

Montenegro: Main Roads Reconstruction Project, M-2 Tivat-Jaz Road Section

Framework Construction
Environmental and Social
Management Plan (FW C-ESMP)

Prepared for: European Bank of
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List of Acronyms

| Acronym | Explanation |
|---------------|--|
| CHA | Critical Habitat Assessment |
| EBRD | European Bank of Reconstruction and Development |
| EIA | Environmental Impact Assessment |
| ESAP | Environmental and Social Action Plan |
| ESIA | Environmental and Social Impact Assessment |
| EU | European Union |
| GIP | Good International Practice |
| HGV | Heavy Goods Vehicle |
| LARP | Land Acquisition and Resettlement Plan |
| NEPA | Nature and Environment Protection Agency |
| PAA | Project Affected Area |
| PAP | Project Affected People |
| PBF | Priority Biodiversity Features |
| SEP | Stakeholder Engagement Plan |
| SPM | Spatial Plan of Montenegro |
| TA | Transport Administration (TA) of Montenegro |
| TMP | Traffic Management Plan |
| UNESCO | United Nations Educational, Scientific and Cultural Organization |

1 Introduction

1.1 Document Scope and Purpose

This document is the **Framework Construction Environmental and Social Management Plan** (Framework C-ESMP or FW C-ESMP) for the Montenegro Main Road Reconstruction Project; Rehabilitation and upgrade of the Tivat - Jaz road section (henceforth the "Project"). It provides an overarching framework for avoiding, minimising and managing potential environmental and social risks and impacts during the construction phase of the Project.

The document is intended to help ensure that the Project complies with all relevant project commitment standards and requirements. As such, it outlines the generic approach (and control processes) to be implemented, by both the:

Transport Administration (TA) (when delivering the commitments that are the responsibility of the TA, as compiled in the Project Commitments Register (PCR – see Section 7 of this document); and supervising and monitoring the Construction Contractors' environmental and social performance.

Construction Contractors and subcontractors when delivering the commitments that are their responsibility, also compiled in the PCR.

This Framework C-ESMP also provides general guidance to the Construction Contractors on the development and implementation of their own Construction Environmental and Social Management Plans. These Contractor plans are intended to detail how the contractors themselves (and their subcontractors) will implement the management actions, mitigation measures and monitoring actions required outlined in the PCR to enable effective delivery of the commitments that are their responsibility.

1.2 Applicability of the Framework C-ESMP

This document and the topic specific actions that sit beneath it are applicable to relevant TA Project employees, and all Construction Contractors and subcontractors involved in the construction of the project. The TA is ultimately accountable for the implementation of this Framework C-ESMP and ensuring that the Construction Contractors comply with it. Construction Contractors are expected to tailor the FW C-ESMP to meet project requirements in the light of any further information received as the project progresses.

1.3 Environmental and Social Commitments

The Project is subject to various environmental and social commitments (as per the PCR) that are ultimately overseen by the TA. These will be delivered through the implementation of a Project (or TA) Health, Safety and Environmental Management System (HSE-MS) (to be developed).

1.4 Document Management

This Framework C-ESMP will be reviewed and updated at least once a year during the construction phase as well as when significant changes deem it necessary. The same shall apply to the any other topic-specific management plans and the contractors' plans. When complete, this and the other documents owned by TA will be managed in line with the requirements of the TA internal systems (including Management of Change Procedures).

2 HSSE Standards

2.1 Overview

The Project is subject to a range of policies, legal & regulatory requirements and other applicable technical, environmental and social standards and requirements, as outlined below. This Framework C-ESMP is intended to help ensure that such standards and requirements are met. Where standards are inconsistent or contradictory, the Project will adopt the most stringent (unless otherwise justified).

2.2 National Legislation

The TA and all Construction Contractors and sub-contractors are required to comply with all relevant national regulatory requirements. All of these parties will also be required to have a process in place for identifying and verifying the applicability to the project of any new legal requirements.

Ecological permits for the Project are issued by the Nature and Environment Protection Agency (NEPA) of Montenegro. The Construction Contractor must ensure that all relevant environmental and social requirements of these permits are addressed and adhered to, as well as any requirements arising from the revision/amendment of these permits.

The Construction Contractor must also ensure that the relevant requirements of the various other construction-related permits for the Project issued by national (and local) regulators are complied with. Any requirements arising from the revision/amendment of those permits must also be applied.

2.3 International Standards

The international standards to be applied to the Project include the following as a minimum:

- The EBRD Performance Requirements(2014).
- Relevant international industry practice guidelines,
- Relevant international conventions ratified by Montenegro.
- Relevant inter-governmental agreements ratified by Montenegro.
- Any other additional Project-specific standards adopted for the Project.

Commitments made by the Company as part of the Environmental and Social Impact Assessments process and Stakeholder Engagement process are also considered relevant standards and commitments. These include those outlined in the PCR (section 7).

3 The Project Environmental and Social Management Plans

3.1 The Topic – Specific Management Plans

This Framework C-ESMP is the overarching document under which will sit a range of other Topic Specific Management Plans (see Project Commitments Register). These topic-specific plans will be further developed when the Contractor has been selected and further detail on the construction methods and project baseline is available.

The topic-specific plans (to be developed by the Contractor with performance monitored and overseen by the TA) will outline the management actions, mitigation measures and monitoring actions to be carried out by the Construction Contractor and any sub-contractors, and explain in detail how such actions will be implemented on the ground (i.e. exactly what will be done and how, when, where, by who, and with which resources). As such, each of these plans will identify, for the construction phase:

- Mitigation measures and management actions to address potential risks and impacts.
- Key environmental and social monitoring requirements.
- Roles and responsibilities for management and monitoring measures.
- Key competency and training requirements.
- Key Performance Indicators (KPIs) for assessing ESMP performance.
- Additional verification procedures to ensure that the objectives of the plan are met.

In addition to the above, the Project also has a specific:

- **Stakeholder Engagement Plan (SEP)**, which outlines the approach to be taken to identifying and interacting with affected Parties. The SEP also includes a **Grievance Mechanism** to enable concerns regarding the project to be raised by the community and addressed by the Project.
- **Land Acquisition and Resettlement Framework (LARF)** which outlines the approach towards land acquisition and resettlement required for Project needs.

3.2 Link to the TA's Internal Systems

This Framework C-ESMP and any associated elements of the Contractor Topic Specific Management Plans and Project Commitments form an integral part of TA's internal Health, Safety and Environmental Management System (HSE-MS) (to be developed).

4 Roles, Responsibilities and Competencies

The delivery of the project commitments referenced in the Project Commitments Register (PCR) is the responsibility of both TA and its Construction Contractors and sub-contractors as outlined above. In particular the

TA is ultimately **accountable** for HSSE performance during the construction phase.

Construction Contractor is **responsible** for establishing appropriate processes and ensuring that HSSE staff have the necessary training and competency to perform their jobs.

As part of this the Construction Contractor will develop a training plan identifying all competency training and awareness requirements that are considered necessary to implement the project in accordance with the FW CESMP, and Project Commitments and Standards. This training plan shall be approved by TA.

Further information on roles and responsibilities is provided in Section 6.

5 Mitigation, Management, Monitoring and Verification Activities

5.1 Mitigation and Management Activities

The generic management and control actions and mitigation measures required of TA staff and its Construction Contractors (and subcontractors) are described in the PCR (section 7).

5.2 Environmental and Social Monitoring Activities

Monitoring Activities are intended to meet both:

- TA's obligations to adequately understand and manage the Project's potential impacts during each construction activity and at each location.
- Specific requirements of the Montenegrin authorities.

Monitoring provisions for the construction phase of the Project shall therefore be developed through the process described in Table 1 below.

Table 1: Approaches to Monitoring

| Objective | Approach |
|---|---|
| Stage 1: Risk Management | Determine and implement monitoring requirements for significant construction activities that are commensurate with: <ul style="list-style-type: none"> • 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. |
| Stage 2: Regulatory Compliance | Define regulatory monitoring programs that are fully consistent with the principles developed in Stage 1. |

5.3 Monitoring, Verification and Audit Procedures

Monitoring verification and audits requirements (audits and inspections) will be managed on three levels, as shown in **Table 2**.

Table 2: Auditing Management System

| Tier | Objective | Responsible | Description |
|---------------|------------------------|-------------|---|
| Tier 1 | TA system audits | TA | These audits are aimed at assessing the TA HSE Management System elements and assessing their continued suitability throughout the Project life cycle. |
| Tier 2 | TA ESMP audits | TA | These audits are undertaken by the TA team to confirm compliance by the Company and its contractors with the Topic Specific Management Plans, which are audited in a systematic manner rather than in a site specific way. |
| Tier 3 | Contractor self-audits | Contractor | These audits are to be undertaken by the contractors to confirm their own compliance and that of their subcontractors with their own C-ESMPs and HSE-MSs. The Contractors shall ensure that audit reports are provided to TA. |

5.4 Key Performance Indications (KPIs)

Key Performance Indicators (KPIs) are quantitative or qualitative measurements used to gauge performance over time. They can be used to assess the effectiveness of control measures and demonstrate performance improvements during steady state operations. Relevant KPIs should be developed for each of the topic specific construction phase Management Plans building on the information provided in Section 7. The Project will comply with the HSSE standards as outlined in Section 2, and associated threshold values. If KPI values exceed the levels given in these standards mitigation measures will be investigated and refined as necessary.

5.5 Contractor Self-Auditing Activities

The Contractor will need to monitor its own performance against project commitments and standards. Depending on the nature of the work scope, these should include:

- The method of measuring performance against objectives and targets (including KPIs);
- Routine reports (e.g. weekly, monthly);
- Arrangements for HSE inspection and audits (by the contractor);
- Reporting of incidents (actual and near-misses);
- Final HSE report at end of contract.

6 Detailed Environmental and Social Management & Monitoring Plan (ESMMP)

6.1 Introduction

As outlined above, the TA (and for construction its contractors) will develop detailed Environmental and Social Management and Monitoring Plans (ESMMPs or ESMPs) for the Project construction, operation and (at the appropriate time) decommissioning. The latter is not covered further here. These will demonstrate how the Project intends to fulfil the requirements presented in the EBRD Performance Requirements (including PR 1). They will take into account the required management, mitigation and monitoring measures as identified in the ESIA, and the other Project Standards and Commitments. During construction the contractors will be responsible for development and implementation of these plans and the TA will ultimately be responsible for oversight and monitoring of the plans, requiring the contractors to implement corrective actions if necessary.

6.2 Scope of the ESMMPs

The ESMMPs will be developed specifically for the Project and will cover all activities conducted by or on behalf of the TA on the Project site, including by contractors. They will be dynamic documents and will be reviewed and updated as needed to continually improve the management of environmental and social (including health and safety) impacts. This will include changes associated with the Project phase and its environmental and social performance, or updates to reflect changes in operations, the receiving environment, legislation, stakeholders, and personnel.

6.3 Roles and Responsibilities

The effective implementation of the ESMMPs is dependent on established and clear roles, responsibilities and reporting lines. The organisational structure for environmental and social management for the Project is defined below. The structure will be maintained throughout the construction, and as appropriate operation phases, while being reviewed on a regular basis to adapt as necessary.

6.3.1 Project Manager

The Project Manager (PM) acting on the behalf of the TA is the senior representative for the construction works and, as such, is the ultimate authority on all matters including environmental and social management. The PM will be appointed by the TA and will proactively work with the Contractor to minimise risks of environmental or social damage. The PM is responsible for ensuring that appropriate resources are available to the Project for ensuring compliance to the ESMMPs. The PM must be fully conversant with the conditions of the environmental approval and ensure that all stipulations within the ESMMP are communicated and adhered to by the construction team (and any subcontractors).

6.3.2 Site Manager

The Contractor Site Manager shall be responsible for the day-to-day operations of the Contract. They will be appointed by the Contractor and are expected to be in place throughout construction and operation. The Site Manager's responsibilities include:

- To ensure that all Supervisors and employees are familiar with the contents of the ESMMPs.
- Advise or instruct any person on site in matters related to environmental, social, health and safety management.
- To attend HSSE committee meetings when required.
- To achieve compliance with all Statutory Acts, Regulations and Codes of Practice.

- Report to the Project Manager on all accidents and incidents and corrective and preventative measures.
- Report to the Project Manager any public grievances (see Stakeholder Engagement Plan) or concerns raised by the local communities with respect to the project.
- Project related Health and Safety.

The Site Manager reports directly to the Project Manager, oversees site work and liaises with the construction team.

6.3.3 Environmental, Social, Health and Safety Managers

The TA and Contractor Environmental, Social, Health and Safety (HSSE) Managers will be responsible for the day-to-day environmental and social management during construction. This includes implementing the contractor monitoring programmes and maintaining the monitoring databases as well as the reporting of the results.

6.3.4 Community Liaison Officer

The TA will appoint a Community Liaison Officer (CLO) who will be responsible for managing grievances, and will own the grievance log to manage and resolve them with support from the EHS Manager and Project Manager. The CLO will also be responsible for communication between the Project and non-governmental stakeholders e.g. members of local communities.

6.3.5 Workers/Employees

Key responsibilities of each worker/employee includes:

- Reading and understanding the requirements contained in the ESMMPs;
- Attending HSSE training as required;
- Being responsible for observing measures for their own safety and for others who may be affected by their acts or omissions;
- Co-operating with the management on HSSE related measures;
- Specific responsibilities as defined by the ESMMPs;
- Seeking out hazards and reporting them for correction;
- Intervening when they come across unsafe work/conditions and use right/ obligation to stop work, unless act/condition is safe; and
- Adhering to HSSE rules at all times.

6.4 Contractor Management

The TA will develop a Contractor Management Plan which it will use to make sure that the Contractor delivers the management and mitigation actions identified in this document.

6.4.1 Inspection, Monitoring and Audit

Monitoring of the environmental, social, health and safety impacts of the Project activities will be undertaken to increase the effectiveness of the ESMMPs as outlined in Section 5. Through the process of inspection and auditing, the Project will ensure that the conditions stipulated in various permits are complied with. The inspection and audits will be done by the Project/Contractor HSSE staff in coordination with other external agencies as appropriate. The process of inspections and audits will be documented. The inspection and audit findings are to be implemented by the Project staff in-charge in their respective areas.

6.4.2 Reporting and Review

The Project will develop and implement a programme of reporting through all stages of the Project cycle. Delegated personnel shall be required to fully comply with the reporting programme including both timely submissions of reports and acceptable level of detail. Reporting will include maintaining an incident record register and HSSE performance reports (weekly, monthly, quarterly, half yearly, yearly etc.).

6.4.3 Documentation and Record Keeping

Documentation is an important step in implementing the ESMMPs. The TA (and its Contractors) will establish a documentation and record keeping system to ensure recording and updating of documents. Responsibilities will be assigned to relevant personnel at each level for ensuring that the ESMMP documentation system is maintained and that document control is ensured through access by and distribution to, identified personnel in form of the following:

- Environment, Social, Health and Safety Management System manual;
- Legal register;
- Operation control procedures;
- Work instructions;
- Incident reports;
- Emergency preparedness and response procedures;
- Training records;
- Monitoring reports;
- Auditing reports; and
- Complaints register and issues attended/closed.

6.4.4 External Reporting and Communication

The Project Manager is accountable for ensuring that communication with regulatory agencies and stakeholders are maintained as per the requirements of all Statutory Acts, Regulations and Codes of Practice. All complaints and enquiries are to be appropriately dealt with and records are to be maintained in a Complaint/Enquiry Register by the responsible member of the HSSE team.

6.4.5 Internal Reporting and Communication

Inspection and audit findings, along with their improvement programmes, are to be regularly reported to the senior management for their consideration. The same are also to be communicated within the staff working on the Project. To maintain an open communication between the staff and management on EHS issues the following communication methods will be adopted:

- Team briefings;
- On-site work group meetings;
- Work specific instructions; and
- Meeting with stakeholders.

6.4.6 Review and Amendments

Review details are outlined earlier. Following review, the HSSE Managers will be responsible for making the amendments in the ESMMPs and seeking approval from the Project Manager. The amended ESMMPs will be communicated to all staff to which changes are relevant.

6.5 Topic-Specific ESMMPs

A number of detailed and topic-specific ESMMPs will need to be prepared by the TA's chosen contractor(s) (and checked for compliance by the TA) prior to the commencement of construction. Some of these plans may be combined where appropriate, but as a minimum these are expected to include the following

- Biodiversity Management Plan
- Land Acquisition and Livelihood Restoration Plan (LARP)
- Water Resources and Water Quality Management Plan
- Soil Quality and Erosion Management Plan
- Air Quality Management Plan
- Waste Management Plan
- Hazardous Materials Management and Spill Prevention Plan
- Procedures for working in and near water courses Crossing Plan
- Construction Traffic Management Plan
- Construction Noise and Vibration Management Plan
- Chance Finds Procedure
- Labour and Working Conditions Management Plan
- Human Resources Policy
- Emergency Preparedness and Response Plan

The following documents have already been developed and will be further refined as the project progresses:

- Stakeholder Engagement Plan.
- Land Acquisition and Resettlement Framework (to be developed into a LARP)

6.5.1 ESIA Commitments and Actions

Section 7 below summarizes the key commitments of the ESIA process to be delivered by the Contractor during the implementation of the construction works to ensure appropriate mitigation and management of construction related environmental and social impacts. The commitments and actions in the table form the basis for the development of the overarching ESMMPs. Whilst commitments are considered the responsibility of the Contractor unless otherwise specified, accountability for ensuring that they are undertaken in a timely manner remains with the TA.

7 Project Commitments Tables

7.1 Commitments to be delivered by the TA (including input into scheme design)

| Project activity | EHS and/or safety aspect and potential effect being addressed | Specific commitment/action | Responsible Party, Means for verification, Timing and frequency |
|--|---|---|---|
| Traffic | | | |
| Project design | Project road to be designed to International Standards | TA to ensure project design is completed to international standards. Design standards will apply GIP where it can be incorporated in existing road design legislation | TA is responsible. Project design to be complete to international standards and GIP |
| Air Quality | | | |
| Additional baseline air quality monitoring | To provide a robust baseline against which air quality impacts of the Project during construction and operation can be assessed. | The TA through its contractor will engage a specialist subcontractor – (eg CETI) for implementation of additional baseline air quality monitoring for NO ₂ , PM ₁₀ and PM _{2.5} | Completed baseline monitoring report, Samples need to be taken at regular intervals over a period of one year. Monitoring to be undertaken in accordance with the Rulebook on the manner and conditions for monitoring the quality of air (Official Gazette of Montenegro No 21/11, 32/16). |
| Monitoring | Monitoring of impacts from air quality | The TA will 1. Undertake regular off-site inspections, where sensitive receptors are nearby (within 100m of site boundary). 2. Increase frequency of inspections when activities with a high potential to produce dust are being undertaken and during prolonged windy or dry conditions. | Monthly monitoring reports |
| Water Resources | | | |
| Independent technical audit of drainage design | Flood risk | The TA will review the detailed drainage design to ensure it includes appropriate provision for: i) the increased amounts of run off that will be produced by the widened road and ii) climate change allowance to account for severe rainfall events to confirm that there will be no flooding as a result of the Project, and that it includes adequate protection for Tivat Saline | Report to be completed prior to construction commencing confirming that either design as currently proposed is fit for purpose or setting out amendments to drainage design that need to be incorporated to ensure no off-site flooding or impacts on the Saline as a result of the Project. |
| Additional baseline water quality monitoring | To provide a robust baseline against which water resource impacts of the Project during construction and operation can be assessed. | The TA through its contractor will hire a Specialist contractor (eg CETI) to implement additional baseline water quality monitoring programme prior to construction commencement to identify variation in concentrations of key water quality indicators on a seasonal basis. | Completed baseline monitoring report Samples to be taken every two months at same locations as baseline monitoring in the ESIA. Monitoring to be undertaken in accordance with the Rulebook on the quality and sanitary technical conditions for wastewater disposal, the method and procedure of wastewater quality testing and the content of wastewater quality report ("Official Gazette of Montenegro" No. 56/19). Additional Rulebook for water quality monitoring: Regulation on |

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| | | | the classification and categorization of surface and groundwater ("Official Gazette of Montenegro", No. 2/07) |
| Biodiversity | | | |
| Preconstruction survey for freshwater invertebrates | Biodiversity baseline finalisation and assurance that mitigation for freshwater invertebrates is sufficient. | The TA through its contractor will hire an ecological expert to complete a freshwater invertebrate survey in and along the watercourses potentially impacted by the project. Survey will be used to inform and finalise the biodiversity baseline and confirm that mitigation presented will be sufficient for these species. | Report of survey results and findings incorporated into ESIA To be completed prior to the start of construction, and undertaken between the 15 October and the 15 June (outside of the dry season) |
| Preconstruction survey to determine the exact location of culverts for animal crossing | Mitigation of project risks related to habitat fragmentation and vehicular collision | The TA through its contractor will use an ecological expert will survey the road to assess optimal locations for specialised animal crossing points. As well as optimal locations this assessment will include review of required supporting infrastructure such as fencing and crossings design. This will be used to determine the exact locations and designs of animal crossings along the project road. | Report of survey findings and recommendations incorporated into ESIA and final project design To be completed prior to the finalisation of road design |
| Social Issues | | | |
| Development of a Land Acquisition and Resettlement Plan | Persons and businesses impacted by the Project – economic and physical displacement (Development of a Land Acquisition and Resettlement Plan) | The TA will identify additional experienced staff (seconded if needed) to guide PR5 compliant consultation, disclosure, data collection, impact identification, design of entitlements, implementation of resettlement plan, monitoring and grievance management. | TA Social Manager hired and operational From Q2 2020 onwards – the development of the LARP can begin once the Expropriation Study is complete, and the Project is declared in the Public Interest. Further details on monitoring frequencies can be found in the LARF. |
| | | The TA (with appropriate consultant support) will: i) Develop and implement a compliant engagement process with affected HH; ii) Develop and implement an effective resettlement grievance process; iii) Design and implement a census, asset inventory and supplementary Socio-Economic Survey with affected HH; iv) Develop a complete understanding of resettlement impacts and differentially impacted groups v) Development of a complete entitlement framework, in consultation with affected HHs; vi) Document and implement additional compensation and support measures to mitigate resettlement impacts effectively, including support for livelihood restoration and support for differentially impacted groups; vii) Continue engagement with affected HHs throughout the resettlement compensation and support processes; viii) Monitor and report on implementation of resettlement compensation and support measures; | Completed LARP (including Asset inventory, Census, Entitlements Framework and livelihood restoration, as further detailed in the Commitments column). Construction should not commence until full compensation and support received / being delivered to HH or business (with exceptions when certain cases are being processed by the courts however ensuring relevant expropriation funds are earmarked and deposited in an escrow account) |
| | | The TA will contract an independent third party to carry out an external completion audit of the LARP for all phases of the road improvement Project and Implement any corrective measures identified in the external completion audit | TA Resettlement database, External completion audit completed, and any additional measures, Grievance mechanism log and redress register |

7.2 Stakeholder Engagement Commitments to be delivered by both TA and the Contractors

| Project activity | EHS and/or safety aspect and potential effect being addressed | Specific commitment/action | Responsible Party, Means for verification, Timing and frequency |
|---|---|--|--|
| Public consultation regarding traffic, noise and other issues | Ensuring effective engagement with the public during construction relating to traffic issues and amending project design and activities accordingly, including the need of the TA and contractor(s) to have community grievance mechanisms in place | <p>1. TA and contractor(s) to implement detailed complaint procedures and community liaison. 2 Regular public consultation will be held with the local community and road users throughout the project cycle. These will report the results of additional studies as they are completed.</p> <p>3. A website/freephone telephone number will be provided so interested parties can access up to date information on the project and raise any concerns. 4. During the construction phase local residents will be provided with details and timings of traffic management plans.</p> <p>NB, Due to the Covid-19 pandemic in early 2020 plans for the public disclosure and consultation process of the ESIA package and the identified additional survey work (traffic and biodiversity related) have had to be amended.</p> <p>Plans for public disclosure of the ESIA package were changed in line with the EBRD’s Guidance Note for PR10, released to suggest ways of continuing project engagement in a safe and secure manner. Due to the restrictions of movement the planned community engagement meetings were no longer possible. The revised approach includes uploading the ESIA documents on the TA, EBRD and municipality websites and contacting the municipality and local community representatives to notify them of their availability (in advance and at the time of release) and ask for written comments and feedback by a certain date. Notification of their availability will also be made in local newspapers and on local radio stations.</p> <p>The approach to public consultation and grievance management will be continuously reviewed as the Covid-19 situation develops, and will be implemented to the extent possible as described in the above-mentioned commitments. .</p> | Review of grievance mechanism log, Every 6 months |
| Development of a Stakeholder Engagement Plan (SEP) | Management of impacts on communities residing in the PAA (Development of a Stakeholder Engagement Plan (SEP)) | <p>TA/contractor to update and implement a Stakeholder Engagement Plan (SEP) to ensure ongoing communication with project affected communities and to manage expectations in relation to employment, compensation and Grievance Mechanism (GM) process. NB, as above, due to the Covid-19 pandemic in early 2020, the approach to public consultation and stakeholder engagement has had to be amended for the time being. The approach to public consultation and grievance management will be continuously reviewed as the Covid-19 situation develops, with the approaches described in the Project SEP being the guiding principles.</p> <p>The GM process for the Project will be designed and implemented to capture any concerns or complaints about the Project, including construction, traffic, noise, land acquisition etc.</p> <p>The contractor is to track grievances related to construction activities and adjust mitigation/management measures accordingly where necessary.</p> <p>The GM will ensure the Project is aware of any complaints, so that appropriate additional mitigation and management measures can be put in place, as necessary.</p> | <p>Audit of i) Completed SEP. ii) Minutes of Meetings with local stakeholders, including the local schools iii) Grievance mechanism log and redress register iv) Construction Traffic Management Plan details shared with local community stakeholders</p> <p>Continuous – monitoring of the means once every three months</p> |

| | | | |
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| | | <p>The Project will continue to engage with local communities, businesses and other key road users to ensure that the design is appropriately tailored to maximise accessibility for local and regional stakeholders. This will include consultation regarding the appropriateness of crossing point locations to maximise safety of pedestrians wishing to cross the road.</p> | |
| | | <p>Local stakeholders will also be engaged to discuss road safety and incident reporting, and a programme of awareness-raising related to construction-related traffic. This will be particularly important for any school children attending the two units of Radanovici school, or Arcadia Academy. Details will be captured in the Project's SEP, once the most appropriate method(s) has been defined together with the school leadership and pupils.</p> | |
| | | <p>Relevant details of the CTMP will be shared with local stakeholders. This will include advance details of construction works, and any road closures/diversions etc. Notices will be erected in local towns and posted on the TA's website, so that road users can plan their travel appropriately.</p> | |
| | | <p>Grievances will be carefully monitored, and where necessary, additional traffic management measures implemented in response to issues raised by stakeholders.</p> | |
| | | <p>The contractor is to track grievances related to worker-community interaction and health issues (both real and perceived) in relation to construction activities and adjust mitigation accordingly in consultation with the complainant where appropriate.</p> | |

| 7.3 Specific Commitments to be delivered by the Contractors (and monitored by TA) | | | |
|--|--|--|---|
| Project activity | EHS and/or safety aspect and potential effect being addressed | Specific commitment/action | Responsible Party, Means for verification, Timing and frequency |
| Traffic Management | | | |
| Construction Traffic Management Plan | Management of traffic risks during Project construction. | 1. The contractor will develop a specific Construction Traffic Management (C-TMP) which is to include the appropriate traffic mitigation measures outlined in this FW C-ESMP below (and the ESIA). | Completed C-TMP to be reviewed and verified by the TA Review and verification by the TA to be complete prior to construction commencing |
| Mitigation measures to be included in the C-TMP | Minimising traffic congestion to reduce impacts of disruption and potential accidents to road users and the local community | 1. Construction works will not be carried out during the peak traffic flow months of June, July and August | To be completed in cooperation with the local police and municipality. Site audit by TA, Once every two weeks |
| | | 2. Timings for diversions, closures and others road measures which may have a negative impact on traffic flows will be programmed to occur to have the least impact on traffic. Journey time analysis will be completed to determine impact proposed works may have on road users. | |
| | | 3. Transport routes to and from construction sites to be planned to enable vehicle and pedestrian access to be maintained throughout construction to prioritise road user, pedestrian and local community safety | |
| | | 4. Transport routes to and from site planned and managed to avoid debris and mud being introduced onto the road network | |
| | | 5. Traffic flows around construction sites are to be managed through application of appropriate traffic management techniques, including traffic signal operation | |
| | | 6. Construction plans to ensure access to local businesses, homes, schools, and bus stops will be maintained | |
| | | 7. Local sourcing of materials will be prioritized to reduce haul distances | |
| | | 8. Construction vehicles prohibited from entering and exiting construction sites during peak traffic flow periods | |
| | Mitigation measures to manage issues related to traffic speeds | 1. Effective speed management will be implemented throughout the project with clearly posted speed limits to be adhered to during works. Construction vehicles will be restricted to 10 mp/h inside construction sites and national speed limits outside | |
| | | 2. Signs will be clearly marked and visible to road users | |
| 3. Old, unneeded signs will be covered or removed. | | | |
| 4. Upon completion of works clear and concise signage will be put in place to ensure road users are aware of the applicable speed limit and where changes in the posted speed occur. | | | |
| Mitigation measures to manage access to and from construction site compounds | 1. Contractor(s) will be required to carefully plan site access and in place relevant health and safety warning signage and provisions to minimize any risk to workers, local communities, users of the route/areas etc. | | |

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| | | <p>2. The proposed location of the site should be selected on the basis that turning movements to and from the site can be conducted safely and without creating disbenefits to other roads users and local communities.</p> <p>3. Access to the site should be paved and wheel cleaning facilities installed so that debris is not taken from site vehicles onto the public roads</p> | |
| Noise Management | | | |
| Noise and Vibration Management Plan | Management of noise and vibration impacts during construction of the project road | 1. The contractor (s) is required to complete a specific Construction Noise and Vibration Management Plan (C-NVMP) which is to include all appropriate mitigation measures outlined in this FW C-ESMP. | Completed C-NVMP to be reviewed and verified by the TA, Review and verification by the TA to be complete prior to construction commencing |
| Mitigation to be included in the C-NVMP | Mitigation measures to control impacts related to construction noise and vibration | <p>1. Construction works will be restricted to take place during acceptable hours according to local context. Acceptable working hours will be decided upon in accordance with local guidance and agreed upon with each relevant Municipality.</p> <p>2. Contractor (s) will be required to use modern, silenced and well-maintained plant at all times, conforming to appropriate standards set out in adopted Directives or replacement legislation of Montenegro</p> <p>3. Machinery, including vehicles, will be shut down or throttled back when not in use</p> <p>4. Engine compartments will be closed when equipment is in use and the resonance of body panels and cover plates reduced by the addition of suitable dampening materials. Any rattling noise will be addressed by the tightening of loose parts or the addition of resilient materials</p> <p>5. Semi-static and static equipment will be sited and orientated as far as is reasonably practicable away from noise-sensitive receptors and have localised screening where deemed necessary;</p> <p>6. Static plant known to generate significant vibration levels will be isolated or fitted with appropriate dampening to reduce transmission into the ground</p> <p>7. Generators and water pumps required for 24-hour operation will be super-silenced or screened as appropriate; and their location carefully considered to minimise disturbance</p> <p>8. Crane spindles, pulley wheels, telescopic sections and moving parts of working platforms will be adequately lubricated in order to prevent undue screeching and squealing</p> <p>9. Where possible, mains electricity will be used rather than generators where it is safe to do so</p> | Side audit by the TA, Once every two weeks |
| Air Quality | | | |
| Air Quality Management Plan (C-AQMP) | Management of air quality impacts during construction of the Project | 1. The Contractor is required to develop a Construction phase Air Quality Management Plan to include all appropriate mitigation measures outlined in this ESMP | Completed C-AQMP to be reviewed and verified by the TA, Review and verification by the TA to be complete prior to construction commencing |
| | General site management | 1. Maintain records of dust and air quality complaints in the Air Quality Management Plan. Identify causes and measures taken to reduce emissions. | Grievance mechanism log and redress register, Once every three months |

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| Mitigation to be included in the C-AQMP | | 2. Record any exceptional incidents that cause dust or air emissions. | Site audit by TA, Once every two weeks |
| | Site preparation and maintenance | 1. Plan site layout so that machinery and dusty activities are located away from receptors where possible | |
| | | 2. Erect solid screens or barriers around dusty activities or site boundary that are at least as high as any stockpiles. | |
| | | 3. Keep site fencing, barriers etc. clean using wet methods. | |
| | | 4. Cover stockpiles with the potential to produce dust. | |
| | Site vehicles and equipment | 1. Vehicle loading and movements to be optimised, with backfilling where possible, to minimise the number of journeys | |
| | | 2. Journeys to be planned to avoid peak hours | |
| | | 3. Maximum speed limits on surfaced and un-surfaced haul route and work areas to be specified | |
| | | 4. Ensure all vehicles switch off engines when stationary. | |
| | | 5. All onsite and onroad vehicles and machinery to be appropriately maintained and to comply with relevant emission standards. | |
| | General construction activities | Cutting, grinding or sawing equipment should be fitted with, or used in conjunction with, suitable dust suppression techniques such as water sprays or local extraction. | |
| | | Drop heights to be minimised and fine water sprays to be used when appropriate. | |
| | | Ensure an adequate water supply on site for effective dust suppression / mitigation using non-potable water where possible. | |
| | Demolition | Ensure effective water suppression during demolition operations. | |
| | | Soft-strip inside buildings before demolition, retaining walls and windows to contain dust. | |
| Earthworks | Re-vegetate exposed areas / soil stockpiles as soon as practicable to stabilise surfaces | | |
| Construction | Ensure sand and aggregates are stored in bunded areas and not allowed to dry out. | | |
| | Bulk cement and other fine powder materials to be delivered in enclosed tankers and stored in silos with suitable control systems to prevent overflow. | | |
| Trackout | Haul routes and construction site to be damped down to minimise dust generation, Vehicles leaving the site to be covered, Dry sweeping of large areas to be avoided. | | |

| Water Quality | | | |
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| Construction Water Resources Management Plan (C-WRMP) | Management of impacts on water resources during construction of the Project | 1. The Contractor is required to develop a Construction phase Water Resources Management Plan to include all appropriate mitigation measures outlined in this ESMP | Completed C-WRMP to be reviewed and verified by the TA Review and verification by the TA to be complete prior to construction commencing |
| Mitigation to be included in the C-WRMP | General GIP construction mitigation measures | 1. Handling of fuel, lubricants, oils and chemicals will take place in secure, bunded areas. | Site audit by the TA, Once every two weeks |
| | | 2. Spill kits, including booms, will be provided to clean up any minor spills of fuel, lubricants, oils or chemicals. | |
| | | 3. Secondary containment devices (drop cloths, drain pans) will be used to catch leaks or spill while removing or changing oils from vehicles or equipment. For small spills, absorbent materials must be used. | |
| | | 4. Drip trays will be used under compressors, pumps, motors and any redundant plant and during refuelling. Drip trays should be emptied at regular intervals to prevent overflow. | |
| | | 5. Fuel, oil or hazardous materials required to be stored, will be stored within secondary containment (designed to contain at least 110% of the total capacity of the storage containers) located greater than 100m from a watercourse or waterbody. Walls and floors will be constructed of concrete or other suitably impermeable material. No drains from the storage area will be installed. | |
| | | 6. No more than 100 litres of fuel, lubricant or any other hazardous material stored at any one place | |
| | | 7. On-site vehicles and equipment will be inspected regularly for leaks and all leaks shall be immediately repaired. Incoming vehicles and equipment will be checked for leaks. Leaking vehicles/equipment will not be allowed on-site. | |
| | | 8. When plant maintenance is carried out on site, used oil will be stored in a bunded area for collection. Oil and fuel filters will also be stored in a designated bin in a bunded area for separate collection. | |
| | | 9. Construction equipment and vehicles will not be re-fuelled within 100m of a watercourse and re-fuelling should be undertaken on an impermeable surface. | |
| | | 10. Plant and wheel washing to be carried out on an area of hardstanding at least 10 m from any watercourse or surface water drain. | |
| | | 11. All exposed soil and any soil stockpiles will be covered to prevent erosion run-off of mobilised suspended solids or turfed with grass. Soil stockpiles will not be higher than 2m or have slopes greater than 25° to prevent run-off of sediment. Topsoil and sub-soil will be stored separately. | |
| | | 12. Stockpiles of construction materials (e.g. aggregates sand and fill materials) will be covered with tarpaulin or a silt fence constructed using a suitable geotextile, as a matter of course, but particularly during rainstorms. | |
| | | 13. Identify and clear any existing drains or gullies that are blocked or not functioning correctly. | |
| | | 14. Where practicable, local perimeter drains should be constructed around working areas to collect suspended run-off. | |

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| | | <p>15. The discharge of any untreated wastewater into surface waters will be prohibited.</p> <p>16. Sediment laden water from the work sites will be filtered through the ground or settlement lagoons prior to controlled release to a watercourse.</p> <p>17. Earth bunds will be created to prevent an accidental spill of hydrocarbons or other chemicals escaping from the work sites reaching the watercourse.</p> <p>18. Water quality will be monitored throughout the duration of the works and treated wastewater discharges should comply with specified water quality standards (including Project and national standards).</p> <p>19. All materials will be stored above flood level.</p> <p>20. No waste materials, including cement contaminated water and any concrete debris, to be disposed of in any surface waters.</p> <p>21. Portable toilets will be provided at bridge construction sites.</p> <p>22. Washing of construction equipment or vehicles will be forbidden within 100m of watercourse.</p> <p>23. Generators will be located more than 20 meters from the river on impermeable surfaces.</p> <p>24. Areas where concrete mixers can wash out leftover concrete will be provided; this may be in the form of a lined settling pond at each site.</p> | |
| Biodiversity | | | |
| Biodiversity Management Plan | Management of the risks to Biodiversity during construction | The contractor is required to complete a specific Construction Biodiversity Management (C-BMP) which is to include the appropriate biodiversity mitigation measures outlined in this ESMP and the ESIA | Completed C-BMP to be reviewed and verified by the TA Review and verification by the TA to be complete prior to construction commencing |
| Hiring of an Ecological Clerk of Works (ECoW) | Management of the risks to Biodiversity during construction | The contractor is required to hire a suitably qualified Ecologist as an Ecological Clerk of Works. This person will be responsible for monitoring protected and Priority Biodiversity Feature species and habitats, managing mitigation related to Biodiversity during construction, and conducting tasks as detailed in this ESMP and ESIA. | ECoW contract verified by TA 2 months Prior to construction |
| Mitigation to be included in the F-BMP | Loss of Native Habitat | Areas for vegetation clearance will be clearly marked out. Laydown areas and compounds will be sited to avoid unnecessary clearance of vegetation. Existing tracks or natural gaps in vegetation will be used as preferred access routes where practical. The workforce will adhere to working corridors and will be educated on preventing bush fires and this will not be used as a land clearance method | Site audit by the TA , Once every two weeks |

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| | | <p>Tree/ scrub clearance will be undertaken outside of the bird breeding season (March to August inclusive) where practical. If this is not practical, a pre-clearance nesting bird check will be undertaken of the vegetation to be cleared by the ECoW. Should nests be found, clearance will be deferred until after the season is over. The EcoW will also carry out pre-clearance surveys for roosting bats, details in a designated section for bats.</p> | |
| | | <p>Areas where soil has been temporarily removed during construction will be filled with soil (same as removed).</p> | |
| | | <p>Where vegetation has been temporarily cleared to form the Right of Way, it will be restored by reseedling or replanting using locally collected seed mixes and saplings. The ECoW will be responsible for habitat restoration, and they will ensure that the habitat restored is of the same habitat type as was originally present. The restored habitat, after recovery, should be as good as, if not better, than what was present originally (the like for like or better principal).</p> | |
| | Degradation of Terrestrial Habitat | <p>Topsoil and subsoils will be removed and stored separately for subsequent restoration. Topsoil piles will be no more than 3m high and protected from works activities. Topsoil will be monitored to ensure there is no compaction or waterlogging.</p> | |
| | | <p>Use of GIP to minimize impacts associated with dust and pollution (e.g. use of drip trays understanding equipment, designated refuelling areas with hardstanding).</p> | |
| | Loss of Aquatic Habitat | <p>The removal of any channels will occur outside of the frog reproductive season (March to August) to avoid disturbing breeding and destroying spawn or larvae. This is because two frog species found in these channels are recognised as Priority Biodiversity features.</p> | |
| | | <p>A pre-clearance survey will be conducted by the ECoW of any channels that will be removed as part of the project. If any adult reptiles or amphibians are found, they are to be safely captured and relocated to suitable nearby habitats. There is the potential for threatened freshwater invertebrates to also be found in these channels. Pre – clearance surveys will also look out for freshwater invertebrates, and if any Priority Biodiversity Features they are to be safely captured and relocated to suitable nearby habitats.</p> | |
| | Degradation of Aquatic Habitat | <p>Execution of works in the watercourses from 15 June to 15 October, or in the rest of the year when water levels are similarly low and some of the watercourses have dried up completely.</p> | |
| | | <p>Use of GIP to minimize impacts associated with dust and pollution (e.g. use of drip trays understanding equipment, designated refuelling areas with hardstanding).</p> | |
| | | <p>Detail of specific mitigation to prevent degradation of waterways is provided in the Water Quality section of this table and must be strictly adhered to avoid degradation of aquatic habitats and thus negative impacts on aquatic PBF species.</p> | |
| | Disturbance of Fauna | <p>Pre-clearance site surveys will be conducted before the commencement of all works to prevent animals present within the working area being killed or injured during works. Checks will be for all vertebrate species and will specifically include ground nesting birds and reptiles.</p> | |

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| | | Off-road travel will be prohibited where practical. The workforce will adhere to working corridors. Appropriate speed limits will be applied, and traffic will be restricted to existing and/or dedicated haul routes to reduce direct mortality and disturbance from vehicles during construction. Penalties for violation will apply. | |
| | | Works will not be lit where this is practical. Where lighting is required it will be directional and non-UV lighting sources will be employed. | |
| | Habitat Fragmentation | Fencing will be restricted to work compounds and associated areas including waste disposal areas to ensure that habitats are not fragmented by workforce activities, unless this is for species protection measures as deemed by the EcoW. | |
| | Worker Impacts | Contractors will be required to conduct regular debris clean-up activities upon possession of the work site and to maintain the assigned sections throughout project construction including by regular collection and hauling of wastes to government-approved landfill locations. | |
| | | Temporary barriers will be used to prevent wildlife from accessing waste disposal areas and similar areas. | |
| | | Biodiversity awareness will be included within the contractor's site induction training. This will include an inventory of all species either legally protected or listed as a Priority Biodiversity Features, using photographs, and bans on hunting, foraging, and trapping. The workforce will be educated on national regulatory requirements, as well as activities that should/shouldn't be observed in specific periods (e.g. bird nesting period) to avoid or minimize the risk of disturbance, injury, or death of PBF or protected species. | |
| | | Biodiversity awareness training will have a specific emphasis on snakes, especially on the strictly protected Meadow viper. Killing of any snake by workers will be prohibited, if snakes need to be removed from site the EcoW will be informed. | |
| | | Workers will report encounters with PBF species if in the working corridor to the EcoW | |
| | Spread of non-native/invasive species | The EcoW will pay special attention to invasive species in their surveys. Any invasive species (as listed in impacts section) identified will be removed. | |
| | | GIP (e.g. cleaning of equipment before transport to site) will be applied to prevent accidental introduction of non-native species. | |
| | Specific impacts on Terrestrial species (reptiles, amphibians, mammals) | Pre-clearance surveys will be conducted by the EcoW, and if any PBF species are identified they will be safely captured and relocated to suitable habitat. | |
| | | Fences should be installed at all areas known for mammal crossings. Further surveys are planned to decide key crossing points, however fencing is likely to be installed in the sections 0-2 km, 5-7.7km and 13-16km. These should be designed to prevent both small amphibian species and large mammals from crossing, an example of this is shown in Figure 21 in the ESIA. | |

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| | | <p>Underpasses for small animals such as amphibians and reptiles should consist of pipes or rectangular tunnels with a diameter/width of 0.4-2 m. The distance between two appropriate and available passages must not exceed 200 meters in natural areas or 500 in agricultural areas.</p> | |
| | | <p>Existing culverts will be replaced with wildlife friendly culverts. If these culverts have seasonal or permanent waterways passing through them they will be designed with ledges to allow passage of terrestrial as well as aquatic species. Additional culverts may need to be installed to allow animal to pass under the road at key crossing points to be identified in future surveys. All bridges will have ledges to the sides to allow passage by terrestrial species. All culverts will have guiding fencing installed, to direct animals away from the road and under the culverts.</p> | |
| | | <p>During construction, amphibian fencing (see figure 20), will be erected to form a barrier between the work site and any habitat, especially rivers, ditches, flood meadows and wet grassland, where reptiles, amphibians and small mammals could gain access. For a 2-metre strip alongside the fence the vegetation will be trimmed very short to create an open and therefore unattractive habitat for these small animals, further deterring them from the work site. Bucket traps for translocation will be installed at specific locations determined by the specialist and these will be emptied very early every morning. In addition, a specialist will inspect suitable habitat prior to enabling works and set translocation traps in these areas .</p> | |
| | | <p>If needed, during periods of toad migration a specialist will be on site with a watching brief and work may be curtailed during the evenings for the duration of the migration. The Community engagement team will explain the purpose of the fencing to the local population. Information leaflets will be prepared.</p> | |
| | <p>Specific impacts on bats</p> | <p>Any tree above 100mm in diameter to be checked by the EcoW for the potential of roosting bats prior to removal. If bats are found, the roost will be left undisturbed until vacated by bats. All felled trees with potential to support bats (i.e. with suitable cavities) to be left in situ (on the ground) for 24 hours to allow any bats to move. Where practical avoid felling trees between April-August.</p> | |
| | | <p>Use of non-UV sources of lighting at working sites, deposits and permanent facilities to avoid attracting nocturnal insects and the bats that feed on them.</p> | |
| | | <p>Installing of bat boxes within appropriate habitat to mitigate for loss of roost sites.</p> | |
| | | <p>If any habitat corridors are found to be severed, identify key locations for replanting to retain commuting routes and if appropriate raise the height of the planting so that crossings are above traffic. If routes are near cuttings provide appropriate infrastructure across the cutting where practical to ensure bats avoid the cut area and being hit.</p> | |
| | | <p>Use down lighters as standard given the very undeveloped nature of the project area.</p> | |

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| | | Replanting trees along the sides of the roads in suitable areas where habitat is to be restored and particularly in key bat areas (0-2km, 13-16km) | |
| | Specific impacts on fish | The Mitigation proposed to prevent the degradation of aquatic will be important to prevent any negative impacts on Fish species, namely the Critically Endangered European Eel. However, on top of this, a key requirement to prevent negative impacts on the European Eel will be to prevent any blockages in the watercourses during construction. Depending on the exact details of the in-channel works, this may involve digging bypass channels to allow water flow, or installing temporary pool fish ladders to allow continued passage. This is only required on the watercourses that have not fully dried up during the time of construction (15 June to 15 October). | |
| Social Issues | | | |
| Labour and Working Conditions Management Plan | Reduction of labour risks (Labour and Working Conditions Management Plan) | The TA will require the Construction Contractor to develop and implement a Labour and Working Conditions Management Plan (LWCMP), with requirements and targets around the hiring of workers from within the local area, to maximise local recruitment.. | Contractor's LWCMP Plan approved by the TA Review and verification by the TA to be complete prior to construction commencing |
| | | The LWCMP will include a Local Content Policy which will include requirements to source goods and services from local businesses. | |
| | | Local communities will be kept informed of upcoming recruitment for the Project and this will be captured in the Project's SEP. | |
| | | The LWCMP will include a plan for the works, based on the identification of key hazards, and ensure appropriate emergency preparedness and response planning. | |
| | | The LWCMP will also include awareness-raising training on the following as a minimum: as well as a description of significant Health, Safety and Environmental risks and impacts related to their work activities; mitigation measures to be implemented when carrying out specific activities; and relevant plans to be implemented | |
| | | The Project commits to ensuring competitive and fair remuneration. Terms of employment and working conditions will be clearly communicated to employees, including length of contracts, hours of work, overtime, wages and benefits, compensation, breaks, and provisions for leave. | |
| | | The LWCMP will also include a Human Resources (HR) Policy which will have clear details about workers' contract periods so that they can prepare appropriately for termination of their employment. Contracts will clearly detail workers' rights and they will be made aware of how to access the grievance mechanism. | |
| | | The Project will take commercially reasonable measures to ensure that contractors are reputable enterprises, with management systems in place to ensure they operate in line with the Project's HR Policy. | |

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| | | <p>The Contractor will adhere to: The World Bank Guidance Notes on 'Managing the Risks of Adverse Impacts on Communities from Temporary Project Induced Labour Influx' 2016, Good Practice Note on 'Addressing Gender Based Violence in Investment Project Financing Involving Major Civil Works WB 2018, 'Addressing Gender Based Violence and Harassment, Good Practice Note for the Private Sector', IFC, EBRD, CDC, (draft,2019) and Good Practice Note on 'Managing Contractors Environmental and Social Performance, ICF 2017'.</p> <p>There will be a Code of Conduct, training and a disciplinary procedure for workers, governing their behaviour and interactions with local communities.</p> <p>There will be clear OHS (Occupational Health and Safety) terms and conditions in subcontractor and worker contracts.</p> <p>Regular audits will be undertaken of all construction sites and accommodation area, to verify the effectiveness of prevention and control strategies. These will also include the contractors and sub-contractors.</p> | |
| Occupational Health and Safety Plan and Procedures | Reduces risk and severity of potential OHS incidents at Project. (Occupational Health and Safety Plan) | The Contractor will develop an appropriate OHS management plan and relevant Procedures, which will include, among others: i) Specific risk assessments of activities (inclusive of all EHSS topics); ii) Specific procedures and operational controls to minimise risks and impacts; iii) Training and competence of personnel iv) Emergency planning v) Welfare provisions (water, sanitation, etc.) vi) Incident reporting and investigation vii) Safety equipment viii) traffic controls ix) Community health and safety | Contractor's OHS Plan approved by the TA Review and verification by the TA to be complete prior to construction commencing |
| Emergency Preparedness and Response Plan (EPRP) | Ensures resources and coordination present to avert or manage foreseeable accidents and emergencies (Emergency Preparedness and Response Plan (EPRP)) | <p>The Construction Contractor will develop an Emergency Preparedness and Response Plan covering at least the following topics: Traffic incidents, fire in RoW, pollution incidents and any further topics identified during detailed design;</p> <p>The Construction Contractor will undertake an assessment of local health care facilities and (in coordination with the relevant health authorities to ensure no exceedances in capacity) develop a plan for their use in the event of an accident/emergency. These details will be captured in the Project's EPRP.</p> <p>An EPRP will be in place for the Project, prior to construction. This will include measures and procedures to manage any traffic and transport related emergencies. Appropriate details will be shared and discussed with local communities and local service providers, as appropriate.</p> | Contractor's EPRP approved by the TA Review and verification by the TA to be complete prior to construction commencing |