

ENVIRONMENTAL AND SOCIAL ACTION PLAN

PROJECT REFERENCE: MOLDOVA-ROMANIA POWER INTERCONNECTION PROJECT, PART 2: FEASIBILITY ASSESSMENT AND ESIA OF THE SECOND PRIORITY PROJECT, BACK-TO-BACK (BTB) BĂLȚI STATION AND 400kV OHL BĂLȚI – SUCEAVA

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
PR1	Assessment and Management of Environmental and Social Impacts and Issues						
1.1	Appointment of a suitably qualified and experienced Project Management Unit (PMU) to coordinate the implementation and to communicate with the national and European entities involved in the development of Project	E&S risk management and capacity	EBRD PR1	Ministry of Economy	Prior to financial close	PMU periodic reports to MOLDELECTRICA, Government and EBRD	
1.2	Implementation of the Project in accordance with the Project documents, including ESIA, ESMMP, LACF, SEP and present ESAP. Taking into consideration all the requirements of the national Environmental Agreement for the Project and other approvals obtain from local authorities	To ensure that impacts are avoided and mitigated as planned	EBRD PR1 Environmental legislation	MOLDELECTRICA resources and PMU	Throughout the life of the Project	PMU periodic reports to Project lenders	
1.3	Update ESIA if after the Final Design, there are significant modification related to Feasibility Study (OHL route, type of towers, etc)	To see if additional mitigation measures are needed	Good international practices	MOLDELECTRICA, EPC, contractor, and consultants	After Final Design and prior to any construction activity	Report to MOLDELETRICA and EBRD	
1.4	Update ESMMP and any management plans that required updating	To clearly define the measures for avoidance, mitigation, management and monitoring	EBRD PR1	MOLDELECTRICA, EPC, contractor, and consultants	When necessary / required	The revised plans to be disclose on MOLDELECTRICA website	

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1.5	<p>Appointment of a Project E&S manager included in the Project Implementation Unit (PIU) team.</p> <p>MOLDELECTRICA will provide full details of PIU structure, including numbers, roles, responsibilities, and experience. The profiles of E&S staff will be in accordance with the E&S commitments on the Project.</p>	Improved E&S performance and compliance	PR1	PIU/MOLDELECTRICA	Prior the beginning of the works on site, and throughout the construction works and operational phase	Submission of organizational chart, job description and CVs of appointed staff	
1.6	<p>Implement an ESMS for the implementation of the Project from the early stage and construction works to operational phase.</p> <p>The ESMS will establish roles and responsibilities well define in accordance with the environmental and social actions.</p>	<p>Especially manage E&S issues during construction and operational phase.</p> <p>Ensure that the mitigation measures proposed on ESIA are considerate.</p>	<p>PR1</p> <p>Good international practices</p>	PIU/MOLDELECTRICA	Prior the beginning of the works on site, and throughout the construction works and operational phase	Submission of ESMS	
1.7	<p>Implementation a contractor management plan with procedures and supplier contracts that comply with EBRD requirements/standards, including this ESAP.</p> <p>Include in each contractual documentation specific obligation to implement the E&S actions identified in Project documents as ESIA, ESSMP and LACF.</p>	Contractor E&S performance management	<p>PR1</p> <p>National environmental and social legislation</p>	PIU/MOLDELECTRICA	Before contract signature with contractors and the commencement of works on site	If is necessary revised the model contracts for works and services to include EBRD requirements and this ESAP	
1.8	Establish procedures and instructions, including reporting requirements for EPC contractor and their subcontractors, site audits and periodic meetings	<p>Manage E&S issues during constructions.</p> <p>Ensure that the mitigation measures proposed on ESIA are considerate.</p>	<p>PR1</p> <p>Good international practices</p>	PIU/MOLDELECTRICA	Prior the beginning of the works on site, and throughout the construction works	Submission of ESMS and relevant documents	

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1.9	<p>Develop and implement a Construction E&S Management Plan (CESMP) to implement ESIA commitments, national and EBRD requirements. CESMP is build both on legal and ESMP frameworks and has provisions for reporting requirements and regular training of staff.</p> <p>CESMP should contain the following items:</p> <ul style="list-style-type: none"> • Organizational structure, roles, and responsibilities • Mitigation of the cumulative Projects impact • ESIA commitments • Work Camp Management Plan • Waste and Materials Management Plan • Wastewater Management Plan • Land Clearing, Erosion Control and Site Restoration Plan • Procedure/Plan for Working Near Water • Air Quality and Emissions Management Plan/Procedures • Plan/Procedures for Noise and EMF Control • Spill Prevention and Response Plan • OHS Management Plan • Traffic Management Plan • Habitat Management Plan • Design Change Management Plan • Supply Chain Management Plan • Updated SEP, including Grievance Mechanism • ESMMP • Quality Assurance Program 	<p>Manage E&S issues during constructions.</p> <p>Ensure that the mitigation measures proposed on ESIA are considerate.</p>	<p>PR1</p> <p>Good international practices</p>	<p>EPC contractor and subcontractors</p> <p>Consultant (Supervising Engineer)</p>	<p>Prior the beginning of the works on site, and throughout the construction works.</p> <p>Workforce trained on CESMP before construction works starts on site</p>	<p>Submissions of CESMP and the monitoring program</p> <p>Annual EHS Report to EBRD to reflect the implementation of CESMP</p>	
1.10	<p>Prepared to deliver any additional information related to the existing areas with eroded soils (i.e. Geotechnical or soil erosion study), along the OHL route, if the final design will include significant updates/changes of the project</p>	<p>Ensure that the mitigation measures proposed on ESIA are appropriate</p>	<p>PR1</p>	<p>EPC contractor and subcontractors</p>	<p>Pre-construction period</p>	<p>... Submissions of CESMP</p>	
1.11	<p>Develop and implement an Operation E&S management Plan (OESMP) which will consist of plans and operational procedures for waste management, air emissions and ground water contaminations monitoring, OHS management, emergency preparedness and response, security personnel requirements, grievances mechanism for all workers on site and external stakeholders, and E&S performance monitoring.</p>	<p>Manage E&S issues during operation and maintenance phases.</p> <p>Ensure that the mitigation measures proposed on ESIA are considerate.</p>	<p>PR1</p> <p>Good international practices</p> <p>National legislation</p>	<p>MOLDELECTRICA</p>	<p>From Commencement Date and trough operation period</p>	<p>Submissions of OESMP and the monitoring program</p> <p>Annual EHS Report to EBRD to reflect the implementation of OESMP</p>	

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1.12	Develop and implement an Emergency Preparedness and Response Plan (EPRP) which will include> <ul style="list-style-type: none"> • Identification of emergency types and the response teams • Response procedures, equipment and supplies • Assessment of vulnerability of towers and substation to flood, wind, fire, etc • Assessment of adaptation/resilience measures to designs and/or maintenance procedures • Contact information of local/district/national authorities implied (police, medical, providers, responders, etc) 	Safe working environment and improved HS performance Adequate emergency response	PR1 PR4 Good international practice	MOLDELECTRICA Suitably qualified staff	Prior the beginning of the works on site, and throughout the construction works and O&M period	Submission of EPRP	
PR2	Labour and Working Conditions						
2.1	Develop and implement Human Resources (HR) policy and procedures aligned to EBRD and national legislation requirements. This will be disclosed to workers and shared with EPC contractor and subcontractors with a contractual obligation to be applied. The policy shall forbid the employment of staff below 18 years of age in the context of Project.	Improved human resources practices and compliance with national legislation and PR2 requirements	PR2 ILO standards National legislation	EPC contractors and subcontractors MOLDELECTRICA	Throughout construction and operation periods	HR management plans and procedures	
2.2	Unannounced and random HR audits of EPC contractors and subcontractors to identify any form of illegal employment as child labour, no work contracts, non-compliance with EBRD PR2 requirements	Avoidance of illegal/informal employment	PR2 ILO standards National legislation	EPC contractors and subcontractors MOLDELECTRICA	Throughout construction and operation periods	Quarterly Labour Audit Reports	
2.3	Develop and implement a grievance mechanism accessible to all workers. Grievance register maintained.	Worker grievance management	PR2	EPC contractors and subcontractors MOLDELECTRICA	Throughout construction and operation periods	Annual Labour Audit Reports	
2.4	Security personnel hired for construction and operation periods must be subject to a training based on UN Voluntary Principles on Security and Human Rights	Mitigation of risks related to non-employee security personnel	PR2	EPC contractors and subcontractors MOLDELECTRICA	Training prior to commencement of works	Annual Labour Audit Reports	

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2.5	To ensure local employment KPIs/targets are achieved by EPC contractor and subcontractors	Optimise the employment opportunities for local people Establishment good neighbouring relationship with communities	Managing expectation Good international practices	EPC contractors and subcontractors MOLDELECTRICA	Throughout construction and operation periods	Local recruitment offices are established Local employment KPIs reported to EBRD	
PR3	Resource Efficiency and Pollution Prevention and Control						
3.1	Develop and implement a Land Clearing, Erosion Control and Site Restoration Plan including at least measures for: <ul style="list-style-type: none"> • Maintained the works in the boundaries • Movement of off -road vehicles and equipment • Topsoil removal and storage • Spoil storage and disposal • Configuration of temporary and permanent spoil dumps • Using spoil as fill, in concrete, etc • Using slit fence, drainage control, flow retardation structures, settling pond, etc • Restoration of disturbed areas after the construction is complete 	Optimise the limits of works in site Reducing the loss of topsoil Revegetation of the disturbed areas	PR3 Good international practices	EPC contractors and subcontractors	Throughout construction works	Monitoring program Periodical inspection	
3.2	Develop and implement a Spill Prevention and Response Plan, including measures for the management of fuel and hazardous materials, avoiding the unexpected fuel or oil leakages, contaminated soil, etc.	Reducing the possibility of spilling on Project areas	PR3 Good international practices	EPC contractors and subcontractors MOLELECTRICA	Throughout construction and O&M periods	Design stage and periodical instruction of workers	
3.3	CEMSP should include within Pollution Prevention Plan and to implement the mitigation measures described in ESIA for air quality, soil, ground and wastewater management, noise, waste, and materials. CESMP also includes the monitoring provisions during construction works as defined in ESIA and ESMMP	Risk of air, soil and /or water pollution due to Project activities	PR3 National legislation	EPC contractors and subcontractors	Throughout construction works	Environmental monitoring program	

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3.4	OESMP should include and implement mitigation measures described in ESIA for the air quality, soil, ground and wastewater management, noise, waste, and materials. OESMP also includes the monitoring provisions during operation and maintenance defined in ESIA and ESMMP	Risk of air, soil and /or water pollution due to Project activities	PR3 National legislation	MOLDELECTRICA	Throughout O&M period	Environmental monitoring program	
PR4	Health and Safety						
4.1	Construction planning <ul style="list-style-type: none"> Reviewing/updating MOLDELECTRICA's OH&S certifications and management system Training programs Grievance Procedure Put in place an effective grievance procedure for settlements in neighbouring areas and other stakeholders in the project.	Benefit: <ul style="list-style-type: none"> Helps to avoid incidents and liability claims 	EBRD PR4, PR2 and PR10 OHS legal framework in Republic of Moldova in the fields of labour, social security, and occupational health and safety	MOLDELECTRICA resources (HR policies, OH&S management system, monitoring reports)	From earliest stages of the project (planning stage / FS) and all along project's lifetime	Legal compliance and avoidance of claims (zero accidents, incidents and complains)	Updating the existing OH&S management system of MOLDELECTRICA if necessary
4.2	Construction works <ul style="list-style-type: none"> OH&S management system put in place by the general contractor, including an OHS Plan during construction Ensure that OH&S requirements are fulfilled and observed; for example, verifying that measures have been taken to control and monitor H&S issues (i.e. measures (i.e. fencing) to discourage public access to the works site, especially at locations close to communities); EPC and subcontractors HR policy to be updated (advertising all jobs locally; encouraging and attracting local workforce to apply for jobs, and prioritising the hire of local workforce where reasonable and practical) Constant, transparent, and effective communication with internal/external stakeholders (PR10) Grievance procedure/mechanism Ensure the functionality of the grievance mechanism; Ensure that grievances are dealt with speedily, effectively and fairly.	Management of risks and impacts on affected stakeholders Benefits: <ul style="list-style-type: none"> Ensure a safe working environment Avoidance/mitigation of incidents and associated liability Improved HR and workforce management Potential local economic small 	Good International Practices OHS statistics	During Construction planning, Operation and Decommissioning it is the responsibility of MOLDELECTRICA During construction works it is the responsibility of the EPC and subcontractors EPC and subcontractors' resources (HR policies, OH&S management	The OHS Plan during construction developed by the General Contractor must be supervised by MOLDELECTRICA		

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4.3	OHL operation <ul style="list-style-type: none"> Occupational Health & Safety Plan During Operation put in place by MOLDELECTRICA or already existing in their internal OH&S management system, including verifying that measures taken to control and monitor H&S issues inside OHL safety corridor (i.e. signage) during, for example, livestock movements and harvest times 	indirect development <ul style="list-style-type: none"> Better relationship with stakeholders (internal/external). 		system, OH&S Plan, monitoring reports			
4.4	Decommissioning (closure and post-closure) = similar with actions during Construction works						
PR5	Land Acquisition, Involuntary Resettlement and Economic Displacement						
5.1	Prepare the documents to have nominated the Project of "national interest"	Compensation measures for land acquisition Strategic Energy Project	PR5 Good international practices	Ministry of Energy MOLDELECTRICA	Prior to starting the construction works, at least 12 months	The compensation process is accelerated	
5.2	Develop the LACF into Land Acquisition and Compensation Plan that include at least: <ul style="list-style-type: none"> cadastral works to identify and value owners and assets replacement or compensation of landfill compensation for economic displacement for land loss compensation for damage crops and land, for livestock death or injury 	Ensure appropriate compensation is paid to the project affected persons Achieve the LACP objectives	PR5 National legislation	MOLDELECTRICA	Prior to starting the construction works	LACP implementation and progress update to EBRD	
5.3	Appoint an independent external consultant to evaluate the land acquisition and compensation process	Failure to assess the process Create tension in local community	PR5 Good international practices	MOLDELECTRICA	Prior starting the construction works	Selection of an independent consultant and approved by EBRD Contract awarded	

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5.4	Recommended to hire local workers, priority for affected people and provide training for them.	Rewards/ bonus for meeting the goals	PR5 Good international practices	PIU for goals EPC contractor and subcontractors for hire workers MOLDELECTRICA	Prior starting the construction works and during works During O&M period	Periodic reports on workforce	
PR6	Biodiversity and Living Natural Resources						
6.1	Obtaining the approval of the Project development in the protected areas, considering that the OHL route will crosses the Padurea Domneasca designated Emerald site, covered by the Bern Convention.	Demonstrate that the Project is legally permitted Assessment of the Project related impacts on the protected areas has been carried out, as required by national legislation The implementation of the Project is consistent with any existing management plans Approval of the Project by Managers of the protected area The Project respects the Bern Convention requirements	PR6, paragraphs 21 and 22 Environmental national legislation (legally permitted)	MOLDELECTRICA PIU/EPC contractor and subcontractors	Prior starting the construction works	The Project is approved by the Manager of the protected area and respects the Bern Convention requirements (including reporting requirement)	
6.2	Recommendations and the mitigation measures of "Biodiversity Impacts Assessment Report" (BIA Report) of the Project should be implemented	Minimal bird disturbance and mortality	PR6	PIU/EPC contractor and subcontractors MOLDELECTRICA	Prior starting the construction works and during construction works During O&M period	Monitoring program Periodic inspection	

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6.3	Developed and implement a Biodiversity Management Plan (BMP), including internal and independent monitoring as is specify in ESMMP and biodiversity mitigation measures. The final BMP has to be approved by EBRD.	Ensure biodiversity mitigation measures are effectively implemented	PR6	PIU/ EPC contractor and subcontractors	Prior starting the construction works and during works	Periodic reports on how BMP works to PIU and EBRD	
6.4	Appoint a biodiversity expert to follow the BMP and how the recommendations of BIA are considered	Improved the biodiversity protection	PR6	PIU/ EPC contractor and subcontractors	Prior starting the construction works and during works	Periodic reports on how BMP works to PIU and EBRD	
6.5	Organise training for workers for wildlife conservation and pollution control	Awareness raising on biodiversity and environment protection	PR6	EPC contractor and subcontractors MOLDELECTRICA	Prior starting the construction works and during works During O&M period	Records of working training provide to PIU and EBRD	
6.6	Develop and implement a Bird Monitoring Program including: <ul style="list-style-type: none"> Monitoring protocols (methodology, timing, frequency, locations, reporting, etc.) Survey during migration and nesting/breeding seasons Six month and annual reports on findings An adaptive management component to inform if there are needed additional or changes in mitigations measures Monitoring process will be completed over the design period (pre-construction), in order to: <ul style="list-style-type: none"> further inform and update the BMP; develop the required Biodiversity Offset Strategy (BOS). 	Bird monitoring	PR6	PIU MOLDELECTRICA with an ornithologist	Agreed with EBRD prior starting construction During construction works During O&M period	Programme implemented Biannual and annual reports to EBRD and in operation to Environmental Agency	
6.7	The development of the Biodiversity Offset Strategy (BOS): <ul style="list-style-type: none"> as a draft report in the year following the interconnection start of operation; as final report, approved by EBRD, two years after start of operation. The BOS must provide a plan to achieve No Net Loss to the Priorities Biodiversity Features identified in the ESIA and any subsequent monitoring and verification	Enhancing biodiversity protection	PR6	MOLDELECTRICA with an ornithologist, as consultant	During O&M period	Document finalisation, including EBRD approval	

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PR7	Indigenous People						
7.1	Not applicable						
PR8	Cultural Heritage						
8.1	Develop and implement Chance Find Procedure, including training for workers how to action in case of finds, procedure and rules for stopping work, securing discovery, notifying authorities, preventing any disturbing or destruction, etc	Ensure that impact on Cultural Heritage assets are identified and mitigated	PR8 National legislation	EPC contractor and subcontractors	Throughout construction works	Documented procedure	
8.2	Appoint qualified archaeologist to conduct an Archaeological Survey to obtain the relevant permit from the National Archaeological Agency	Preservation on cultural heritage and minimizing the risks to archaeological remains	PR8 National legislation	PIU/ EPC contractor and subcontractors	Prior starting the construction works and during works	Documented procedure	
PR10	Information Disclosure and Stakeholder Engagement						
10.1	<p>Construction planning</p> <ul style="list-style-type: none"> Create and implement the SEP and develop an effective system to communicate and work with stakeholders; update SEP whenever necessary Disclose ESIA package and engage stakeholders in compliance with EBRD ESP, 2019 and Republic of Moldova legal framework Public consultation according to EBRD ESP, 2019 and EIA legal framework in Republic of Moldova Be prepared for additional public consultation due to possible ESIA updates, if a detailed review of the Final Design will be required; <p>Grievance Procedure</p> <ul style="list-style-type: none"> Grievance procedure put in place, according to SEP, for an effective communication with potentially affected/vulnerable groups in settlements in neighbouring areas of the OHL route and other stakeholders in the project; Ensure that grievances are dealt with speedily, effectively and fairly. 	<p>Management of risks and impacts on affected communities & businesses, through prevention and mitigation measures</p> <p>Benefits:</p> <ul style="list-style-type: none"> Avoid conflicts and liability claims; costs and time overlaps during pre-construction and construction stages Potential local economic small 	<p>EBRD PR10, PR4 and PR2</p> <p>EIA legal framework in Republic of Moldova</p> <p>International Best Practice</p>	<p>MOLDELECTRICA resources (monitoring reports, grievance mechanism)</p> <p>During Construction planning, Operation and Decommissioning it is the responsibility of MOLDELECTRICA via the ESIA and SEP Manager, acting as the Community Liaison Officer (CLO)</p> <p>During Construction works it is the</p>	<p>From earliest stages of the project (planning stage / FS) and all along project's lifetime</p>	<p>Effective communication with internal/external stakeholders</p> <p>Mutual trust and respect between MOLDELECTRICA and identified stakeholders, in the end enriching stakeholder's expectations</p> <p>No complaints</p>	<p>Continuous stakeholder information and engagement are existing commitments of MOLDELECTRICA via the ESIA and SEP Manager, acting as the Community Liaison Officer (CLO)</p>

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10.2	<p>Construction works</p> <ul style="list-style-type: none"> ▪ Update SEP whenever necessary ▪ Constant transparent communication (information & engagement) process with all internal/external stakeholders of the ESIA information package ▪ Ensure that the EPC and subcontractors are involved in stakeholders' engagement and implement appropriate parts of SEP ▪ Promote locally the EPC and subcontractors updated HR policy and hiring process ▪ Effective functional grievance mechanism. 	<p>indirect development</p> <ul style="list-style-type: none"> ▪ Improved relationship with local stakeholders. 		<p>responsibility of the EPC and subcontractors</p> <p>EPC and subcontractors resources (monitoring reports)</p>			
10.3	<p>OHL operation / Decommissioning (closure and post-closure):</p> <ul style="list-style-type: none"> ▪ Update SEP whenever necessary ▪ Constant transparent communication (information & engagement) process with all internal/external stakeholders <p>Update EPC and subcontractor HR policy</p> <ul style="list-style-type: none"> ▪ advertising all jobs locally, ▪ attracting local workforce to apply for jobs, and ▪ prioritising the hire of local workforce where reasonable and practical. <ul style="list-style-type: none"> ▪ Effective functional grievance mechanism ▪ Monitoring grievances received from workers and external stakeholders, and how they were resolved. 						