ENVIRONMENTAL AND SOCIAL ACTION PLAN – Main Road Reconstruction Project, Rehabilitation and Upgrade of the Danilovgrad – Podgorica road section

No.	Action	Environmental and Social Risks (Liability/Benefits)	To Comply With	Resources, Investment Needs, Responsibility	Timetable	Timetable and Evaluation Criteria for Successful Implementation	Status
PR1	**Assessment and Management of Environmental and Social (E&S) Impacts and Issues**						
1.1	**Environmental/ Social Management System (ESMS)** Develop and implement an ESMS in line with the requirements of ISO14001 or equivalent	Optimisation of environmental and social management though a formalised system.	EBRD PR1 Voluntary and best practice	Own resources, external consultants Cost Assign responsibilities	Oct 2019	TA and the Contractor will need to establish a complimentary organisational structure to implement the ESMS as per PR1, paragraphs 21 and 22. The ESMS will include a section on monitoring the environmental and social performance of the project as per PR1, paragraphs 24 through 27. The ESMS will also include mechanisms to notify EBRD of accidents or incidents affecting social or environmental performance of the project as per PR1, paragraphs 24 through 27 The ESMS will also include mechanisms to notify EBRD of accidents or incidents having a significant adverse effect or significant changes to the project, as per PR1, paragraphs 26 and 27. Annual EHS Report to the Bank.	
1.2	**Monitoring and reporting to EBRD** **1**) Prepare annual monitoring reports that include the status of ESAP implementation, Framework ESMP/Commitment Register and LARP implementation, EHS	Compliance with EBRD PRs	EBRD PRs 1 & 10, Framework ESMP and Commitment Register	TA with support from project implementation consultants	Annual report submissions during the project implementation	Submission of an Annual Environmental and Social Report (AESR) with supplements on implementation progress of the ESAP actions and associated commitments	

	performance, stakeholder engagement activities and resolution of grievances. 2) In addition to the annual monitoring reports, the following reports are required (based on contribution from Contractor and Engineer) during the construction phase only: - Semi-annual environmental monitoring reports on ESMP/commitment register implementation - Semi-annual social monitoring reports on LARP implementation				Semi-annual reports during Construction	Submission of semi-annual reports during construction	
1.3	**Social Manager** TA to hire a competent, experienced, qualified and empowered social manager to have a defined role and contribute to decision making and oversee all social management issues including the development and implementation of the of the LARP and SEP and report internally and externally	Reduce risks related to all social impacts including labour issues and contractor management, economic and physical displacement, and engagement with stakeholder	EBRD PR1, PR2, PR5, PR10	TA social manager salary	Prior to further land acquisition and at least 3 months before construction starts	Appropriate TA social manager hired and able to affect decision-making Monitoring reports indicate effective consultation, disclosure, grievance management with PAPs and completion of negotiated agreements in a timely manner.	
PR2	**Labour and Working Conditions**						
2.1	**Human Resources (HR) Policy** Develop and implement a Human Resources Policy conformant with PR2	Reduction of labour risks Clear communication of requirements to contractors, sub contractors and workers	EBRD PR2 Good International Practice (GIP)	Own resources. Experienced oversight.	2 months prior to signing main contract.	Policy conforms with PR2. Policy is known and understood by TA Project team & senior managers of contractor & main sub contractors. Policy is easily accessible	
2.2	**Contractor and Subcontractor HR Policy**	Reduction of labour risks Enables TA to require improved	EBRD PR2 GIP	Own resources. Experienced	Prior to signing main	Quality rating of contractor's EHS management system.	

	TA to develop and implement a process to ensure that all contractors (and subcontractors) are legal companies and able to comply with HR policy requirements. Contracts to include clauses requiring conformance with HR policy.	contractor and sub contractor performance.		oversight.	EPC contract and subsequent sub contracts.	100% contractors are legal entities. HR policy compliance in 100% of contractor and subcontractor contracts	
2.3	**Contractor Oversight Plan** TA to develop and implement contractor oversight plan to include appropriate monitoring and enforcement of EHSS and Labour requirements in line with the Banks PRs?	Enables tracking of performance against PR2	EBRD PR2 GIP	Own resources. Experienced oversight.	2 months prior to construction commencement.	Monthly oversight reports include relevant information on PR2 compliance. Contractor oversight team has adequate staff and resources.	
2.4	**Security** TA to manage security (e.g. within the Labour and Working Conditions Management Plan) for the Project in line with PR2 requirements and the Voluntary Principles on Security and Human Rights	Reduction of security and human rights risks	EBRD PR2 Voluntary standards GIP	Own resources. Experienced contractor.	2 months prior to tendering for security contractor	Security risk assessment adequate. Security management plan adequate to risks. Security grievances effectively managed.	
2.5	**Collective Dismissals Risk Assessment** TA and Contractor to assess risks of collective dismissals due to subcontractor layoffs (as relevant) and consider use of labour relations professionals and	Reduction of Project risks	GIP	Own resources. IR professionals	At least 2 months before any significant collective dismissals	Unrest avoided during mass layoffs.	

	confirmation of workforce payment prior to closing contracts and final payments.						
PR3	**Resource Efficiency and Pollution Prevention and Control**						
3.1	**Specific Environmental Management Plans** Contractor to develop and implement specific environmental management plans as outlined in ESIA and including -Waste Management Plan -Hazardous Materials Management Plan. -Resource Use Management Plan. -Construction Traffic Management Plan.	Improved management and mitigation of impacts related to waste, hazardous materials and traffic etc.	EBRD PR3	Experienced contractor.	All plans at least two months before construction commences.	Plans will include housekeeping measures in line with GIP to prevent liquids from contaminating soil, ground and surface waters. Traffic management plans will help minimise impacts to local communities and other road users as a result of project construction	
3.2	**Air Quality Management Plan** Contractor to develop and implement an Air Quality Management Plan that includes: - Demolition and Dust Management, - Traffic Management - An air emissions baseline assessment, - Air emissions estimates (modelling of impact), - Sensitivity and vulnerability assessments (linked to Montenegrin or EU standards)	Enable efficient management and mitigation of impacts related to air quality.	EBRD PR3	Contractor.	2 months prior to construction commencing	Plan will minimise impacts from air quality to road users, local communities and nearby ecology.	

3.3	**Noise and Vibration Management Plan** Contractor to develop and implement a Construction Noise and Vibration Management Plan (which includes Noise Monitoring and Mitigation Plans)	Reduce traffic-related noise and air emissions to within acceptable levels	EBRD PR3	Contractor.	2 months prior to construction commencing	No significant impacts from vibration to structure along the Right of Way (RoW) No significant complaints about construction related noise or disturbance during unsocial hours	
3.4	**Blasting Plan (if required)** Contractor to develop and implements a blasting plan if this approach is to be taken during road construction	Improve resource efficiency, reduce risks relating to blasting	EBRD PR3	Contractor.	2 months prior to construction commencing	Any blasting activities comply with regulatory, EBRD and GIP requirements and timed to minimize impacts	
3.5	**GHG Emissions** Contractor to implement EBRD protocol for emission estimate and confirm the risks and impacts associated with GHG emissions. Contractor to develop a mitigation plan if necessary.	Helps ensure clear identification of actions required to reduce risks and impacts associated with GHG emissions	EBRD PR3	Contractor.	2 months prior to construction commencing	Appropriate GHG estimates are available, as required with reference to thresholds. Contractor identifies and carries out measures to improve efficiency of resource consumption and to minimise GHGs.	
3.6	**Water Resources Protection and Management** Contractor to develop and implement water management plans (to include water use and water disposal requirements) and river crossing plans Contractor to develop and implements a water	Enable efficient management of water use and disposal and reduce risk of impacts related to groundwater and watercourses. Reduced risks related to wastewater and contamination to groundwater and watercourses. Reduced risks to water quality by bridge construction	EBRD PR3	Contractor.	2 months prior to construction commencing	No adverse impacts on other water users in the project area Through the cited plans, the Contractor develops design measures to ensure construction effluent and road runoff are intercepted in impervious channels and balancing ponds such that there is no release to surface waters such as streams or onto ground in water protection zones. Accident and spill response measures will effectively deal with any accidental	

	Quality and Water Resources Management plan that incudes pollution prevention and control management along with specific measures to control wastewaters and prevent contamination. Contractor to develop and adhere to a method statement for bridge construction that includes working in rivers. Contractor to include storm water interceptor system and oil/grease traps in road design and construction to meet EU WFD requirements.					spillages or discharges to soil, surface or groundwater. Rivers are not subject to pollution through the judicious use of preventative measures such as silt curtains, flow diversions, slope management, sediment traps etc. No material accidents or discharges that affect water quality significantly.	
3.7	**Waste Management** Contractor develops and implements waste management plan in accordance with Montenegrin Law and PR3	Enables efficient management and mitigation of potential impacts related to waste	EBRD PR3	Contractor.	2 months prior to construction commencing	All waste managed to Good Industry Practice (GIP) and disposed of in accordance with local and national requirements. No significant spills or releases to the natural environment	
3.8	**OHS and Hazardous Materials** Contractor to develop and implement an Occupational Health and Safety Plan to address Hazardous Materials Contractor to incorporates a Materials	Enables efficient management and mitigation of potential impacts related to Hazardous materials.	EBRD PR3 and PR4	Contractor.	2 months prior to construction commencing	Through implementing the plans listed herein (and in 4.1), the Contractor will manage waste in accordance with GIP. No workers will experience inappropriate exposure to hazardous materials from construction, or from the demolition of structures that may contain asbestos, PCBs etc. Contamination of the environment is	

	Management plan as part of the C-ESMP. The demolition and clearance of acquired property will be preceded by the Contractor's implementation of a hazardous materials assessment Contractor disposes of hazardous materials in accordance with Montenegrin law and PR3 requirements.					prevented through hazardous waste management in accordance with GIP. No significant impacts on natural water bodies	
PR4	**Health and Safety**						
4.1	**OHS Management Plan** Contractor develops compliant OHS management plan. The plan should address PR 2 & 4 requirements and include, among others: • Specific risk assessments of activities (inclusive of all EHSS topics); • Specific procedures and operational controls to minimise risks and impacts; • Training and competence of personnel	Reduces risk and severity of potential OHS incidents at Project.	EBRD PR4, PR2 GIP	Own resources, specialist consultants	At least 2 months before construction due to start	Plan includes: Complete Hazard analysis; Appropriate OHS recommendations; Effective training procedures; Adequate monitoring & reporting & incident investigation	

	• Emergency planning • Welfare provisions (water, sanitation, etc.) • Incident reporting and investigation • Safety equipment • Traffic controls • Community health and safety						
4.2	**Subcontractors & OHS Management Plan** Contractor and subcontractors to develop and implement PR2 compliant OHS management plan	Effective safety implementation requires adequate resources, staffing and procedures, as well as appropriate response to unsatisfactory indicator outcomes and incidents.	EBRD PRS 2 & 4, GIP	Own resources, OHS professionals.	Throughout construction regular reports should be provided according to schedule in OHSMP.	All contracts include OHS terms and conditions. All workers receive appropriate training. Audits, indicators and reporting indicate strong OHS management.	
4.3	**OHS oversight** TA OHS oversight is adequately staffed and resourced with at least one OHS Manager. TA also to ensure that Contractor hires at least one OHS manager during construction.	TA is ultimately responsible for OHS outcomes	EBRD PRs 1, 2, 4, GIP	Own resources, OHS professionals	Throughout construction audits and reports reviewed per schedule.	Non-compliance identified in audits and reporting addressed in timely way. Project implemented safely in accordance with PR2 and PR4	
4.4	**Emergency Preparation and Response Plan (EPRP)** Contractor to develop and implement EBRD PR compliant EPRP.	Ensures resources and coordination present to avert or manage foreseeable accidents and emergencies	EBRD PR4, GIP	Own resources, safety and emergency response professionals	At least 2 months before construction commences	Plan conforms to PR2 and PR4 requirements & includes Hazmats, natural hazards, epidemic disease, health service assessment, work and road accidents. Incident reports show effective response achieved	
4.5	**Road Safety** TA to carry out a supplementary Road Safety audit prior to work	Enables proactive identification and changes to improve road safety. Ensures pedestrian users safety	GIP, previous audits	Qualified specialists	At least 2 months before construction and in first 4	Road Safety and Traffic Management Actions are based upon the Road Safety Audit and feedback from stakeholders during consultation.	

	commencing. TA to ensure that all recommendations of the road safety audit have been incorporated into the Project design and that these design recommendations are implemented and installed during construction of the road. Where incorporation of these features has not been possible this should be documented and shared with EBRD for no objection.	improvements and access improvements to adjacent land and properties along the route				months of construction		
4.6	**Traffic Management Plan** Contractor to develop Traffic Management Plan in line with GIP and incorporating as a minimum commitments as per Project Commitments Register	Limits road disruption, outlines road safety requirements		EBRD PR4, GIP	Own resources, safety and transport professionals	At least 2 months before construction commences	Accidents are within normative levels. No fatalities or serious injuries. No major disruptions to normal traffic. No significant access issues.	
PR5	**Land Acquisition, Involuntary Resettlement and Economic Displacement**							
5.1	**Land Acquisition and Resettlement Plan (LARP)** TA to develop and implement a PR5 compliant LARP in line with the Project LARF addressing any outstanding legacy related to land acquisition	Reduce risk of significant harm to small numbers of stakeholders to be physically and economically resettled or with other significant impacts	EBRD PR5	National consultants International consultant oversight	Prior to further land acquisition and at least 3 months before construction starts	Compliant LARP produced on time and on budget. Monitoring reports indicate effective consultation, disclosure, grievance management with PAPs and completion of negotiated agreements in a timely manner. Limited numbers of holdouts and unresolved grievances.		

PR6	Biodiversity and Living Natural Resources						
6.1	**Ecological Clerk of Works (ECoW)** TA will engage biodiversity specialists to oversee the construction works and the BAP. Contractors will engage a Ecological Clerk Of Works (ECoW) to manage day to day ecological issues on site.	Enable efficient management and mitigation of potential construction impacts on biodiversity	EBRD PR 6 EU Habitats Directive Good International practice	TA External Biodiversity experts	2 months Prior to construction,	Suitably competent specialists hired and actively engaged. Biodiversity and habitats protected as per PR6. No significant loss of natural habitats.	
6.1	**Contractor Training** TA and its biodiversity specialists will develop an induction training programme to train all Contractors to ensure that key commitments included in the Biodiversity Management Plan (BMP), Biodiversity Action Plan (BAP), national EIA and Supplemental EIA are implemented in the field.	Enable efficient management and mitigation of potential construction impacts on biodiversity	EBRD PR 6 EU Habitats Directive Good International practice	TA External Biodiversity experts	2 months Prior to construction,	Formal training programme developed All contractor staff understand and comply with ESMP and Project Commitment Plan requirements	
6.2	**Preconstruction Surveys prior to Right-of-Way clearing** TA to ensure that its Contractors' biodiversity specialists perform preconstruction surveys prior to Right-of-Way clearing to confirm the adequacy of proposed mitigation measures identified in the Supplemental ESIA Report, BMP and Biodiversity Action Plan. Where relevant, proposed mitigation measures will be updated included in site specific method statements/project commitments register and implemented by the Contractors.	Enable efficient management and mitigation of potential construction impacts on biodiversity	EBRD PR 6 EU Habitats Directive Good international practice	TA External Biodiversity experts EPC contractors	At least 2 weeks prior to vegetation clearing within the right-of-way / project area	Survey results to be documented in Preconstruction Survey Reports, and where relevant, incorporated into Project Commitment Register	
6.3	**Project Biodiversity Action Plan**	Mitigation and management of	EBRD PR 6	TA	BAP 2 months	BAP implemented in accordance with PR6.	

	(BAP) TA and its biodiversity specialists will update as necessary, Biodiversity Action Plan (BAP). This will build on the Framework BAP included as part of the ESIA package and will be used to enable the project to avoid, minimize and/or mitigate impacts to species and habitats of conservation importance. The BAP will include appropriate biodiversity offset mechanisms to address issues that cannot be mitigated to help achieve No Net Loss of Priority Biodiversity Features in line with EBRD requirements.	potential construction/ operations related impacts on biodiversity	Good International practice	EPC contractors External Biodiversity consultants	Prior to construction,	Priority Biodiversity Features preserved/ protected as per PR6implemented	
PR7	**Indigenous People– not relevant for this project**						
PR8	**Cultural Heritage**						
8.1	**Chance Finds Procedure** TA and Contractor together to develop a Chance Finds Procedure for construction stage in liaison with museum specialists and in accordance with PR8	Archaeological finds from the project affected area can be found in the local museum. Although there are no evidence/ records of cultural heritage along the right of way to date.	EBRD PR8	TA	1 month Prior to construction.	Contractor will need to make the workforce aware of the Chance Finds Procedure. Any finds will be managed in accordance with the procedure and examined and safeguarded by the appropriate museum/ authorities.	
PR10	**Information Disclosure and Stakeholder Engagement**						
10.1	**Stakeholder Engagement** Further develop and implement the SEP as outlined in the SEP documents. This is to include the	PAPs are adequately informed of upcoming Project	EBRD PR10, GIP PR10: Information	Budget for staff, transport, material development etc.	Fully conformant SEP needs to be reviewed 2	Adequate qualified SEP staff hired and present in field. Indicators identify emerging issues and	

	hiring of a Social Manager to update/maintain and implement the SEP. TA to ensure Contractor (and subcontractors) transpose relevant elements of the SEP into their own plans of work, as reflected in contractual agreements.	actions and can participate in mitigation designed to protect them from impacts. Emerging issues can be identified and responses implemented before the issues escalate. Loss of social licence to operate	Disclosure and Stakeholder Engagement. Montenegrin Law on Environmental Impact Assessment (EIA).	TA Contractor Social Manager to ensure contractual requirements for implementation of relevant SEP actions.	months prior to construction commencing. Implementation: All Project Phases	allow timely responses. Achievement of the goals and objectives of the SEP. Stakeholders proactively and robustly engaged in the process as outlined in the SEP	
10.2	**<u>Grievance Management Process (GMP)</u>** Review and improve the Grievance Management Process by: • Consulting on GMP design with PAPs and revising the process so that it is trusted, effective and used. • Reviewing staffing and resourcing. • Reviewing and updating indicators and monitoring frequency.	An effective feedback channel exists to allow the Project to identify and address emerging issues.	EBRD PR10, GIP	Included in SEP	Ongoing, to be completed as a matter of urgency minimum by October 2019	GMP is known and trusted by majority of PAPs. GMP is used as a primary channel for raising issues by PAPs. Grievances resolved in a timely manner to the satisfaction of PAPs in accordance with PR10 paragraph 28.	