

DRAFT ENVIRONMENTAL AND SOCIAL ACTION PLAN

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Good international practice)	Resources , Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
PR1	<b>Assessment and Management of Environmental and Social Impacts and Issues</b>						
1.1	<p>Transgaz will require its Contractors to develop and implement <i>Construction Environmental and Social Management Plans</i> (CESMPs) that build upon the framework CESMPs developed as part of the Supplemental Lenders Information Package (SLIP) for EBRD.</p> <p>Transgaz should include the framework CESMPs in the “Work Statement Documents” which will be agreed with each Contractor per construction Lot.</p>	Compliance with EBRD ESP (2014)	EBRD PR1 Good international practice	<p>Transgaz own resources</p> <p>Transgaz’s EPC Contractors</p>	<p>To be developed during pre-construction phase, or within 60 days after the signing of execution Contract with the BRUA Contractors</p> <p>Implement during entire construction phase</p>	BRUA Contractors’ Construction Environmental and Social Management Plans (CESMPs) to disclosed on Transgaz’s website alongside other SLIP documents	
1.2	<p>Transgaz will develop and implement <i>Environmental and Social Management Plans</i> to manage its EHSS risks and impacts associated with the future operation of the BRUA project (OESMPs).</p>	Compliance with EBRD ESP (2014)	EBRD PR1 Good international practice	<p>Transgaz own resources</p> <p>Transgaz’s EPC Contractors</p>	Prior to Operations, 2019	<p>OESMPs provided to EBRD for review</p> <p>To be disclosed on Transgaz’s website alongside other SLIP documents</p>	

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1.3	<p>Transgaz will prepare a Cumulative Impact Assessment (CIA) study to document potential cumulative impacts to the project area as a result of the BRUA pipeline project.</p> <p>Where appropriate, results of the assessment will be incorporated into the project commitment register, CESMPs/OESMPs.</p>	Compliance with EBRD ESP (2014)	<p>EBRD PR1</p> <p>Good international practice</p>	Transgaz own resources	Prior to construction, 2017	<p>Cumulative Impact Assessment provided to EBRD for review and approval</p> <p>To be disclosed on Transgaz's website alongside other SLIP documents</p>	
1.4	Transgaz will appoint and train a Community Relations Manager (CRM) within its BRUA Project Implementation Unit to manage a team of dedicated Community Liaison Officers (CLOs).	Provide resources and clarify the responsibilities for ensuring consistency and proper management of social / community aspects associated with the Project.	<p>EBRD PR1</p> <p>EBRD PR 10</p> <p>Good international practice</p>	Transgaz own resources	Prior to construction, 2017	Position in place prior to Construction	
1.5	Transgaz will require its Contractors to employ Biodiversity specialists to ensure commitments in the Biodiversity Management Plan, including pre-	Enable efficient management and mitigation of potential	<p>EBRD PR1</p> <p>EBRD PR 6</p>	<p>EPC contractors</p> <p>Transgaz</p>	Prior to construction, 2017	Transgaz and its Biodiversity specialists to monitor Contractor	

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	construction/pre-clearance surveys, are carried out in accordance with project commitments.	construction impacts on biodiversity	Good international practice			capacity on an ongoing basis.  Include requirement for contractors to employ biodiversity specialists in Statement of Works / Job Description	
1.6	Transgaz to clarify with the relevant Romanian environmental authorities whether completing the Strategic Environmental Assessment (SEA) procedure for BRUA (individually or as part of the “Ten Year National Gas Transmission System Development Plan”) is required as per the national permitting requirements.  If required, Transgaz will undertake a SEA process (directly or through the Ministry of Energy, as recommended by the environmental authorities) and disclose the report on its website..	Compliance with national and EU requirements	EBRD PR1  SEA Directive and GD 1076/2004  Good international practice	Transgaz own resources	Clarification to be sought prior to construction, 2017	Confirmation letter from Romanian environmental authority to Transgaz to be provided to EBRD.  If required, SEA prepared and disclosed on Transgaz’s website alongside the SLIP	
1.7	Develop an overarching project commitments register, as part of the BRUA Environmental and Social Management Systems (ESMS) that captures all EHSS	Ensure compliance with national, EU and EBRD	EBRD PR1  Good international	Transgaz own resources	Prior to construction, 2017  Updated as	Commitment register / database that covers pre-construction, construction and	

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	requirements included in the national EIA, and related permit requirements, as well as the SLIP	requirements	practice		required	operation stages of the project to be maintained by BRUA Project Implementation Unit	
<b>PR2</b>	<b>Labour and working conditions</b>						
2.1	<p>Transgaz to carry-out capacity building training/induction for its contractors to ensure that:</p> <ul style="list-style-type: none"> <li>contractors are aware and understand their obligations under national labour laws, PR2, existing contracts and the Labour and Working Conditions Management Plan; and</li> <li>contractors have material capacity to deliver compliance (including management capacity, reporting / data gathering mechanisms, inductions and training for workers, and monitoring of performance).</li> </ul>	Ensure compliance with national, EU and EBRD labour requirements	<p>EBRD PR2 Directive 2014/24/EU on public procurement</p> <p>Good international practice</p>	Transgaz own resources	Prior to construction and repeated when new contractors start working on the project.	<p>Transgaz records of the workshops and evidence of contractors having qualified staff and material capacity to deliver compliance on applicable labour standards.</p> <p>Primary contractors regularly report to Transgaz on labour compliance and management matters.</p>	
2.2	Transgaz to ensure that the primary contractor(s) have an effective grievance mechanism in place that is accessible to all	Provide a clear and transparent framework to	<p>EBRD PR2</p> <p>Good</p>	Transgaz own resources	Prior to construction and continuously	Primary contractors regularly report to Transgaz on complaints	

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	their workers and those of sub-contractors, and ensure that the primary contractor(s) have a policy ensuring responsibility for the dissemination, implementation, monitoring – and oversight – of this/these mechanism(s).	address worker complaints in a timely and effective manner.	international practice		during construction.	received and how they have been handled and resolved.	
<b>PR3</b>	<b>Resource Efficiency and Pollution Prevention and Control</b>						
3.1	Transgaz to undertake additional baseline surveys to define ambient noise conditions near the future GCS facilities.  In case the baseline indicates the risk of exceeding the legal noise limits at the fence line, additional mitigation measures will be implemented and incorporated into CESMPs/OESMPs	Avoid /minimize the disturbances / noise level of local communities	EBRD PR3  Good international practice	Transgaz by certified laboratory  Transgaz & EPC contractor in case mitigation measures are required	Prior to construction, 2017	Where relevant, results of the ambient noise condition to be included in relevant CESMPs/OESMPs	
3.2	Vibration and noise monitoring will be carried out at sensitive receptors/residences within the safety set back area (e.g. houses/structures within the 20 m safety corridor), based on method statements developed by EPC contractors and/or Transgaz directly.	Monitor / avoid /minimize the disturbances / noise level of local communities	EBRD PR3  Good international practice	Transgaz  EPC Contractors	Prior to construction, 2017  With minimum 30 days before starting	Vibration and noise monitoring laboratory results to be included in relevant CESMPs/OESMPs	

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					construction within the safety corridor		
3.3	Develop site specific method statements / Execution Plans for watercourse crossings (e.g. HDD, coffer dam, open cut) that aims to avoid/minimize impacts to the environment during construction.	Avoid /minimize the risks associated to community health & safety	EBRD PR3 EBRD PR6 Good international practice	EPC Contractors and approved by Transgaz	Prior to construction, 2017	Watercourse crossing method statements developed and provided to EBRD for review  To be disclosed on Transgaz's website alongside other SLIP documents	
<b>PR4</b>	<b>Health and Safety</b>						
4.1	A baseline traffic study should be undertaken to gain a better understanding of existing traffic conditions within the project area. This will allow a detailed assessment of impacts on traffic and transportation in the regions along the pipeline route.  The results of the baseline traffic study should feed into EPC Logistic Report(s)	Avoid /minimize the risks associated to community health & safety, traffic and road safety	EBRD PR4 Good international practice	External consultant contracted by Transgaz	Q1 2018	Baseline traffic study in the project area provided to EBRD  To be disclosed on Transgaz's website alongside other SLIP documents	
4.2	The traffic and transportation requirements during construction should be based on a proposed Logistics Report, detailing	Avoid /minimize the risks associated to	EBRD PR4 Good international	Transgaz  EPC	Q1 2018	Logistic Report provided to EBRD	

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	methods of work, detailed programme etc.	community health & safety, traffic and road safety, diseases.	practice	Contractors			
4.3	Develop specific method statements / Execution Plans to address the risks associated with construction of the pipelines within the 20 m safety corridor (including houses located in the corridor)	Avoid /minimize the risks associated to community health & safety	EBRD PR4 Good international practice	Transgaz own resources  EPC Contractors	Prior to construction, 2017	H&S method statements provided to EBRD  To be disclosed on Transgaz's website alongside other SLIP documents	
4.4	Prior to construction, Transgaz will revise the framework Emergency Response Management Plan (ERMP) to clearly identify and document the Project's emergency response notification procedure, including relevant authorities, contact information etc.	Avoid /minimize the risks associated to community health & safety	EBRD PR4 Good international practice	Transgaz own resources	Prior to construction, 2017	Revised ERMP provided to EBRD and disclosed on Transgaz's website alongside other SLIP documents.	
<b>PR5</b>	<b>Land Acquisition, Involuntary Resettlement and Economic Displacement</b>						
5.1	Transgaz to finalise and approve the Land Acquisition and Compensation Internal Procedures (LACIP) and implement the provisions and commitments in the Land Acquisition Framework and Action Plan (LAFAP) in view of developing the final Land	Ensure EBRD PR5 requirements are met during the Project land acquisition process.	EBRD PR5 Good international practice	Transgaz with the support of an external consultant	LACIP and LAFAP to be finalized prior to disclosure.  LAP to be final and disclosed before	LACIP and LAFAP approved by EBRD and publically disclosed  LAP approved by EBRD and disclosed prior to	

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	Acquisition Plan (LAP) and Guide to Land Acquisition and Compensation (GLAC).	Minimize impacts on livelihoods associated with BRUA Project.			Board approval.  GLAC to be final and disclosed a minimum of 45 days before construction	Board.  GLAC approved by EBRD and disclosed a minimum of 45 days prior to first construction start.	
5.2	Transgaz to sign a new protocol or amendment to the existing agreement with the ANCPI (National Cadaster Agency) to ensure the accelerated registration of all affected land plots in the Land Book (cadaster) and define joint measures to support this effort.	Ensure EBRD PR5 requirements are met during the Project land acquisition process.  Maximise affected land owners' access to compensation payments for temporary land occupation.	EBRD PR5  Good international practice	Transgaz with the cooperation of the ANCPI	Prior to Board approval	Transgaz to initiate discussions with the representatives of each AUs to ensure that they initiate the land registration process.  New protocol or amendment signed with the ANCPI and implemented.	
5.3	Transgaz to ensure that appropriate and concrete assistance measures for vulnerable people are included in the final LAP and GLAC in order to maximize timely access to information, indemnities and/or crop	Ensure support and protection of vulnerable people during land acquisition	EBRD PR5  Good international practice	Transgaz with the support of an external consultant	Measures defined in the LAP prior to Board approval.  Measures implemented	Measures to support vulnerable people included in the final LAP	



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	compensation, as well as to the means to submit grievances.	and compensation process .			during the land acquisition process.		
<b>PR6</b>	<b>Biodiversity and Living Natural Resources</b>						
6.1	Transgaz and its biodiversity specialists to develop an induction training programme to train all Contractors' to ensure that key commitments included in the Biodiversity Management Plan (BMP), Biodiversity Action Plan (BAP), national EIA and Supplemental EIA are implemented in the field.	Enable efficient management and mitigation of potential construction impacts on biodiversity	EBRD PR 6 EU Habitats Directive  Good international practice	Transgaz  External Biodiversity experts	Prior to construction, 2017	Formal training programme developed	
6.2	Transgaz to ensure that its Contractors' biodiversity specialists perform pre-construction surveys prior to Right-of-Way clearing to confirm the adequacy of proposed mitigation measures identified in the Supplemental EIA Report, BMP and Biodiversity Action Plan.	Enable efficient management and mitigation of potential construction impacts on biodiversity	EBRD PR 6 EU Habitats Directive  Good international practice	Transgaz  External Biodiversity experts  EPC	At least 2 weeks prior to vegetation clearing within the right-of-way / project area	Survey results to be documented in Preconstruction Survey Reports, and where relevant, incorporated into Project Commitment Register	

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	Where relevant, proposed mitigation measures will be updated, included in site specific method statements/project commitment register and implemented by the Contractors.			contractors			
6.3	Transgaz and its biodiversity specialists will develop, and update as necessary, a Biodiversity Action Plan (BAP) that builds upon the Framework BAP included in the Supplemental Environmental Impact Assessment Report (Chapter 12) to avoid, minimize and/or mitigate impacts to species and habitats of conservation importance.	Mitigation and management of potential construction/operations related impacts on biodiversity	EBRD PR 6 Good international practice	Transgaz EPC contractors External Biodiversity consultants	Prior to construction, 2017	BAP provided to EBRD for review disclosed on Transgaz's website alongside other SLIP documents	
6.4	Transgaz will develop a Biodiversity Offset Management Plan (BOMP) that builds upon the strategies presented in the Supplemental Environmental Impact Assessment Report (Chapter 12) to achieve No Net Loss of Priority Biodiversity Features and Net Gain of Critical Habitats, in line with Romanian and EBRD requirements	Mitigation and management of potential construction/operations related impacts on biodiversity	EBRD PR 6 Good international practice	Transgaz; External Biodiversity consultants	2020	BOMP provided to EBRD for review and approval and disclosed on Transgaz's website alongside other SLIP documents	

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<b>PR8</b>	<b>Cultural Heritage</b>						
8.1	Develop site specific method statements / Execution Plans to be developed by Transgaz and its Contractors for construction works near Tibiscum and Ulpia Traiana Sarmizegetusa heritage sites.	Ensure compliance with national and international standards	EBRD PR8  Good international practice	Transgaz own resources  EPC contractors	Prior to construction, 2017	Site Specific Execution Plan / Method Statements in place for Tibiscum and Ulpia Traiana Sarmizegetusa and provided to EBRD for review  To be disclosed on Transgaz's website alongside other SLIP documents	
<b>PR 10</b>	<b>Information Disclosure and Stakeholder Engagement</b>						
10.1	Implement and update annually the Stakeholder Engagement Plan and Grievance Mechanism and establish a Stakeholder Engagement and Grievance Log / Database to record all stakeholder engagement activities and grievances received related to the BRUA Project.	Ensure appropriate tracking of stakeholder engagement activities	EBRD PR10  Good international practice	Transgaz own resources	Prior to SLIP Disclosure.  As required going forward	Stakeholder Engagement Log in place  Consultation process and grievances addressed by Transgaz and its contractors as evidenced by quarterly stakeholder engagement reports to EBRD.	
10.2	Trangaz to develop a dedicated section on its website to disclose relevant	Ensure stakeholders	EBRD PR10	Transgaz own	120 Days prior to EBRD Board	Dedicated BRUA section on the Company website	

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	environmental and social impact assessment reports and management plans, including the SLIP, to the public and project affected people (PAPs).	access to relevant environmental and social information on BRUA Project	Good international practice	resources	Approval	with all relevant E&S information/studies posted	