during the construction phase of the wind farm. This includes limiting construction activities during sensitive periods.	Mammals Lutra lutra Habitat Loss / Degradation / Fragmentation	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
51	Construction	■ Monitor water quality parameters regularly to identify any potential impacts and take corrective actions if necessary	Mammals Lutra lutra Water Quality	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
52	Construction	■ Establish exclusion zones or limiting construction activities in close proximity to active otter dens or habitats;	Mammals Lutra lutra Noise and Vibration	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
53	Construction	■ Use noise barriers and muffers on construction equipment; ■ Monitor noise and vibration levels regularly to ensure compliance with regulatory standards;	Mammals Lutra lutra Noise and Vibration	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
54	Construction	■ Schedule noisy activities during periods of low otter activity or avoid sensitive breeding season.	Mammals Lutra lutra Noise and Vibration	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
55	Construction	■ Conduct thorough surveys and assessments to identify the presence of herpetofauna species and their habitats before construction activities;	Herpetofauna Habitat Loss/ Degradation / Fragmentation	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
56	Construction	■ Implement best management for river crossings (SEPA 2010).	Herpetofauna Habitat Loss/ Degradation / Fragmentation	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites

57	Construction	■Establish buffer zones and construction exclusion zones around sensitive herpetofauna habitats to minimize disturbance;	Herpetofauna Noise and Vibration Disturbance	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
58	Construction	■Implement noise and vibration mitigation measures such as limiting noisy activities during sensitive periods (e.g., breeding season) and use equipment with noise reduction technologies.	Herpetofauna Noise and Vibration Disturbance	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
59	Construction	■Implement pollution control practice including appropriate storage and containement, refuelling stations away from water bodies, availability and training in use of spill kits;	Herpetofauna Water pollution		ESIA 2023	Pollution Prevention and Control Plan	All Project Worksites
60	Construction	■Conduct regular water quality testing at strategic locations;	Herpetofauna Water pollution		ESIA 2023	Pollution Prevention and Control Plan	All Project Worksites
61	Construction	■Monitor key parameters such as pH, dissolved oxygen levels, turbidity and presence of specific polluants;	Herpetofauna Water pollution		ESIA 2023	Pollution Prevention and Control Plan	All Project Worksites
62	Construction	■Establish clear protocols for reporting and responding to any water pollution incidents, including immediate corrective actions.	Herpetofauna Water pollution		ESIA 2023	Pollution Prevention and Control Plan	All Project Worksites
63	Construction	■Establish avoidance and exclusion zones around known reptile habitats to minimise risk of direct impacts. Clearly mark and communicate these zones to construction personnel to ensure compliance;	Herpetofauna Direct loss of species	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
64	Construction	■Implement a relocation plan. This involves capturing and translocating reptiles to suitable habitats away from the construction zone, ensuring their safety;	Herpetofauna Direct loss of species	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
65	Construction	■Provide comprehensive training to construction workers and equipment operators on reptile conservation and the importance of implementing mitigation measures;	Herpetofauna Direct loss of species	Owner	ESIA 2023	Biodiversity Management Plan	All Project Worksites
66	Construction	■Identify and compensate all land users for reduction in subsidies, including both formal and informal land users and prior to accessing the land; ■Provide compensation for loss of assets at replacement cost; ■Ensure appropriate disclosure of information, consultation, and the informed participation of those affected; ■Improve or, at a minimum, restore the livelihoods and standards of living of affected persons to pre-project levels, so as to facilitate sustainable improvements to socio-economic status;	Livelihood	EPC	ESIA 2023	Land Acquisition and Livelihoods Restoration Plan	All Project Worksites
67	Construction	■Selection criteria, job profiles, and number of workers for the construction phase with specific attention to the enhancement of the local community, women, and vulnerable groups' employment. ■Clear communication of required involvement of local workforce and local companies, explaining requirements on qualification, availability, eventual training, etc. ■Description of the recruitment process and details of the recruitment information disclosure to local communities. ■Details of vocational trainings available to employed construction workers. ■Description of the Worker's Code of Conduct, highlighting labour conditions with an aim to reduce the risk of gender-based violence and harassment. ■Details of worker's grievance mechanism that will be disclosed during the recruitment process and the employment period. ■A commitment to provide workers with a sufficient notice period as to when their job contract terminates. ■Monitoring indicators and the reporting timeline for the recruitment process and management of the workforce.	Economy, Employment and Income	Project Owner	ESIA 2023	Workforce Management Plan	All Project Worksites
68	Construction and Operation	■Ensure regular, open and transparent communication with all stakeholders	Economy, Employment and Income	Project Owner	ESIA 2023	Stakeholder Engagement Plan	All Project Worksites and location, Social AoI
69	Construction	■Ascertain, prior to the construction phase, whether the local services are sufficient for workforce influx and, where appropriate, liaise with relevant authorities to limit the negative impact of the Project on local users' access to public services.	Infrastructure and Public Services	Project Owner	ESIA 2023	Workforce Management Plan	All Project Worksites
70	Construction	■The WTGs will be equipped with anti-collision lighting and marking systems in line with the national standards and/or good industry practices to prevent possible accidents with aviation.	Community Health and Safety	Project Owner	ESIA 2023	N/A - Project Design aspect	All Project Worksites
71	Construction	■Enhancement of local employment through sourcing employees from the direct Social Aoi and limiting the numbers of non-local workers.	Community Health and Safety	Project Owner	ESIA 2023	Workforce Management Plan	Social AoI
72	Construction	■Enforcement of Workers' Code of Conduct containing a set of rules on behavioural standards and cultural awareness requirements for all employees (including security personnel)	Community Health and Safety	Project Owner	ESIA 2023	Workforce Management Plan	All Project Worksites
73	Construction	■Provide workers with safety equipment to prevent occupational health issue and reduce the number of accidents at work;	Labour and working conditions	EPC	ESIA 2023	Health & Safety Management Plan	All Project Worksites
74	Construction	■Provide regular training on first aid and safety responses in order to limit accidents' impact on workers' health;	Labour and working conditions	EPC	ESIA 2023	Health & Safety Management Plan	All Project Worksites
75	Construction	■Hold safety briefings with the employed labour force to ensure greater attention to detail and safety, especially when performing work activities in dangerous environments, i.e. working at heights during the wind turbine construction;	Labour and working conditions	EPC	ESIA 2023	Health & Safety Management Plan	All Project Worksites
76	Construction	■Ensure that the appropriate accommodation is provided to all workers, in line with IFC PS2 and national requirements.	Labour and working conditions	EPC	ESIA 2023	Workforce Management Plan	All Project Worksites
77	Construction	■Demarcate construction boundaries and minimize areas of surface disturbance; ■Where possible, locate laydown areas and construction camps in areas that are already disturbed or cleared of vegetation; ■For the construction site maintenance, conduct good housekeeping on site to avoid litter and minimize waste; ■Use existing tracks/roads for access, where possible; and ■Within the environmental management system, prepare a restoration management plan including replanting indigenous species, and landscaping and rehabilitating construction yards.	Landscape	EPC	ESIA 2023	Topsoil Management and Site Reinstatement Plan	All Project Worksites
78	Construction and Operation	■Where possible, locate laydown areas and construction camps in areas that are already disturbed or cleared of vegetation; ■For the construction site maintenance, conduct good housekeeping on site to avoid litter and minimize waste; ■Minimize night lighting while guaranteeing the minimum safety level; ■Use of materials that will minimize light reflection should be used for all Project components; ■Existing vegetation should be retained to the greatest extent possible. Vegetation should be retained along roads, and other Project infrastructure	Visual	EPC	ESIA 2023	Topsoil Management and Site Reinstatement Plan; Health & Safety Management Plan	All Project Worksites

79	Construction and Operation	■Rehabilitation of all viable disturbed areas (e.g. temporary access tracks and laydown areas) must be undertaken following construction. This must be done in such a way so as to facilitate natural regeneration of vegetation; ■Maintain ongoing engagement between the Project and local communities, with communities informed in advance of any vegetation clearing to allow pre-harvesting of resources such as building materials or other useable resources.	Ecosystem Services	EPC	ESIA 2023	Topsoil Management and Site Reinstatement Plan: Stakeholder Engagement Plan	All Project Worksites
80	Construction and Operation	■Compensate land users for the loss of their specific interest in part of the pastureland for a period of time and assistt them in their re-establishment, if required, once the constructions works are completed	Livelihood Ecosystem services	Project Owner	ESIA 2023	Livelihood Restoration Plan	All Project Worksites
81	Construction	■Work with local authorities in scheduling truck deliveries, especially oversized truck deliveries, to reduce impacts on road function and safety. Specifically: -Where safe and feasible, schedule deliveries to minimize travel impacts for other road users based upon local conditions and the results of stakeholder engagement. Consider scheduling deliveries during non-peak hours and at intervals to avoid queuing of delivery vehicles along public roads near the access points to internal Project roads. (construction, operations, decommissioning). -Consider scheduling deliveries, especially the oversized turbine components, in convoys of multiple trucks at one time to reduce the frequency of road travel interruption and delays. (construction, decommissioning). -Consider movement of oversized or escorted loads at night, if feasible and safe, to reduce impact to road function. (construction, operations, decommissioning).	Traffic	EPC	ESIA 2023	Traffic and transport Management Plan	All Project Worksites
82	Construction	■Regularly inform, educate, and update stakeholders and communities close to transport routes about Project traffic, especially about the safety issues and scheduling associated with movement of heavy and oversized loads on public roads.	Traffic	Project Owner	ESIA 2023	Traffic Management Plan; Stakeholder Engagement Plan	All Project Worksites
83	Construction, Operation, Decommissioning	■Obtain necessary permits and implement all necessary road improvements or alterations prior to use of the routes for oversized Project shipments. (construction, operations, decommissioning). ■Restore signs, street lights and other street furniture removed for or damaged by the movement of Project-related trucks. (construction, operations, decommissioning). ■Survey the condition of roads to be used for concrete, supply, equipment, and component deliveries prior to construction and submit reports to local road authorities. (pre-construction). ■Repair road damage resulting from construction traffic during the 18 months construction period (construction). ■Upon completion of the construction and decommissioning phases, work with local road authorities to identify damage to and restore county, communal, and agricultural roads used for Project-related heavy truck traffic. Coordinate with national road authorities (the Romanian National Road Infrastructure Company, or CNAIR) to coordinate and contribute to repair and maintenance of national roads damaged by construction. (construction, decommissioning). ■Upon completion of construction, install road signage for the new public roads built for the Project as required by the local road authorities. (construction). ■Upon completion of construction, in coordination with local road authorities and stakeholders, establish a schedule to be implemented by the Proponent and other stakeholders for maintenance of roads within the Project area during wind farm operations. (construction).	Traffic	EPC	ESIA 2023	Traffic and transport Management Plan	All Project Worksites
84	Construction, Operation, Decommissioning	■Address transportation safety risks of Project traffic, including (but not limited to) truck routes, hours of transport, community notification, signage, education, and other measures to minimize safety hazards. (construction, decommissioning) ■Obtain permits and implement alterations prior to deliveries. If necessary, construct bypasses to avoid hazards to properties or other road users at constrained road segments or intersections. (pre-construction, construction, decommissioning) ■Plan truck routes for non-oversized loads using roads with adequate geometrics and load-bearing capacity for safe passage. (pre-construction, construction, operations, decommissioning) ■Consider community schedules that result in higher levels of local traffic, school schedules, or community events. Schedule truck traffic outside of these times in addition to avoiding periods of peak traffic volumes. (construction, operations, decommissioning)	Traffic	EPC	ESIA 2023	Traffic Management Plan	All Project Worksites
85	Construction, Operation, Decommissioning	■Establish and implement standards addressing the following: -Training and accreditation for project drivers, including contractors. -Driver fitness standards, including mandatory rest periods and prohibition of drug/alcohol use. -In-vehicle monitoring systems to monitor vehicle speed and location (Project vehicles and contractors). -Project and contractor standards for vehicle safety and maintenance. -Security response for vehicle incidents. -Road stability standards.	Traffic	EPC	ESIA 2023	Traffic Management Plan	All Project Worksites
86	Construction	■Design and implement a Chance Finds Procedure to manage any unexpected discovery of archaeological material in-line with international requirements and guidelines IFC PS8.	Cultural Heritage	EPC	ESIA 2023	Cultural Heritage Management Plan	All Project Worksites
87	Operation	■Continuously assess identified and any potentially sensitive receptors, where shadow flicker modelling indicates the amount could exceed 30 hours per year and 30 minutes per day, to ascertain the extent of existing natural visual screening in place. If not existing, the occurrence of shadow flickering during operation could be further investigated, and if confirmed, natural screening could be implemented to minimize the effect.	Shadow Flicker	EPC	ESIA 2023	Health & Safety Management Plan	All Project Worksites
88	Operation	■If grievances will be received or if natural visual screening at potentially sensitive receptors are found to be insufficient, investigations to implement architectural/structural screening, such as the installation of blinds, window shades, window tinting, awnings or fences, at affected receptors could be evaluated to further minimize the effect of shadow flicker.	Shadow Flicker	EPC	ESIA 2023	Health & Safety Management Plan	All Project Worksites
89	Operation	■Use of turbine control strategies which shut down turbines when shadow flicker is likely to occur.	Shadow Flicker	EPC	ESIA 2023	Health & Safety Management Plan	All Project Worksites
90	Construction and Operation	■Throughout the Project's construction phase, it's essential to incorporate effective noise mitigation and management practices to lower noise levels and mitigate any potential impacts to the greatest extent possible. Various strategies for mitigation and management are accessible, and the selection of those deemed feasible, reasonable, and practical for the specific tasks at hand should be carefully considered. For instance: -Avoid unnecessary noise due to idling diesel engines and fast engine speeds when lower speeds are sufficient; -Ensure all machines used on the site are in good condition, with particular emphasis on exhaust silencers, covers on engines and transmissions and squeaking or rattling components. Excessively noisy machines should be repaired or removed from the site; -Ensure that all plant, equipment, and vehicles movements are optimized in a forward direction to avoid triggering motion alarms that are typically required when these items are used in reverse; -During the construction design, choose appropriate machines for each task and adopt efficient work practices to minimize the total construction period and the number of noise sources on the site. Select the quietest item of plant available where options that suit the design permit; -High noise-generating construction works and activities should be limited to the daytime period (7 AM to 10 PM), and work should be avoided on Sundays or public holidays if possible;	Noise and Vibratiion	EPC	ESIA 2023	Operational Noise Management Plan	All Project Worksites

91	Construction and Operation	■ Works associated with transmission line and access road construction often require activities in closer proximity to receptors that are not affected by construction works at wind turbines or permanent facilities. In these circumstances, task-specific noise mitigation and management measures should be implemented (when works are close to receptors) to reduce noise impacts to acceptable levels;	Noise and Vibratiion	EPC	ESIA 2023	Operational Noise Management Plan	All Project Worksites
92	Construction and Operation	■ Where possible, significant noise-generating vehicle movements should be limited to the daytime period. Where it is not possible for this to occur drivers should be instructed to arrive and depart as quietly as possible. Whilst on-site and in close proximity to receptors the drivers should be instructed to implement good-practice noise management measures to reduce peak noise levels and minimize any impacts as far as practicable. During the works, instruct drivers to travel directly to site and avoid any extended periods of engine idling at or near residential areas, especially at night.	Noise and Vibratiion	EPC	ESIA 2023	Operational Noise Management Plan	All Project Worksites
93	Construction and Operation	■ If any validated noise complaints are received, the problem source and any potential noise-reducing measures should be identified and evaluated for implementation during the works. If the noise complaint cannot be validated, no further mitigation or management measures are required.	Noise and Vibratiion	EPC	ESIA 2023	Operational Noise Management Plan	All Project Worksites
94	Operation	■ Limiting the hours of operation for specific pieces of equipment or operations, especially mobile sources operating through community areas ■ Reducing project traffic routing through community areas wherever possible ■ Developing a grievance mechanism to record and respond to complaints ■ Emissions from on-road and off-road vehicles will comply with national and EU standards	Community Health and Safety	EPC	ESIA 2023	Health & Safety Management Plan	All Project Worksites
95							
96							
97							
98							
99							
100							
101							
102							
103							
104							
105							
106							

Ref.	Phase	Commitment
0	1	2
1	Construction/Operation	■Compliance with the conditions stipulated by regulatory acts of competent authorities; ■Compliance with to GEO 57/2007; ■Prohibition of harvesting/commercial trade of any species of fauna or flora with conservation value; ■Approval and implementation of required measures for natural habitats restoration and populations of affected species in the event of an accident will be overseen by ANANP and carried out by the project owner; ■Waste disposal is strictly prohibited within the protected sites; ■In case of accidental harm to qualifying species of ROSCI0259 and ROSPA0145, ANANP must be promptly notified for the application of sanctions and cost recovery from the responsible party; ■The construction phase will be scheduled to consider the post-natal period of Spermophilus citellus, i.e., late April to mid-May; ■Vehicles traffic allowed only on established roads; ■Implementation of pollution prevention measures for abiotic factors.
2	Construction/Operation	■Consistently monitor the impacted species and habitats outlined in the Specific Conservation Objectives for ROSCI0259 and ROSPA0145;
3	Construction/Operation	■Report the completion date of the approved works and coordinate with the reception commission. ■Maintain the construction permit, technical documentation, and related project materials in pristine condition. ■Dismantle temporary construction on the site within recommended days following the actual completion of the works. ■Present the "Building Energy Performance Certificate" during the final inspection of the works.
4	Construction/Operation	■Implement measures and notify authorities in case of archaeological chance finds during construction.
5	Construction/Operation	■Adhere to specified conditions for public domain use, protection, and environmental preservation.
6	Construction/Operation	■Apply for the "Fire Safety Authorization" post-reception or before starting Project facilities operation.
7	Construction/Operation	■Ensure transportation of site of materials that cannot be reclaimed or repurposed, remaining after construction.
	Construction/Operation	■The works will be conducted while adhering to the conditions imposed by regulatory acts issued by authorities. ■Approved machinery and transport means will be used to avoid spills of petroleum products and lubricants, noise, vibrations, etc. ■Handling of fuels, materials, or other substances will be done in a way that prevents accidental spills on the ground or in water, avoiding dissolution and entrainment by precipitation water.
	Construction/Operation	■Waste resulting from the works will be collected in specially designated areas and then evacuated to specific waste disposal sites based on contracts. ■Recyclable waste will be delivered to specialized units for recycling. ■Construction material storage will be in specially designated areas.
	Construction/Operation	■Construction material storage will be arranged to avoid blocking access routes (roads, driveways) and prevent wind or rainwater from carrying them away. ■Optimization of the transport route for construction materials will be implemented to utilize existing roads only. ■Necessary measures will be taken to prevent material losses during transportation. ■Project implementation will be conducted without disrupting traffic in the area. ■The construction site organization will be arranged to avoid affecting traffic.

	Construction/Operation	■Notify the competent environmental protection authority if new elements, unknown at the time of issuing regulatory acts, or modifications to the conditions that formed the basis for issuing regulatory acts, occur before the implementation of the changes.
	Construction/Operation	■At the completion of the works, the removal of the construction site setup will be carried out, and restoration work will be performed in the area. The land temporarily taken out of agricultural circulation will be returned to its initial state. The site will be cleaned, and the land will be restored to its original condition. ■All specific activities will be strictly carried out within the approved perimeter, aiming to minimize the areas designated for construction or construction organization.
	Construction/Operation	■Electric cables will be buried to prevent the risk of increased bird mortality through contact with them.
	Construction/Operation	■Follow the recommendation in the presentation memorandum, according to which, during the works, field teams must be accompanied by an expert in the field of biodiversity conservation. ■Monitor the project's impact on habitats and species of community interest and promptly inform the authority responsible for the administration of protected natural areas (A.N.A.N.P. - Territorial Service Buzau) about any incidents that could have a negative impact. ■Instruct the personnel and ensure compliance with the following prohibitions (according to the provisions of Emergency Ordinance no. 57/2007, Article 33): -Any form of harvesting, capture, killing, destruction, or harm to individuals in their natural environment at any stage of their biological cycle is prohibited. -Deliberate damage, destruction, or intentional collection of nests and/or eggs in nature, even if empty, is prohibited. -Intentional disturbance during the breeding, growth, hibernation, and migration periods is prohibited. -Deterioration and/or destruction of breeding or resting places are strictly prohibited. ■If project personnel observe harm or fatalities among strictly protected bird or animal species report the incident promptly to the relevant regulatory authority. Actively assist in the retrieval of affected specimens and complete the necessary declaration. ■In the case of an imminent threat with significant negative effects on achieving or maintaining a favorable conservation status of habitats or species, take immediate preventive measures and inform the relevant regulatory authority. ■The monitoring will be conducted in accordance with the monitoring plan outlined in the adequacy assessment study and the environmental report prepared for the approval documentation of the Urban Planning Zoning (PUZ). This involves monitoring the populations of fauna species included in the standard form of the Natura 2000 site ROSCI0259 and ROSPA0145 during migration periods for a duration of 2 years. The focus will be on counting the number of dead birds in the turbine area.
	Construction/Operation	■Activities necessary for carrying out the works will strictly take place on the surfaces described in the project, with the strict prohibition of occupying other lands and/or deforesting vegetation in the vicinity. ■Crossing the watercourses with machinery in the project area is strictly forbidden.
	Construction/Operation	■Wind turbine stations must be signaled during the night with intermittent red lights with a large interval between two consecutive illuminations.

Topics	Responsibility	Source Document	Management Plan Reference
3	4	5	6
Biodiversity	Owner/EPC	Approval issued National Agency for Protected Areas (ANANP):	Biodiversity Management Plan, Pollution Prevention and Control Plan
Biodiversity	Owner/EPC	Approval issued National Agency for Protected Areas:	Biodiversity Management Plan
Environmental Compliance	Owner/EPC	Construction Permit	Topsoil Management and Site Reinstatement Plan
Cultural Heritage	Owner/EPC	Construction Permit	Cultural Heritage Management Plan
Designated and Protected Areas	Owner/EPC	Construction Permit	Traffic Management Plan
Community Health and Safety	Owner/EPC	Construction Permit	Health & Safety Management Plan
Waste and Wastewater	Owner/EPC	Construction Permit	Waste Management Plan
Environmental Compliance	Owner/EPC	Environmental Final Decision	Pollution Prevention and Control Plan
Waste and Wastewater	Owner/EPC	Environmental Final Decision	Waste Management Plan
Traffic	Owner/EPC	Environmental Final Decision	Traffic and transport Management Plan

Environmental Compliance	Owner	Environmental Final Decision	Pollution Prevention and Control Plan
Environmental Compliance	Owner/EPC	Environmental Final Decision	Pollution Prevention and Control Plan
Biodiversity	Owner/EPC	Environmental Final Decision	Biodiversity Management Plan
Biodiversity	Owner	Environmental Final Decision	Biodiversity Management Plan
Environmental Compliance	Owner/EPC	Environmental Final Decision	Pollution Prevention and Control Plan
Community Health and Safety	Owner/EPC	Construction Permit	Health & Safety Management Plan

Appendix A.3 Attachment 3: Monthly Monitoring and Reporting

Minimum Reporting Requirements of basic data and statistics		Measure	Frequency
Environmental and Social Incidents and Corrective Actions			
Fatality	Death occurring on the site. Fatalities arising from natural causes may be excluded after analysis if it can be demonstrated a natural death	Number	monthly
Dangerous occurrences / Major injury (or Reportable injury as defined under OSH Law)	Reportable incident under national law	Number	monthly
Lost Time injury	A serious injury which results in worker being incapacitated for more than three consecutive days	Number	monthly
Cumulative man-hours lost	Cumulative running total of lost man-hours	Number	monthly
Incidents / near misses	Actions with the potential to cause injury, ill health, or loss in the areas of environment, health & safety, security and labour management.	Number	monthly
Property incident	Incident that causes damage to property outside the project ownership (community property) that has not been agreed in advance	Number	monthly
Security incident	An incident that involves security guards or other law enforcement officials. This may or may not result in an injury (which should be reported separately)	Number	monthly
Environmental incident	Actions with the potential to cause injury, ill health, or loss in the areas of environment, health & safety, security and labour management.	Number	monthly
non-compliances	Failure to meet requirement set out in Law or project permit	Number	monthly
non-conformance	Failure to meet requirements of IFC Performance Standards or GIIP	Number	monthly
First Aid injury	Incident that causes an injury or illness which requires limited treatment available at site	Number	monthly
Total working hours (cumulative)		Number	monthly
Total working hours (this week / month)		Number	monthly
Summary of statistics	summary of weekly statistics including analysis and description of key incidents and actions taken.	number and description	monthly
Employee / Labour Grievances			
Number of Employee Grievances **submitted**	n.b includes any strike action etc.	Number	weekly
Number of Employee Grievances **resolved**		Number	weekly
Number of Disciplinary procedures/actions		Number	monthly
Staff turnover: Hire / Leavers		Number	monthly
Water			

Minimum Reporting Requirements of basic data and statistics		Measure	Frequency
Water Consumption (as applicable)			
Groundwater abstraction	Ground water from boreholes, wells, underground aquifers, etc.	m3	monthly
Surface water abstraction	Abstraction from river, sea or lake, etc.	m3	monthly
Municipal water consumption	Potable or process water supplied by a water utility	m3	monthly
Drinking water	Any drinking water delivered (either by tank or in bottles)	litres	monthly
Waste Water discharge (as applicable)			
Total waste water discharges collected by tanker for offsite treatment and disposal, or discharged directly to sewer.	Record all waste water discharges and collections. Must be collected by approved contractor for final treatment and disposal.	m3	monthly
Total discharge to surface waters / ground	Record all waste water waste water discharges to surface water or ground should only occur if explicitly permitted and AFTER primary treatment. Only clean runoff water is permitted to be discharged to surface waters / ground.	m3	monthly

Waste (as applicable)			
Hazardous solid waste	solid hazardous waste that is sent to landfill or treated/managed by specialist waste contractor.	tonnes	monthly
Hazardous liquid waste	liquid hazardous waste that is sent to landfill or treated/managed by specialist waste contractor.	m3	monthly
Non-hazardous waste	Any waste which is sent to dump / landfill site etc	m3	monthly
Recycled (solid)	wood, metals, glass, plastics, paper, cardboard, etc..	tonnes	monthly
Recycled (liquid)	Litres of recycled waste, including recycled hazardous material (i.e. oil)	m3	monthly

Energy Consumption (as applicable)			
Key equipment fuel use (quantities according to fuel type)	Relevant to all aspects of Contractors activities including, accommodation, offices, etc. This should include all generators and any other key site equipment such as diggers cranes etc. Record total quantities in litres according to fuel type.	litres	monthly
Transport vehicles fuel use (quantities according to fuel type)	Total fuel consumption of Contractors vehicles both within and offsite, including transport of all materials and equipment to site.	litres	monthly
Refrigerants (quantities according to each refrigerant type)		litres	monthly
Electricity consumed	Total electricity consumption of Contractor (including accommodation, offices, etc)	MWh	monthly

Employee Numbers (Including Sub-Contractors)			
TOTAL EMPLOYEES (no. of employees)		Number	monthly

Minimum Reporting Requirements of basic data and statistics		Measure	Frequency
Total working hours		Number	monthly
permanent		Number	monthly
contractor		Number	monthly
intern		Number	monthly
casual labourer		Number	monthly

Employee Local Content and Gender (including subcontractors)							
Position type	number days/hrs per position according to where they are employed from as well as differentiate male and female	Local*		Romania		International	
		M	F	M	F	M	F
Low skilled worker days/hrs							
Semi-skilled worker days/hrs							
Skilled worker days/hrs							
Managerial position							
Total							

** local is defined as*

Training and Emergency Response			
Emergency response drills / training completed	Provide supplementary infomration in appendix. Incorporate corrective action in CAP.	Number	monthly
Tool box talks completed	List all tool box talks completed, highglight tool box talks realted to emergency prepardness.	Number	monthly
Induction completed	Applies to all contractors, sub-contractors, workers and visitors.	Number	monthly

Other requirements / positive interactions
Include information on number JHA, training, details of audits, number of safety induction performed during the month and the confirmation of the 100% rate coverage, number of inspections done during the month and cumulated, number of training session, tool box, etc. during the month and cumulated and drills etc. Append weekly inspection report and checklists, corrective action plan.

Appendix A.4 Attachment 4: Monitoring Matrix

Reference	KPI	Target	Frequency	Monitoring measure	Responsibility
EPRP-1	Emergency Response Team (ERT)	Establish ERT and assign responsibilities	Within 1 week of site mobilisation	Minutes of meeting, and names of individuals, training records	Contractor
EPRP-2	EPRP Equipment and Resources	100% identification and deployment of suitable EPRP equipment and resources present at site	Within 1 week of site mobilisation	Review of inventory and visual confirmation / photo evidence	Contractor
EPRP-3	Engagement with emergency services	Established contacts and agreements with emergency services, undertake assessment of capacity	Within 1 week of site mobilisation	Minutes of meetings, and memorandum of understanding (where appropriate)	Contractor
EPRP-4	Risk Assessment EPRP completed	100% completion of Emergency hazards and risk assessments completed to identify and mitigate emergency scenarios	Within 1 week of site mobilisation	Completed risk register and emergency response procedures for each relevant scenario	Contractor
EPRP-5	Employee Awareness	Induction training package includes EPRP requirements and awareness	Monthly	Site induction package records	Contractor
EPRP-6	Mock Drills	100% of planned mock drills completed	Every 3 months	Compliance with mock drill schedule (as approved by Owner) / Mock drill outcome reports	Contractor
CHSP - 1	Community grievances	All community grievances acknowledged within 24 hours and resolved within 30 days	Monthly	% Resolved grievances	Owner
SMP-1	Security incidents	No security incidents between community and security personnel	Monthly	Community grievances	Contractor
OHS - 1	Injuries and work-related ill health in terms of LTI	ZERO number of days off work resulting from LTI (the does not consider the initial day of injury or onset of illness)	Monthly	Incident statistics	Contractor
OHS - 2	Percentage of workers with OHS induction training	100%	Monthly	Induction records	Contractor

Reference	KPI	Target	Frequency	Monitoring measure	Responsibility
OHS - 3	Percentage of weekly meetings where OHS is addressed	100%	Monthly	Weekly minutes of meetings	Contractor
OHS - 4	Number of JHA completed before each work activity 100%	100%	Monthly	Completed JHA / risk assessments	Contractor
OHS - 5	Number of incidents or near misses closed out within 24 hours of observations	100%	Weekly	Review of CAP	Contractor
WMP-1	Training on site waste management	100% of all employees receive site induction including waste training	Monthly	Site induction records and attendance register	Contractor
WMP-2	All hazardous materials	100% of materials have MSDS and Job Hazard analysis (JHA) when used	Monthly	JHA records and MSDS sheets	Contractor
WMP-3	Waste management	No waste incidents	Monthly	Incident reports	Contractor
WMP-4	Waste segregation	100% segregation of waste into defined categories	Monthly	Waste volume record	Contractor
WMP-5	Waste Records	100% record of waste transfer volumes and to 3rd parties for disposal	For each offsite disposal	Waste records	Contractor
PPC-1	Induction	100% of all employees (contractor and sub-contractor) received site induction (that includes reference to PPC)	Monthly	Site induction records	Contractor
PPC-2	Good site housekeeping (control of noise, dust, hazardous material management, effluent discharges)	Daily walk-around inspection includes check for noise and dust events, good housekeeping and storage of hazardous materials.	Daily	Completed Daily Logs	Contractor
				Timely close out of actions in Corrective Action Plan (CAP)	Contractor
PPC-3	Noise and dust control – community nuisance	No community complaints relating to environmental noise or dust	Monthly	Community complaints log	Owner

Reference	KPI	Target	Frequency	Monitoring measure	Responsibility
PPC-4	All work activities generating pollution / use hazardous materials addressed in JHA	100% of JHA consider PPC matters	Monthly	JHA record	Contractor
PPC-5	Correct use of PPE when conducting tasks using hazardous materials	100% of correct PPE in use on site.	Daily visual inspections	Daily checklist	Contractor
				Close out of actions in CAP	Contractor
PPC-6	No. of unplanned released to the environment	No unplanned releases to air, water or land	Monthly	Incident reporting register	Contractor
PPC-7	Number of near miss reports reviewed and shared via tool box talk	All near misses addressed via tool box talk	Monthly	Records of near misses	Contractor
				Records of tool box talks	Contractor
LMP-1	Worker Selection	All employment opportunities are transparent and in accordance with labour commitment code and local content policy	Every month during an intensive period of recruitment	Weekly workforce statistics	Contractor
				No. of community grievances	Contractor
LMP-2	Local/National Content	Disclosure of local content / hiring policy to local community	Weekly	% of work force made up of local workers	Contractor
		(see Section 7.1 for further breakdown)		% of work force made up of non-nationals	Contractor
LMP-3	Training	Completion of training as per approved training matrix.	Monthly	% of completion of training for each role type	Contractor
LMP-4	Working Conditions	100% of workers with written contract	Monthly	Al workers with a written contract	Contractor
		100% of workers able to show compliance with working hours restrictions.		Average working hours per week.	Contractor
				Weeks in which no workers hours exceeded 50 hours.	Contractor
		100% workers paid on time.		Review grievances and % of grievances closed/responded to.	Contractor
		No worker grievances		Copies of pay slips	Contractor
LMP-5	Labour Management Plan/System/Processes	Contractor to perform audit of 1	When each new sub-contractor comes on board	Contractor labour audit and CAP	Contractor

Reference	KPI	Target	Frequency	Monitoring measure	Responsibility
LMP-6	Compliance with national labour requirements	100% compliance with national labour regulations	When each new sub-contractor commences contract	National labour regulation compliance audit (independent third party)	Contractor
CFP - 01	Log of chance finds (in the event of findings)	All chance finds encountered must be logged	Monthly	Chance finds log	
CFP – 2	All graves moved	100% of known grave are moved prior to works	One time	Grace Relocation Plan (one per grave) and Grave Relocation Report (one per grave).	Contractor
CFP – 3	Incidents on known cultural heritage sites	Zero incidents reated to cultural heritage	Monthly	Incident Log	Contractor
Sep-01	All stakeholders made aware of the SEP and grievance mechanism (as set out in the SEP).	100% of actions identified in the SEP program are implemented.	Ongoing	Conformance to SEP program	Owner
Sep-02	All grievances acknowledged with 48 hours.	100% of grievance acknowledged within 48 hours.	Ongoing	Grievance log	Owner
SEP – 03	All grievances resolved within 30 days.	100% of grievance resolved within 30 days (or under an agreed corrective action plan).	Ongoing	Grievance log	Owner
TMP-1	Traffic and transportation management measures contained in site induction.	100% of all employees (contractor and sub-contractor) received site induction.	Monthly	Site induction records.	Contractor
TMP-2	Delivery vehicles.	Daily vehicle Log and total vehicles entering site.	Daily	Completed daily logs.	Contractor
TMP-3	Record of driver training.	100% all drivers provided evidence of driver training and competence and signed onto driver code of conduct.	Monthly	Signed code of conduct. Copies of driving licenses and special driving licenses.	Contractor
TMP-4	Vehicle condition (T2 above).	100% of vehicles on site completed vehicle condition report.	Monthly	Vehicle maintenance logs.	Contractor

Appendix A.5 Attachment 5: Supporting Forms

Attachment 6: Supporting sub plans

Reference	National / International	Legal instrument, standard or guidline

Authority	Permit name	Document	REF #	Target date	Issue date	Expiry Date	Responsibility

Project Component	Reference document	reference number	Action Item	Mitigation Measure/Obligation	Dates/Timeframe	Responsibility for implementation	Conflicts / action

Ref	Inspection / Audit type	Description	Frequency	Responsibility
1	Site set up audit	Checks all EHS provisions as per the CESMP and supporting sub-plans have been put in place by the Contractor (s)	within 3 weeks of mobilisation	ESHS Manager
2	EHS site inspection	Using an inspection checklist to do checks for first aid facilities, fire prevention, emergencies, site security, PPE etc.	Weekly	ESHS Manager
3	ESMP compliance audit	includes checks on traffic management, waste management, pollution prevention etc.	Monthly	ESHS Manager
4	Labour compliance audit	includes checks on contracts, payment, working hours, welfare etc.	Within 3 weeks of new contractor start on site	ESHS Manager
5	Health and Safety audit	Includes checks on Contractor lifting equipment, PPE, fall arrest systems, fire protection, PTW system etc.	Monthly	ESHS Manager
6	Management safety walk	Site walk around by Owners site engineer to identify opportunities to improve the safety of workers on site	Monthly	ESHS Manager
7	Site closure audit	Checks all conditions for closing work site as per CESMP have been met.	Closure of work site / end of the construction phase	ESHS Manager
8	Social audit	Includes checks on transportation provisions (abnormal loads), communication with stakeholders, local content, workers' grievance mechanism, site induction etc.	Monthly	ESHS Manager

First Look Solutions S.A
Date: 15/10/2024

VIFOR Wind Project
TRAINING MATRIX

RE_ESMS_F05
Version 3.0

Legend
Mandatory
Planned

	Training Required (red required, green completed (with date), grey, not required)										
Employee	HSE Induction training	Training 2	Training 3	Training 4							
				#######							

Reference	KPI	Target	Frequency	Monitoring measure	Responsibility
EPRP-1	Emergency Response Team (ERT)	Establish ERT and assign responsibilities	Within 1 week of site mobilisation	Minutes of meeting, and names of individuals, training records	Contractor
EPRP-2	EPRP Equipment and Resources	100% identification and deployment of suitable EPRP equipment and resources present at site	Within 1 week of site mobilisation	Review of inventory and visual confirmation / photo evidence	Contractor
EPRP-3 / CHSP-4	Engagement with emergency services	Established contacts and agreements with emergency services, undertake assessment of capacity	Within 1 week of site mobilisation	Minutes of meetings, and memorandum of understanding (where appropriate)	Contractor
EPRP-4	Risk Assessment EPRP completed	100% completion of Emergency hazards and risk assessments completed to identify and mitigate emergency scenarios	Within 1 week of site mobilisation	Completed risk register and emergency response procedures for each relevant scenario	Contractor
EPRP-5	Employee Awareness	Induction training package includes EPRP requirements and awareness	Monthly	Site induction package records	Contractor
EPRP-6	Mock Drills	100% of planned mock drills completed	Every 3 months	Compliance with mock drill schedule (as approved by Owner) / Mock drill outcome reports	Contractor
CHSP - 1	Community grievances	All community grievances acknowledged within 24 hours and resolved within 30 days	Monthly	% Resolved grievances	Owner
SMP-1 / CHSP-5	Security incidents	No security incidents between community and security personnel	Monthly	Community grievances	Contractor
SMP-2	Screening / vetting of security personnel	100% security guards screened before commencing work on site	Ongoing - Monthly (part of EHS audit)	Verification documentation (criminal background checks etc.	EPC Contractor
SMP-3	Training of security personnel in line with Project requirements	100% of security personnel received training on UN Voluntary principles. Human rights	Ongoing - Monthly (part of EHS audit)	Signed training attendance records.	EPC Contractor
SMP-4	Verify that all personnel have the necessary licences / authorisations to operate in Romania	100% of all security personnel certified to work in Romania as security personnel	Ongoing - Monthly (part of EHS audit)	Training Matrix	EPC Contractor
OHS - 1	Injuries and work-related ill health in terms of LTI	ZERO number of days off work resulting from LTI (the does not consider the initial day of injury or onset of illness)	Monthly	Incident statistics	Contractor
OHS - 2	Percentage of workers with OHS induction training	100%	Monthly	Induction records	Contractor
OHS - 3	Percentage of weekly meetings where OHS is addressed	100%	Monthly	Weekly minutes of meetings	Contractor
OHS - 4	Number of JHA completed before each work activity 100%	100%	Monthly	Completed JHA / risk assessments	Contractor
OHS - 5	Number of incidents or near misses closed out within 24 hours of observations	100%	Weekly	Review of CAP	Contractor
WMP-1	Training on site waste management	100% of all employees receive site induction including waste training	Monthly	Site induction records and attendance register	Contractor
WMP-2 / CHSP-6	All hazardous materials	100% of materials have MSDS and Job Hazard analysis (JHA) when used	Monthly	JHA records and MSDS sheets	Contractor
WMP-3	Waste management	No waste incidents	Monthly	Incident reports	Contractor
WMP-4	Waste segregation	100% segregation of waste into defined catesories	Monthly	Waste volume record	Contractor
WMP-5	Waste Records	100% record of waste transfer volumes and to 3rd parties for disposal	For each offsite disposal	Waste records	Contractor
PPC-1 / CHSMP7	Induction	100% of all employees (contractor and sub-contractor) received site induction (that includes reference to PPC)	Monthly	Site induction records	Contractor
PPC-2	Good site housekeeping (control of noise, dust, hazardous material management, effluent discharges)	Daily walk-around inspection includes check for noise and dust events, good housekeeping and storage of hazardous materials.	Daily	Completed Daily Logs	Contractor
				Timely close out of actions in Corrective Action Plan (CAP)	Contractor
PPC-3 / CHSP8	Noise and dust control – community nuisance	No community complaints relating to environmental noise or dust	Monthly	Community complaints log	Owner
PPC-4	All work activities generating pollution / use hazardous materials addressed in JHA	100% of JHA consider PPC matters	Monthly	JHA record	Contractor
PPC-5	Correct use of PPE when conducting tasks using	100% of correct PPE in use on site.	Daily visual inspections	Daily checklist	Contractor
				Close out of actions in CAP	Contractor
PPC-6	No. of unplanned released to the environment	No unplanned releases to air, water or land	Monthly	Incident reporting register	Contractor
PPC-7	Number of near miss reports reviewed and shared via toot box talk	All near misses addressed via tool box talk	Monthly	Records of near misses	Contractor
				Records of tool box talks	Contractor
LMP-1	Worker Selection	All employment opportunities are transparent and in accordance with labour commitment code and local content policy	Every month during an intensive period of recruitment	Weekly workforce statistics	Contractor
				No. of community grievances	Contractor
LMP-2 / CHSP-9	Local/National Content	Disclosure of local content / hiring policy to local community	Weekly	% of work force made up of local workers	Contractor
		(see Section 7.1 for further breakdown)		% of work force made up of non-nationals	Contractor
LMP-3	Training	Completion of training as per approved training matrix.	Monthly	% of completion of training for each role type	Contractor
LMP-4	Working Conditions	100% of workers with written contract	Monthly	Al workers with a written contract	Contractor
		100% of workers able to show compliance with		Average working hours per week.	Contractor
				Weeks in which no workers hours exceeded 50 hours.	Contractor
		100% workers paid on time.		Review grievances and % of grievances closed/responded to	Contractor
		No worker grievances		Copies of pay slips	Contractor
LMP-5	Labour Management Plan/System/Processes	Contractor to perform audit of	When each new sub-contractor comes on board	Contractor labour audit and CAP	Contractor
LMP-6	Compliance with national labour requirements	100% compliance with national labour regulations	When each new sub-contractor commences contract	National labour regulation compliance audit (independent third party)	Contractor
CPP – 01	Log of chance finds (in the event of findings)	All chance finds encountered must be logged	Monthly	Chance finds log	
CPP – 2	All graves moved	100% of known grave are moved prior to works	One time	Grave Relocation Plan (one per grave) and Grave Relocation Report (one per grave).	Contractor
CPP – 3	Incidents on known cultural heritage sites	Zero incidents reated to cultural heritage	Monthly	Incident Log	Contractor
Sep-01	All stakeholders made aware of the SEP and grievance mechanism (as set out in the SEP).	100% of actions identified in the SEP program are implemented.	Ongoing	Conformance to SEP program	Owner
SEP - 02 / CHSP 10	All grievances acknowledged with 48 hours.	100% of grievance acknowledged within 48 hours.	Ongoing	Grievance log	Owner
SEP – 03	All grievances resolved within 30 days.	100% of grievance resolved within 30 days (or under an agreed corrective action plan).	Ongoing	Grievance log	Owner
TMP-1	Traffic and transportation management measures contained in site induction.	100% of all employees (contractor and sub-contractor) received site induction.	Monthly	Site induction records.	Contractor
TMP-2	Delivery vehicles.	Daily vehicle Log and total vehicles entering site.	Daily	Completed daily logs.	Contractor
TMP-3 / CHSP-11	Record of driver training.	100% all drivers provided evidence of driver training and competence and signed onto driver code of conduct.	Monthly	Signed code of conduct. Copies of driving licenses and special driving licenses.	Contractor
TMP-4	Vehicle condition (T2 above).	100% of vehicles on site completed vehicle condition report.	Monthly	Vehicle maintenance logs.	Contractor

Minimum Reporting Requirements of basic data and statistics		Unit of	Frequency
Environmental and Social Incidents and Corrective Actions			
Fatality	Death occurring on the site. Fatalities arising from natural causes may be excluded after analysis if it can be demonstrated a natural death	Number	monthly
Dangerous occurrences / Major injury (or Reportable injury as defined under OSH Law)	Reportable incident under national law	Number	monthly
Lost Time injury	A serious injury which results in worker being incapacitated for more than three consecutive days	Number	monthly
Cumulative man-hours lost	Cumulative running total of lost man-hours	Number	monthly
Incidents / near misses	Actions with the potential to cause injury, ill health, or loss in the areas of environment, health & safety, security and labour management.	Number	monthly
Property incident	Incident that causes damage to property outside the project ownership (community property) that has not been agreed in advance	Number	monthly
Security incident	An incident that involves security guards or other law enforcement officials. This may or may not result in an injury (which should be reported separately)	Number	monthly
Environmental incident	Actions with the potential to cause injury, ill health, or loss in the areas of environment, health & safety, security and labour management.	Number	monthly
non-compliances	Failure to meet requirement set out in Law or project permit	Number	monthly
non-conformance	Failure to meet requirements of IFC Performance Standards or GIIP	Number	monthly
First Aid injury	Incident that causes an injury or illness which requires limited treatment available at site	Number	monthly
Total working hours (cumulative)		Number	monthly
Total working hours (this week / month)		Number	monthly
Summary of statistics	summary of weekly statistics including analysis and description of key incidents and actions taken.	number and description	monthly
Employee / Labour Grievances			
Number of Employee Grievances **submitted**	n.b includes any strike action etc.	Number	weekly
Number of Employee Grievances **resolved**		Number	weekly
Number of Disciplinary procedures/actions		Number	monthly
Staff turnover: Hire / Leavers		Number	monthly
Water			
Water Consumption (as applicable)			
Groundwater abstraction	Ground water from boreholes, wells, underground aquifers, etc.	m3	monthly
Surface water abstraction	Abstraction from river, sea or lake, etc.	m3	monthly
Municipal water consumption	Potable or process water supplied by a water utility	m3	monthly
Drinking water	Any drinking water delivered (either by tank or in bottles)	litres	monthly
Waste Water discharge (as applicable)			
Total waste water discharges collected by tanker for offsite treatment and disposal, or discharged directly to sewer.	Record all waste water discharges and collections. Must be collected by approved contractor for final treatment and disposal.	m3	monthly
Total discharge to surface waters / ground	Record all waste water waste water discharges to surface water or ground should only occur if explicitly permitted and AFTER primary treatment. Only clean runoff water is permitted to be discharged to surface waters / ground.	m3	monthly
Waste (as applicable)			
Hazardous solid waste	solid hazardous waste that is sent to landfill or treated/managed by specialist waste contractor.	tonnes	monthly
Hazardous liquid waste	liquid hazardous waste that is sent to landfill or treated/managed by specialist waste contractor.	m3	monthly
Non-hazardous waste	Any waste which is sent to dump / landfill site etc.	m3	monthly
Recycled (solid)	wood, metals, glass, plastics, paper, cardboard, etc..	tonnes	monthly
Recycled (liquid)	Litres of recycled waste, including recycled hazardous material (i.e. oil)	m3	monthly
Energy Consumption (as applicable)			
Key equipment fuel use (quantities according to fuel type)	Relevant to all aspects of Contractors activities including, accommodation, offices, etc. This should include all generators and any other key site equipment such as diggers cranes etc. Record total quantities in litres according to fuel type.	litres	monthly
Transport vehicles fuel use (quantities according to fuel type)	Total fuel consumption of Contractors vehicles both within and offsite, including transport of all materials and equipment to site.	litres	monthly
Refrigerants (quantities according to each refrigerant type)		litres	monthly
Electricity consumed	Total electricity consumption of Contractor (including accommodation, offices, etc)	MWh	monthly
Employee Numbers (including Sub-Contractors)			
TOTAL EMPLOYEES (no. of employees)		Number	monthly
Total working hours		Number	monthly
permanent		Number	monthly
contractor		Number	monthly
intern		Number	monthly
casual labourer		Number	monthly

Employee Local Content and Gender (including subcontractors)							
Position type	number days/hrs per position according to where they are employed from as well as differentiate male and female	Local*		Romania		International	
		M	F	M	F	M	F
Low skilled worker days/hrs							
Semi-skilled worker days/hrs							
Skilled worker days/hrs							
Managerial position							
Total							

** local is defined as*

Training and Emergency Response			
Emergency response drills / training completed	Provide supplementary infomration in appendix. Incorporate corrective action in CAP.	Number	monthly
Tool box talks completed	List all tool box talks completed, highglight tool box talks realted to emergency prepardness.	Number	monthly
Induction completed	Applies to all contractors, sub-contractors, workers and visitors.	Number	monthly

Other requirements / positive interactions
Include information on number JHA, training, details of audits, number of safety induction performed during the month and the confirmation of the 100% rate coverage, number of inspections done during the month and cumulated, number of training session, tool box, etc. during the month and cumulated and drills etc. Append weekly inspection report and checklists, corrective action plan.

Fatality:	☐	External Complaint	☐
Dangerous Occurrence:	☐	Regulator notice/breach	☐
Incident / near miss:	☐	Spill / uncontrolled release	☐
Lost time:	☐	damage/loss	☐
Environmental incident:	☐	flora / fauna	☐
Security:	☐	audit/non compliance	☐

Date of incident:	Time of incident:
Section:	Location of incident:
Date reported:	Supervisor:

Employee ? Y / N

Subcontractor: Y / N

Subcontractor name:

Description of the circumstances of the incident (how and why) :

Details of any persons injured and treatment given:

Witness details / statements:

Preliminary findings: *e.g. were people following procedures, were they up to date, was the correct*

Recommendations / Actions:

Is further investigation required?

Is the incident reportable?

Are Lenders required to be notified?

Author of this report:	Approver name:
Date:	Date:

Ref.no	Non-conformance / incident / risk - description	Date of occurrence	Risk ranking (H /M /L)	Description of Action to be taken	Responsible staff	Time frame for implementation	Open / Closed

Reference	Date	Project Document

Reference No *(to be filled in by responsible person)*		
Full Name		
Address		
Contact Information and Preferred method of Please mark how you wish to be contacted (mail, telephone, e-mail).	◯ By Post: Please provide postal address: ◯ By Telephone: Please provide telephone number: ◯ By E-mail: Please provide E-mail address:	
Preferred language (please circle)	Romanian, Other (please state) _____	◯ English

Description of Incident or Grievance:	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of Incident/Grievance	

◯ One-time incident	◯ More than once (how many times? _____)	◯ On-going *(currently experiencing problem)*

How you think we should resolve the problem?

Ref. number	Date	Description of consultation	Type of meeting	Number of attendees	M/F	Summary of outcome / concerns	Follow up actions	Minutes of meeting (Yes / no)	date follow up actions closed