



Document title: WATER RESOURCES MANAGEMENT PLAN

Document number: 1062-TGN-MNG-PLN-PJM-22-00007

Project: THE DEVELOPMENT OF THE ROMANIAN GAS TRANSMISSION

SYSTEM ALONG BULGARIA-ROMANIA-HUNGARY-AUSTRIA ROUTE, PODISOR – GMS HORIA AND 3 NEW COMPRESSOR

STATIONS (JUPA, BIBESTI AND PODISOR) (PHASE 1)

(REFERENCE NUMBER IN EU LIST: 6.24.2)

Revision	Date	Issued by	Checked by	Endorsed by	Approved by
Rev 2	20.03.2017	Preda Cosmin Expert PMU BRUA	Iulian Butnaru BRUA HSE Project manager	Paul Popescu BRUA Project Manager PMU	Ion Sterian Director General SNTGN Transgaz SA
			Alexandru Simionescu BRUA Execution Project manager	Sorin Keszeg BRUA Project Manager Services	

<u>Disclaimer:</u> The sole responsibility for this publication lies with the author. The European Union and the Innovation & Networks Executive Agency (I.N.E.A.) are not responsible for any use that may be made of the information contained herein.

Table of Contents

Αl	bbrevia	tions	3
1	Intr	oduction	4
	1.1	Overview	4
	1.2	Purpose of this Water Resources CESMP	4
	1.3	Scope of the Water Resources Management CESMP	4
	1.4	Document Management	4
2	The	BRUA Project	5
	2.1	Project Overview	5
	2.2	Environmental and Social Commitments	5
	2.3	Project Approach to Water Management	6
3	Key	Policies, Legislation and Standards	8
	3.1	Overview	8
	3.2	Company Policies	8
	3.3	National Legislation and Permits	8
	3.4	International Standards and Commitments	8
4	Link	ages to other Elements of the Transgaz HSE-MS	9
	4.1	Overview	9
	4.2	Linkages to Other CESMPs	9
5	Key	Roles and Responsibilities	11
	5.1	Overview	11
	5.2	Company Roles & Responsibilities	11
	5.3	Contractor Roles & Responsibilities	12
6	Mai	nagement, Mitigation, Monitoring and Verification	14
	6.1	Management Actions	14
	6.2	General Monitoring Activities	14
	6.3	Management System Verification Monitoring	15
	6.4	Key Performance Indicators	15
	6.5	Training	17
7	App	endices	18
	7.1	Appendix 1: Mitigation Measures & Management Actions	18
	7.2	Appendix 2: Monitoring Requirements	21
	7.3	Appendix 3: Relevant Legislation	22

Abbreviations

Abbreviations	Description	
BRUA	Bulgarian-Romanian-Hungarian-Austrian	
CESMP	Construction Environmental and Social Management Plan	
EIA	Environmental Impact Assessment	
ESMP	Environmental and Social Management Plan	
F-CESMP	Project Framework Construction Environmental and Social Management Plan	
GIP	Good Industry Practice	
HDD	Horizontal Directional Drilling	
HSE	Health, Safety and Environment	
HSE-MS	Health, Safety and Environment Management System	
HSES	Health, Safety, Environment System	
HSSE	Health, Safety, Social and Environment	
JOCE	Official Journal of European Community	
KPI	Key Performance Indicators	
PMU	Project Management Unit	
PR	Performance Requirement	

1 Introduction

1.1 Overview

The Construction Environmental and Social Management Plans (CESMP) defines the actions and measures necessary for the overall management of environment and social impacts for both the Project beneficiary (TRANSGAZ S.A., represented by the Bulgarian-Romanian-Hungarian-Austrian Project Management Unit (BRUA PMU)) and contractors in line with the applicable law and other obligations. The CESMPs are comprised of a suite of management plans.

This CESMP is the Project Water Resources Management Plan, document no 1062-TGN-MNG-PLN-PJM-22-00007.

Project construction activities will generate a demand on water resources and the production of wastewater, which may have the potential to result in negative impacts on the water environment and users of water resources. This includes accidental discharges of pollutants to watercourses. The Project therefore seeks to proactively manage such potential pollution sources and the use of water.

1.2 Purpose of this Water Resources CESMP

Project construction activities in relation to water use can result in negative impacts upon the water environment and users. This CESMP therefore:

- Outlines the key policies, legislation and standards relating to waste management;
- Defines roles and responsibilities:
- Outlines actions and measures necessary for the effective management of water resources;
- Covers both accidental and intended impacts on the water environment;
- Details specific control measures to be implemented by the Company and its contractors (and subcontractors);
- Incorporates the requirements of the Regulatory EIA findings, Supplemental Environmental Assessment (June 2017), international standards, Romanian legislation, Lenders requirements and Project-specific construction permits.
- Considers the Company's general approach to water management procedures and methodologies.

In doing so, this CESMP defines the actions and measures necessary for the overall management of water by the Project beneficiary (TRANSGAZ S.A., represented by BRUA PMU), Contractors and subcontractors, in line with the applicable laws and other obligations.

1.3 Scope of the Water Resources Management CESMP

This CESMP covers all water management activities throughout the Project construction phase and is applicable to all Transgaz staff, Contractors and Sub-contractors. Whilst this Water Resources Management CESMP will act as a 'framework' to determine what the Contractors will be expected to produce, Contractors are required to ensure that all requirements of the Water Resources Management CESMP are adopted within their own management plans. Further information on Roles and Responsibilities is provided in Section 5 of this CESMP.

1.4 Document Management

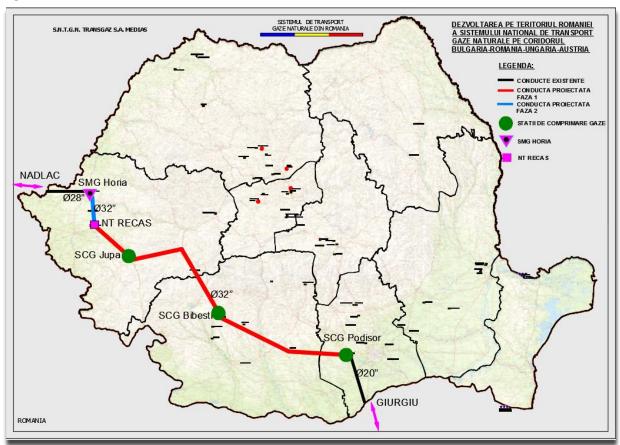
This Plan will be managed and controlled by the Document Control and Archiving Compartment within BRUA PMU. The methods for document management and improvement during the construction phase will be described in the Document Guide to be developed by BRUA PMU.

2 The BRUA Project

2.1 Project Overview

SNTGN Transgaz SA Medias ("Transgaz", "the Company" or "the Beneficiary"), the licensed operator of the Romanian National Gas Transmission System, is developing a 529km natural gas pipeline between Podisor in southern Romania and Horia in the west of the country (the "Project"). The pipeline, which for much of the route will be buried and will upgrade or run alongside existing pipelines, represents the Romanian section of the BRUA Natural Gas Transmission Corridor. In addition to the pipeline itself, the Project will also require construction of three new Gas Compressor Stations (GCS) at Podisor, Bibesti and Jupa, as well as a range of supporting infrastructure including block valve stations, construction camps, pipe storage areas, watercourses and infrastructure crossings and access roads.

Figure 2.1 BRUA Route



Whilst the majority of the route is on land currently used for farming, it does pass through a number of specifically sensitive areas, including seven Natura 2000 Sites, and the nationally important Dinosaurs Geo-Park. It also passes close to a number of sites of archaeological value including the ancient city of Tibiscum near Jupa. In some of these areas, as well as near major roads and railways and for the 8 major rivers, this will involve the use of horizontal directional drilling. In other mountainous areas special "hammering techniques" may also be applied.

2.2 Environmental and Social Commitments

The Project is subject to various environmental and social requirements that are managed by the Company through the implementation of its Health, Safety and Environmental Management System

(HSE-MS)¹. This HSE-MS includes a specific Project Framework Construction Environmental and Social Management Plan (F-CESMP) as well as associated topic/activity specific CESMPs. Operational phase Environmental and Social Management Plans will be developed at a later stage prior to BRUA operation. The overall approach to the integration of the above documents is described in Section 4.2 of the F-CESMP document.

2.3 Project Approach to Water Management

The following outlines the proposed approach for the provision and management of water supply and management of potential risks and impacts to the water environment during the Project construction phase.

River Water Quality

The BRUA project crosses watercourses described by water qualitative parameters as moderate to very good.

Water supply

The water supply network and resource availability in the vicinity of the BRUA area of influence has undergone expansion. During construction the solution is to provide potable water at the five construction camps and 10 pipe storage sites in polyethylene containers. For hydro-testing and dust suppression by tankers from local water utility companies remains the most suitable option. No water will be abstracted directly from surface water courses or groundwater sources during construction.

Wastewater management

The expected / potential sources of wastewater are described briefly in Table 2.2 below

Table 2.2 Sources of Wastewater

Stage	Source of wastewater
Construction	 5x construction camps (including workers accommodation) domestic/sanitary wastewater 10x P pipeline storage depots domestic/sanitary wastewater. Hydro-test water Surface run-off containing suspended sediments or contaminants
	 De-watering effluent (if dewatering is required) Wastewater from the Horizontal Directional Drilling (HDD)/Horizontal Drilling (HD) process

The wastewater effluent following hydro-testing will be removed from site in tankers to a waste water treatment plant.

_

¹ Integrated Management Manual Quality-Environment-Occupational Health and Safety, code MSMI-CMSSO Ed. 03/Rev.

Domestic/sanitary wastewater and chemical toilet waste will be collected by specialist waste contractors and taken for treatment and disposal.

Run-off will be managed initially through a drainage system that will incorporate oil separators. The water will then pass into a soakaway (or grassy polder) that will act to gradually filter the water and capture contaminants.

3 Key Policies, Legislation and Standards

3.1 Overview

The Project is subject to a range of policies, legal and regulatory requirements and other applicable standards and technical requirements of relevance to this CESMP. Where two or more of the identified standards are inconsistent or contradictory, unless otherwise justified, the Project will adopt the more stringent.

3.2 Company Policies

Transgaz's *Health Safety and Environment policy* (as outlined in the Integrated Management Manual Quality-Environment-Occupational Health and Safety, code MSMI-CMSSO Ed. 03/Rev.) and *Corporate Social Responsibility policy* apply to all activities carried out by, or on behalf of, the Company as part of this Project. Details of these policies are provided in Section 7.3 of the F-CESMP.

3.3 National Legislation and Permits

All contractors are also required to comply with all relevant national regulatory requirements. Whilst contractors are required to verify the latest regulatory requirements themselves an indicative list of Romanian national legislation is provided in Appendix 3.

Contactors must also ensure that relevant requirements of the various construction-related permits for the Project issued by national (and local) regulators are addressed. Any requirements arising from the revision/amendment of those permits will also be applied. Key permits are summarized in Section 3.2 of the F-CESMP.

3.4 International Standards and Commitments

A range of international standards and commitments are applicable to this CESMP as described in Section 3.3 of the F-CESMP Document. These include the European Bank of Reconstruction and Development (EBRD) Environmental and Social Performance Requirements (PRs), with <u>PR3</u> and <u>PR6</u> especially relevant to this document. All contractors are required to comply with all such requirements as they apply to their activities. The following European Union Directives are relevant to this CESMP and have been taken into account:

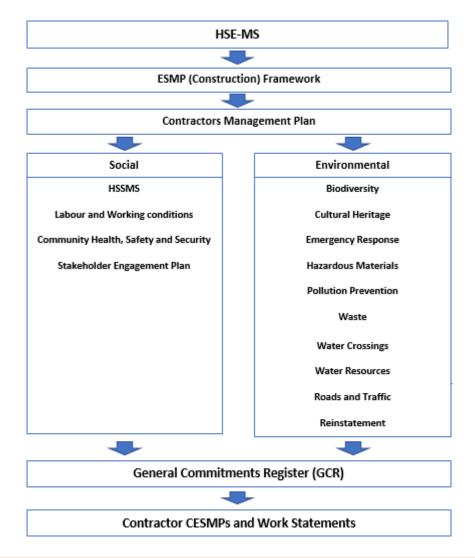
- Directive 2000/60/EC Water Framework Directive;
- Directive 2008/105/EC on environmental quality standards in the field of water policy, amending and subsequently repealing Council Directives 82/176/EEC, 83/513/EEC, 84/156/EEC, 84/491/EEC, 86/280/EEC and amending Directive 2000/60/EC of the European Parliament and of the Council.

4 Linkages to other Elements of the Transgaz HSE-MS

4.1 Overview

This CESMPs forms part of the Project HSE-MS as described in the F-CESMP. Where relevant the CESMP should be read in conjunction with other HSES-MS elements including the ESMP source documentation, control documentation and the key HSE-MS documentation. These are described further in Section 4.1 of the F-CESMP and illustrated in Figure 4.1 below:

Figure 4.1 Links to other HSE-MS Documentation



4.2 Linkages to Other CESMPs

A listing of the CESMPs and their document numbers is presented in Section 4.2 of the F-CESMP Document. The other CESMPs considered to be of particular relevance to this Water Management CESMP are as follows:

- Biodiversity CESMP, Document No. 1062-TGN-MNG-PLN-PJM-22-00006
- Water Crossings Management CESMP, Document No. 1062-TGN-MNG-PLN-PJM-22-00008
- Pollution Prevention CESMP, Document No. 1062-TGN-MNG-PLN-PJM-22-00003
- Roads and Traffic CESMP, Document No. 1062-TGN-MNG-PLN-PJM-22-00012
- Reinstatement CESMP, Document No. 1062-TGN-MNG-PLN-PJM-22-00014

- Emergency Response CESMP, Document No. 1062-TGN-MNG-PLN-PJM-22-00015
- Stakeholder Engagement Plan, Document No. 1062-TGN-MNG-PLN-PJM-22-00016
- Waste Management Plan, Document No. 1062-TGN-MNG-PLN-PJM-22-00005
- Community Health Safety and Security Management Plan, Document No. 1062-TGN-MNG-PLN-PJM-22-00011
- Hazardous Materials CESMP, Document No. 1062-TGN-MNG-PLN-PJM-22-00004

5 Key Roles and Responsibilities

5.1 Overview

An integrated approach to water management involves a range of stakeholders, including the Company, the Contractors (and subcontractors), local authorities, regulatory agencies and the general public. Effective water management therefore requires robust processes regarding information dissemination, training, and designation of responsibility, management actions, monitoring, control, and remedial actions.

Roles and responsibilities for the Company and Contractors are detailed below. Further information on specific responsibilities for CESMP actions outlined in Appendix 1 and Appendix 2.

5.2 Company Roles & Responsibilities

Transgaz HSE management roles and responsibilities during the Project construction phase are detailed in the BRUA PMU "Control system, safety and environmental protection Guidelines". Further information is also provided in other documents listed in the F-CESMP document.

With regards to this CESMP, Transgaz S.A. is responsible for key management activities including:

- Development of bidding conditions regarding water management;
- Professional training of a Transgaz water management representative on site;
- Monitoring contractor performance, supervision and control of contractors:
- Management cooperation in case of an ecologic accident² (including registration and communication of events); and
- Management of Transgaz's own impacts upon the water environment.

Specific roles and responsibilities within the Company the following roles and responsibilities will apply presented in Table 5.2 will apply.

Table 5.2 Company Roles and Responsibilities

Position	Responsibilities
Director general SNTGN TRANSGAZ SA	- Approves the Water CESMP
BRUA – Execution Manager BRUA – HSSE Manager	 Ensures compliance with the requirements set out in this Plan; Has overall responsibility for implementation of this Water CESMP, including by the Contractors; Develops, monitors and revises this plan, according to changes in the legislation or other requirements emerging; Ensures the necessary training for BRUA PMU staff on water management is delivered; Centralizes the information related to the management of water and wastewater by the Contractors;

² Ecologic accident – an event resulting from an unforeseen and accidental spillage or emission of a hazardous or polluting substance (whether liquid, solid, gasseous or vapour) that could result in detrimental impacts to the environment and/or local communities

	,
	 Provides the support necessary for contractors to comply with the Water CESMP; Ensures that the plan is available to all BRUA PMU employees and contractors; Performs regular audits of contractors performance to monitor compliance against the requirements of this Plan; Monitors and reports all risks, non-compliances with this Plan and incidents relating to water management and reports them to the company management; Manages the water quality monitoring that will be performed by laboratories approved by RENAR; and Prepares an annual environmental report that includes water management details.
Environmental responsible on site of Transgaz from PMU BRUA	Will verify the implementation of contractors' obligations including regular audits of:
	 The quality of water for domestic consumption, in accordance with the requirements of Romanian legislation. Compliance with the provisions of Romanian legislation with regard to the discharge of wastewaters.

5.3 Contractor Roles & Responsibilities

Overarching Contractor HSSE requirements are defined in the relevant articles of their contracts and associated mandatory annexes. Each contractor must also implement all relevant requirements of the CESMPs, including this Water CESMP. Contactors are also responsible for ensuring that any subcontracted work meets these requirements. In addition, within the Project, responsibility for water management lies with the Contractors according to the principle "polluter pays".

Contractors will therefore be required to present to the Beneficiary, represented in the Project by BRUA PMU in accordance with the requirements, their proposed approaches to:

- Management of water on site.
- Spill recovery and emergency response to an event located within close proximity to a water resource
- Any other conditions outlined in this CESMP or its Appendices.

In addition contractors will present the Beneficiary with details of:

- A nominated representative on water management;
- Records of any impacts associated with water management.

Further specific responsibilities of the contractors/sub-contractors are outlined in the Appendix1 and Appendix 2 to this CESMP and in Table 5.3 below.

Table 5.3 Contractor Roles and Responsibilities

Position	Responsibilities
Contractor/Subcontractor Environmental responsible	 Ensures that all activities are carried out in accordance with the requirements of this Water CESMP; Produces a Water Management Plan in line with this Plan. Complies strictly with the requirements imposed by the Technical Project; Performs regular inspections at working sites, to ensure all activities are being performed in accordance with the requirements of the Water CESMP; Keeps records of water use and reports on water according to the requirements of any relevant legislation Ensures all staff receive the necessary training in relation to water management; Ensures contracts are in place with legally certified companies for the collection and proper treatment of all categories of wastewater; Ensures all subcontractor activities are conducted in line with this Water CESMP. Produce monthly and annual environmental reports that include details on water management that must be sent to Transgaz. Reports on all risks, non-compliances with this Plan and incidents Ensures all necessary measures are taken to remedy any non-compliances

6 Management, Mitigation, Monitoring and Verification

6.1 Management Actions

A range of management actions (and other mitigation measures) are required to be implemented in respect of water management. The specific management actions and mitigation measures required of Transgaz staff and its Contractors (and sub-contractors) are described in Appendix 1 to this CESMP. These should incorporate Good Industry Practice (GIP³) in relation to the discharge of water from excavations, prevention of silt pollution and reduction of pollution risk, including the following measures:

- Preventing water from entering excavations, by using cut-off ditches;
- Using pump sumps in excavations;
- Minimising the disturbance of standing water;
- Minimising the amount of time stripped ground and soil stockpiles are exposed;
- Only removing vegetation from the area that needs to be exposed in the near future;
- Managing stockpiles to avoid sediment run-off;
- Using geotextile silt fencing at the toe of the slope, to reduce the movement of silt;
- Collecting run-off in soakaways (referred to as polders in the translation of the Regulatory EIA) and allow suspended solids to settle before disposal;
- Diverting clean water away from the area of construction work in order to minimise the volume of contaminated water:
- Equipment and vehicle wheel washing to be carried out in a designated area of hard standing locacted away from any watercourse or surface water drain;
- Discharge of treated water to the environment with formal approval from the relevant regulator;
- Contaminated water tankered off site for authorised disposal.

6.2 General Monitoring Activities

Monitoring provisions for this Water Management CESMP have been developed through the process outlined in Table 6.2:

Table 6.2 Approach to Monitoring

Objective	Approach
1: Risk Based	Monitoring programs to address material issues based on the use of the 'source-pathway-receptor' approach in the Environmental Impact Assessment. These are commensurate with:
	 the scale and nature of the activity, the assessed potential level of impact (and uncertainty thereof), and the sensitivity of the local environment within the activity area of influence
2: Compliance Based	Additional monitoring programs to meet specific regulatory needs.

Following this approach the proposed monitoring plans should meet both Transgaz' requirement to understand and manage the Project's potential impacts for each construction activity/ location and any specific requirements of the Romanian authorities. The specific monitoring requirements for this Water CESMP are presented in Appendix 2.

_

³ For example, Guidance for Pollution Prevention Works and maintenance in or near water: GPP 5, January 2017

6.3 Management System Verification Monitoring

Management System verification monitoring requirements, as detailed in the F-CESMP Document, are divided into three levels as shown in Table 6.3.

Table 6. 3 Auditing management system

Tier	Objective	Responsible	Description
Tier 1:	Transgaz management system audits.	Transgaz	These audits are aimed at assessing the Transgaz HSES management system elements and assessing their continued suitability throughout the project life cycle.
Tier 2:	Transgaz CESMP audits.	Transgaz	These audits are undertaken by the Transgaz BRUA team to confirm compliance by the Company and its contractors with the CESMPs.
Tier 3:	r 3: Contractor Self-audits. Contractor Cont		These audits are to be undertaken by contractors to confirm compliance by themselves and their subcontractors with the CESMPs and their own HSE management systems. The managing contractors shall ensure that audit reports are provided to Transgaz

In addition to the above, there are also expected to be regulatory audits and lender compliance monitoring visits. The nature and structure of these will be confirmed with regulators and lenders.

6.4 Key Performance Indicators

Both the General Monitoring and the Management System Verification Processes require robust Key Performance Indicators (KPI) to be developed. These are quantitative or qualitative measurements used to gauge performance over time and can be used to assess the effectiveness of control measures. The KPIs considered relevant to this Water CESMP are shown in Table 6.4 below.

Table 6. 4 Key Performance Indicators for Project Water Resources Management

ID	KPI	Target	Monitoring Measure	Associated Management Actions
KPI-001	Number of reported non-compliances with the requirements of this CESMP	Zero per month	N/A	All actions identified in Appendix 1
KPI-002	Number of non- compliances closed due to corrective actions being taken within the defined timeframe (set on a case by case basis)	100% of all non- conformities remedied within the defined timeframe.	N/A	All actions identified in Appendix 1
KPI-003	Number of reports of near misses reviewed for root cause and a corrective action identified and shared across all spreads within 48 hours to prevent future occurrence	100% of near miss reports reviewed and shared	N/A	N/A
KPI-004	% of all staff who have received relevant and adequate training	100% compliance with training requirements.	WM1	N/A
KPI-005	Number of incidents of water pollution	Zero per month	WM3	WM 002 WM 007 WM 012 WM 013 WM 014 WM 016 WM 017 WM 019 WM 020
KPI-006	Volume of water consumed	Maintain or reduce water consumption on a 6 monthly basis	WM2	WM 009 WM 010

The specific auditing and monitoring requirements for the verification of each of the management actions described within this Water CESMP (Appendix 1) are identified in Appendices 1 and 2. This includes identification of the relevant audit tier level (1 to 3) to be undertaken.

6.5 Training

Training needs for all TRANSGAZ and Contractor staff shall be identified at the outset, before construction works commence, and a training plan developed.

7 Appendices

7.1 Appendix 1: Mitigation Measures & Management Actions

Ref	Topic	Location	Requirement	Responsibility	Verification Process
WM 001	Water Management	Ali	All requirements in the Environmental Agreement in relation to water management must be met	Contractor	Cross check the requirements of the Environmental Agreement
WM 002	Water Management	All	Any relevant requirements in the Pollution Prevention CESMP associated with water management should be put in place.	Contractor	Cross check the requirements of the PPMP
WM 003	Traffic Access	All Watercourses	*The construction traffic will cross watercourses via existing bridges and existing roads.	Contractor	Visual Inspections
WM 004	Sensitive Areas	All Watercourses	Implement Special Method statements for construction and reinstatement at special/sensitive areas, in accordance with permits obtained from Romanian Waters, in locations identified in the Plan of Biodiversity in close contact with the water.	Contractor	Visual inspection against requirements of the method statements.
WM 005	Site Drainage	Construction sites	*Accomplish a drainage system around the site able to receive the rain water volumes, communicating with soakaways and silt and hydrocarbon traps.	Contractor	Visual Inspections
WM 006	Construction Activities	All Watercourses	Any construction activities not associated with water crossing points that have the potential to destabilize the watercourse (including irrigation canals) banks will not be undertaken within 50m of a watercourse.	Contractor	Visual Inspections

WM 007	Construction Activities	All Watercourses	Demarcation and offsets for camp and storage locations and field activities will be at least 50m from watercourses where possible.	Contractor	Visual Inspections
WM 008	Standing Water	All sites	*Access roads, the working corridor, work sites, and pipe warehouses will be maintained to avoid the development of areas of standing water.	Contractor	Visual Inspections
WM 009	Water Consumption	All Sites	Water conservation initiatives will also be undertaken with the aim to limit the water consumption during the construction activities, like the water use for mitigation of dust suspension (e.g. by means of specific staff training to a rational use of water, commensurate with the actual needs)	Contractor	Records of water consumption
WM 010	Water Consumption	All Sites	Water conservation initiatives will be undertaken with the aim of limiting potable water consumption (e.g. by means of specific staff training to a rational use of water resource).	Contractor	Records of potable water consumption
WM 011	Pollution Prevention	All Sites	*All working areas to have appropriate ecological toilets to be emptied by authorized operators	Contractor	Visual Inspections. Audit of relevant paperwork for toilet waste collection and transfer
WM 012	Pollution Prevention	All Waterbodies	Wastewater should be prevented from entering surface water bodies directly, unless prior assessment has determined it is safe or any necessary treatment has been undertaken	Contractor	Visual inspection, records of wastewater treatment
WM 013	Pollution Prevention	All Sites	Ensure contaminated water from dewatering or cement washing operations is treated prior to discharge, depending on the nature of the contaminants.	Contractor	Visual inspection, records of wastewater treatment

WM 014	Site Drainage	All Sites	*Create a series of small soakaways to reduce erosion and associated turbidity arising from surface water run-off in accordance with the requirements of the Environmental Agreement4. This states that they should be at approximately 30-50m intervals, up to 10m2 in area and a maximum depth of 30cm.	Contractor	Visual Inspections
WM 015	Pollution Prevention	All Sites	Domestic wastewater is to be separated from hazardous oily water discharges at all sites Contractor		Visual inspections
WM 016	Pollution Prevention	All Sites	*Contractors will develop and implement an appropriate plan to prevent accidental water pollution based on the BRUA commitments requirements. Contractor		Review and approval of Plan
WM 017	Flooding	All Sites	*Monitoring the meteorological bulletins meant to take the equipment outside the areas which could be flooded, in case of high waters	Contractor	Records of bulletins consulted.
WM 018	Wastewater Management	All Sites	*Wastewaters will be collected, stored and treated adequately (depending on the nature of the contaminants) to prevent any adverse impact on water quality	Contractor	Audit of records of wastewater collection, storage and treatment.
WM 019	Pollution Prevention	All Sites	*All equipment should be brought onto site in a perfect state of operation and having already undergone an oil change	Contractor	Visual Inspections and audit of equipment service records.

Commitment from the Environmental Permit

⁴ Accomplish polders of small dimensions having a sediment exclusion role, respectively for stilling the leaking force of pluvial waters, to be accomplished along the access ways at distances of approximately 30-50m. The development of polders shall be accomplished on surfaces of up to 10 sq m and at a maximum depth of 30 cm, being provided with diffuse leaking areas, in steps oriented upstream, in order to avoid the occurrence of erosive phenomena, at distances of 2-3 m to the access ways, being used as accumulation areas (aggregation) of the species of amphibians and not only, outside the areas having a potential for negative impact (access ways).

7.2 Appendix 2: Monitoring Requirements

ID	Activity	Description	Parameters	Location	Standards	Frequency	Tier (1/2/3)
WM1	Training	Audit of records to demonstrate all contractor/sub- contractor staff have received the relevant training	Evidence of training provided.	All construction camps/sites and storage depots	Level of training required	Tier 2 – bi-annual Tier 3 - quarterly	2 & 3
WM2	Water Consumption	Audit of water use records (by activity i.e. dust suppression, hydrotesting, domestic use) to ensure they have been completed accurately.	 Evidence that water use records have been completed Volumes of water consumed 	All construction camps/sites and storage depots	Records completed as required	Tier 2 – bi-annual Tier 3 - quarterly	2 & 3
WM3	Water Management	Audit of any water management failures	Incidents of water pollution (surface or groundwater)	All construction camps/sites and storage depots	Incident reports	Tier 2 – bi-annual Tier 3 - quarterly	2 & 3
WM4	Wastewater Management	Audit of final destination/treatment of wastewater generated	Evidence that wastewater effluent was correctly collected / transported / treated / discharged by a licensed operator.	All construction camps/sites and storage depots	Required standards of wastewater collection, transport, treatment and discharge.	Tier 2 - Bi-annual	2
WM5	Water Quality	Audit of water quality monitoring records	Evidence that appropriate water quality parameters were measured and recorded.	Rivers as directed by the Biodiversity Specialist	Required levels of appropriate water quality parameters	Tier 2 – bi-annual Tier 3 - quarterly	2 & 3

7.3 Appendix 3: Relevant Legislation

Ref	Legislation
LAW no.107_199	Water Law, as amended and supplemented.
Order no. 278_1997	The methodology framework for developing plans to prevent and combat accidental pollution.
H. G. no. 53_2009	The national plan for the protection of groundwater against pollution and deterioration.