Appendix B) Environmental & Social Management and Monitoring Framework; Detailed Commitments Register

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1. Introduction

This appendix presents the Environmental and Social Management and Monitoring (ESMM) commitments framework, and provides a reference point and scope for the development of a detailed Environmental and Social Management and Monitoring Plan (ESMMP) for the Project. The ESMMP will be further developed and implemented by the TA and Contractor(s) to manage environmental and social risks associated with the construction and operation of the Project. An example template for a generic management plan structure is provided in Appendix A.

The ESMM framework has been developed to demonstrate how the Project intends to fulfil the requirements presented in the EBRD Performance Requirement 1 (PR 1), Assessment and Management of Environmental and Social Risks and Impacts. The ESMM framework content has taken into account the required management, mitigation and monitoring measures as identified in the ESIA, and the other Project Standards that are referenced within it.

1.1 Purpose of the ESMM Framework

The ESMM framework, and subsequent ESMMP, provides the structure to enable environmental and social (including community health and safety) risks to be identified and assessed throughout construction and operation, and mitigation measures to be developed, implemented and appropriately managed. The ESMM framework will therefore assist the TA to comply with relevant authorizations, legal requirements, and EBRD PR's in a systematic and structured way.

1.2 Scope of the ESMMP

The ESMMP will be developed specifically for the Project based on this ESMM framework. The ESMMP will cover all activities conducted by or on behalf of the TA on the Project site, including those of contractors. The ESMMP provides for the management of significant environmental and social risks, incorporating the community as well as the health and safety of the Project personnel, contractors and visitors. The ESMMP is a dynamic document, and will therefore be reviewed and updated from time to time to continually improve the management of environmental and social impacts. Changes may be based on the Project phase, the environmental and social performance of the Project, or updated to reflect changes in operations, the receiving environment, legislation, stakeholders, and personnel.

2. Project ESMMP

2.1 Roles and Responsibilities

The effective implementation of the ESMMP 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 operation phases, while being reviewed on a regular basis to adapt as necessary. The key roles and responsibilities are outlined below.

2.1.1 Project Manager

The Project Manager (PM) is the senior representative for the Site and, as such, is the ultimate authority on all matters including environmental and social management. The PM will be appointed by the Consortium. The objective is to actively work towards the elimination of Company and Sub-contractor environmental damage. The PM is responsible for providing the human and financial resources necessary for ensuring compliance to the ESMMP. 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).

2.1.2 Site Manager

The Site Manager shall be responsible for the day-to-day operations of the Contract and may deputise for the Project Manager if required. 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 ESMMP.
- Advise or instruct any person on site in matters related to environmental, social, health and safety management.
- To attend environmental 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 (the responsibility for the grievance mechanism will be outlined in detail in the 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.

2.1.3 Environmental, Social, Health and Safety Manager

The Environmental, Social, Health and Safety Manager (EHS) Manager will be responsible for the day-to-day environmental and social management during construction. The EHS Manager is responsible for implementing the monitoring programmes and maintaining the monitoring databases as well as the reporting of the results.

2.1.4 Community Liaison Officer

The Community Liaison Officer (CLO) also referred to as 'Social Manager', will be appointed by the TA and will be responsible for grievances, and will hold/own a 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.

2.1.5 Employees

Key responsibilities of each Project employee include:

- Reading and understanding the requirements contained in this ESMM framework and ESMMP;
- Attending EHS 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 Consortium management on environmental, social, health and safety related measures;
- Adhering to safety rules at all times;
- Specific responsibilities as defined by the ESMMP;
- 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 EHS rules at all times.

3. Contractor Management

A Contractor Management Plan will be developed and the management and mitigation actions identified in this document will form part of this plan.

3.1 Inspection, Monitoring and Audit

Inspection and monitoring of the environmental, social, health and safety impacts of the Project activities will increase the effectiveness of the ESMMP. 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 HSE staff in coordination with contractors and any other external agencies identified. The entire process of inspections and audits should be documented. The inspection and audit findings are to be implemented by the Project staff in-charge in their respective areas.

3.2 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 EHS performance reports (weekly, monthly, quarterly, half yearly, yearly etc.).

3. 3 Documentation and Record Keeping

Documentation is an important step in implementing the ESMMP. The Consortium will establish a documentation and record keeping system to ensure recording and updating of documents. Responsibilities have to be assigned to relevant personnel 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.

3.4 External Reporting and Communication

The EHS Manager is the responsible person 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 EHS team.

3.5. Internal Reporting and Communication

Inspection and audit findings, along with their improvement program, 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.

3.6 Review and Amendments

As previously mentioned, the ESMMP acts as an environmental, social, health and safety management tool which needs to be reviewed periodically to address changes in the organisation, process or regulatory requirements. Following a review, the EHS Manager will be responsible for making the amendments in the ESMMP and seeking approval from the Project Manager. The amended ESMMP will be communicated to all staff to which changes are relevant.

4. Project Plans

The ESIA process has identified plans (and policies) that will be prepared by the TA and its chosen contractor prior to the commencement of construction as part of an integrated ESMMP system. Some of these plans maybe combined where appropriate, and some of the plans may need to be updated on the basis of those plans already provisionally developed as part of the ESIA;

- Biodiversity Management Plan

- 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
- River Crossing Plan
- Construction Traffic Management Plan
- Construction Noise and Vibration Management Plan
- Blasting Plan Bo
- Chance Finds Procedure
- Labour and Working Conditions Management Plan
- Emergency Preparedness and Response Plan

In addition, the following documents have been developed (and disclosed) and will be further refined as the project progresses):

- Biodiversity Action Plan
- Stakeholder Engagement Plan.
- Land Acquisition and Resettlement Framework

4.1 ESIA Commitments and Actions

The Table 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 ESMMP and related plans and policies. Whilst all commitments are the direct accountability of the Contractor, accountability for ensuring that they are undertaken in a timely manner remains with the TA. All actions are to be outlined further in the project plans as scheduled in the ESAP.

Requirements	
1	**Commitments to be included in a Construction Environmental and Social Management Plan**
1.1	The contractor will be required to develop and implement environmental and social management and monitoring plans covering both the construction and operational stages of the Project.
2	**Commitments to be included in a Biodiversity Management Plan and Biodiversity Action Plan**
2.1	Pre-clearance site surveys will map sensitive areas and apply additional mitigation where required. Construction camps will be located away from sensitive areas. A hunting ban(including fishing) will be in force for construction workers. Speed limits on vehicles and restriction to existing and/or dedicated haul routes will prevent direct mortality and disturbance from vehicles during construction.
2.2	Pre-clearance site surveys combined with the demarcation and treatment of non-native species will prevent their spread. Monitoring post-construction will ensure that newly restored areas are not colonised by non-native species from adjacent areas.
2.3	In the most sensitive habitats and species, works will be confined to the least sensitive timeframes. Monitoring by the Ecological Clerk of Works (ECoW) will also ensure that should valuable species be breeding in an area, works do not take place during these sensitive times i.e. for birds that the young have successfully fledged or that fish have successfully spawned.
2.4	For particularly sensitive areas near watercourses bespoke mitigation and monitoring by the (ECoW) will be used to minimise the risk of significant effects. ECoW should advise on particularly sensitive areas deposition and salt spray should be monitored.
2.5	For areas of temporary land-take, pre-works surveys will be used to confirm baseline conditions to which habitats should be restored post construction. Whilst this will minimize long term impacts, some short-term degradation and disturbance will be inevitable whilst mid-term loss will occur in areas that, once replanted, take time to mature (e.g. forest). Additional mitigation may be needed to compensate for this
2.6	At water crossing points appropriate pollution prevention measures will be put in place at each crossing and

	vegetation cover will be retained on the banks where possible to retain habitat and minimize soil exposure. Silt fences will be used to prevent silt from travelling downstream, and banks will be restored to pre-construction contours to the extent practical using temporary erosion control measures (such as straw bales, silt fence, etc.). Pre-clearance site surveys will map sensitive vegetation for restoration and reinstatement of banks will use mid-term soil stabilization measures (if required) such as willow revetments, gabions and/or geo textiles membranes to retain soil until the vegetation has established.
2.7	Should the ECoW identify any particularly areas sensitive to dust, deposit gauges will be implemented to monitor the dust and further appropriate action taken if required.
2.8	Good site practice regarding the storage of waste and materials will be implemented.
2.9	A monitoring report and hazard map will be prepared of sensitive locations by the EcoW and shared with workers so that sensitive areas can be avoided or bespoke mitigation implemented.
2.10	The EcoW is to ensure that habitat degradation is minimized and baseline data for the species BAPs (Biodiversity Action Plans) is obtained. Prior to any enabling works site survey, mapping and/or demarcation of non-native invasive species will also be required.
2.11	The works footprint will be reduced as far as possible e.g. through the use of a single vehicle track policies and use of low-impact vehicles where practical.
2.12	Off-road travel will be prohibited where practical, with laydown areas and compounds to be situated to avoid unnecessary clearance of vegetation. Natural breaks in vegetation will be used as preferred access routes where possible.
2.13	Temporary barriers are to be used to prevent wildlife from accessing waste disposal areas and similar areas.
2.14	Any reseeding or replanting of selected areas to be restored will use locally collected seed mixes and saplings. A local source of indigenous saplings suitable for replanting programs will be identified in advance to facilitate restoration. All efforts will be made to minimise removal of mature/significant trees and maintain connectivity between areas of forest habitats.
2.15	Soils will be removed as subsoil and topsoil and these will be stored separately as per good working practice for subsequent restoration.
2.16	Workforce will be educated on preventing bush fires and this will not be used as a land clearance method.
2.17	Works will be minimised within riparian areas to safeguard aquatic organisms and at crossing points across rivers works will conducted where there is clear access to the banks to minimise vegetation clearance. The ECoW will determine for which riparian works a site-specific method statement is required.
2.18	Standard pollution control measures will be implemented in all sites (e.g. to prevent silt contamination water will be kept out of the works area using appropriate isolation techniques, such as coffer dams, silt fences and by-pass channels)
2.19	Demarcation and offsets for camp and storage locations and field activities will be at least 50m from watercourses where practical. Erosion control using 'polders', pads of plants and geo-nets will be implemented. Where trees have to be removed to facilitate the crossing, these will be replanted with a similar species composition.
2.20	The location of sensitive species identified by the EcoW will be reported to the workforce appropriately. The EcoW will be present during commencement of all works to conduct pre-construction checks and prevent animals present within the working area being killed or injured during the works. Checks will be for all vertebrate species including ground nesting birds, reptiles, amphibians and bats, amongst others. Checks will include within hollow trees and other places of shelter.
2.21	As far as possible tree and scrub clearance will not be undertaken during the breeding bird season (March to August inclusive). Should clearance during this time be necessary a pre-clearance nesting bird check of the vegetation to be cleared will be undertaken by the EcoW and a decision on whether to move the nest or defer the clearance will be made by the ECoW.
2.22	Works will not be lit where this is practical. Where lighting is required it will be directional and the lighting strategy will be designed with the input of the ECoW. Only non-UV lighting sources will be employed.
2.23	Pits and excavations will be filled in as soon as possible following works. Trenches and pits to be created for longer than 48h periods will have 45O ground ramps to allow escape by fauna should they fall in. A pre-start check for fauna will be completed prior to works commencing in the morning if trenches are left open overnight. Regular crossing points will be installed to ensure wildlife can cross excavations, berms and drainage channels.
2.24	A site wide ban will be placed on workers bringing vegetation or soil from outside the site area to prevent dispersion of non-native invasive species.
2.25	Wash down of all vehicles and equipment before entering the sensitive sites. Follow species specific mitigation regarding invasive species which includes demarcation and avoidance.
2.26	Mitigation for unplanned events will include training of staff in: 1) the sensitivities of the habitats and species in the area via toolbox talks including health and safety recommendations regarding poisonous or otherwise dangerous plants or animals, provided by the ECoW 2) Prevention of accidents by adhering to good practice behaviour throughout the works 3) Delegating authority to a EcoW whose job it is to ensure compliance of the

	required mitigation 4) Training in immediate response to bush fire, spillages etc. 5) Emergency numbers provided for ECoW should protected species be found on site in the absence of site supervision. The EcoW will be present at all times if works need to take place in particularly sensitive areas.
2.27	Otter habitats and lying-up sites are subject to change over time and further surveys will be conducted in 2019 and immediately prior to the start of construction. This will involve surveys of all watercourses within 100m of the alignment for signs of otters including holts and couches. If any otter lying-up sites are found, mitigation will be adjusted as required. If any holts or couches being used for breeding are found all works in that area will need to be suspended until the cubs have left the holt/couch. Where otters are confirmed to be present, annual post-construction monitoring is proposed for five years to confirm whether the mitigation measures have been effective or if any alterations and/or enhancements are necessary.
2.28	Immediately prior to construction, for every river crossing or activity within a river there will be a pre-enabling dedicated survey to confirm absence of holts or other resting features within the direct zone of impact of the works. If features are found, exclusion of the features will be ensured prior to works commencing. During works within rivers, movement through the works area by otters will be permitted over the banks.
2.29	Holes/pits will be covered at night or mammal ramps positioned to allow any trapped animals to escape.
2.30	Night working will not be permitted where the proposed scheme comes within 30m of any watercourse where otters may be present to reduce the risk of otter being run over by construction traffic.
2.31	Otters to be excluded from dangerous areas by erecting temporary otter proof fencing where they are present (whilst avoiding otter commuting routes). Fencing may be e.g. chestnut paling fence with stakes at 25mm gaps or stiff plastic mesh that otters cannot scale. Temporary fencing to be positioned to guide otter to safe routes through the working areas. This may include underpasses for site access and haul roads, (min internal diameter > 600mm)
2.32	Construct watercourse crossings to enable safe passage of otters. All bridges or buried structures will have sufficient space between the abutments and the watercourse to enable otter to pass safely during high water levels. Provision will be made for otters to gain access to the water at such structures and ledges will be incorporated in the bridge design as appropriate. The proposed scheme is not expected to cross any smaller watercourses at grade. Should this change, and otters be considered likely to be present continued, access along the watercourse would be maintained through the use of appropriate culverts.
2.33	Compounds etc. to be sited at least 30m away from watercourses and to avoid nearby areas of woodland, dense scrub and/or wetland.
2.34	After temporary loss habitat to be returned to its former quality or better (habitat creation for other species groups will also support otter where close to waterbodies).
2.35	Reinstate any realigned sections of watercourses to as near as natural as possible or create new channels with meanders and riparian
2.36	Consider planting of trees such as willow, oak and ash along riverbanks and encouraging dense scrub nearby. Fence off overgrazed areas of land near watercourses to encourage vegetation growth. Where mature trees along riverbanks need to be removed, retain the root systems where practical to provide potential holt sites.
2.37	Where works result in damage to river and stream banks, protect them by piling large concrete blocks to create attractive cavities for otter (in areas where the safety of otter can be assured by restricting their access to the carriageway).
2.38	Construct bridges and culverts where the road dissects watercourses to allow safe passage of otters during spate conditions, (presence to be confirmed by the ECoW).
2.39	Should extensive stretches of road be fenced, install dry underpasses to enable otter to move between habitats.
2.40	During construction of bridges and other structures one side of the river or stream being bridged will remain intact for as long as possible to provide safe access, and the area around the water course to be disturbed will be minimised by the provision of temporary barriers and safe working areas.
2.41	If lighting is used it should be shone away from the river during construction at dusk or in the morning. Or if needed in the river it should use shrouding to ensure that not all the river is lit up and passage along it is still possible in unlit locations.
2.42	Provide relevant contractors with an overview of otter ecology prior to works commencing. Any holts and couches to be identified to contractors in confidence to ensure that they are not accidentally disturbed and marked so that contractors must not enter. Site clearance must be preceded by a thorough survey of the area for holts, couches and otter, and once completed working areas in suitable habitat must be fenced to prevent otter returning. If a holt or couch is discovered during construction, an exclusion zone of 30m must be established and all works suspended. If an occupied breeding site is found, it may lead to the cessation of work for up to 10 weeks until cubs are mobile and able to leave the area. Night working (one hour after sunset to one hour before sunrise) will not be permitted where the scheme comes within 30m of a holt/couch or watercourse in order to prevent disturbance to otter and their routines.
2.43	Planting of natural screens along the scheme which will reduce noise and light disturbance to otter which could come as a result of operational traffic. Areas of lighting should be low where the operational scheme crosses or runs parallel to watercourses thus reducing disturbance to otters.

2.44	Contractors to adhere to pollution prevention GIP, as outlined in relevant guidelines on eg: Prevention of Water Pollution; Use and Design of Oil Separators; Works In, Near, or Liable to Affect Watercourses etc.
2.45	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.
2.46	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.
2.47	Where practical avoid felling trees between April-August.
2.48	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.
2.49	Installing of bat boxes within appropriate habitat to mitigate for loss of roost sites.
2.50	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.
2.51	If routes are near cuttings provide appropriate infrastructure across the cutting where practical to ensure bats avoid the cut area and being hit.
2.52	Use down lighters as standard given the very undeveloped nature of the project area.
2.53	Further information is required as a priority for bat species from the EcoW to determine the extent to which species-specific BAPs are required to mitigate impacts.
2.54	In areas with known newt or reptile populations or suitable habitat the application of newt/reptile fencing around the road and the use chippings or very short vegetation should be implemented to discourage animals from going onto the road.
2.55	In addition the riparian vegetation along the Mareza, Sitnica and Susica will be restored and this and other riparian areas will be vegetated with native plant species that are attractive to local fauna and with plantation patterns designed to lead the animals towards the wildlife crossings
2.56	All areas temporarily effected by construction must be rehabilitated. The rehabilitation program should incorporate a wide variety of species typical of the regional ecosystem. The species composition for rehabilitation will depend on the type of ecosystem in question.
2.57	Arrange construction sites (2 and 3) to reduce risks of construction impacts such as fuel spills, oil spills, hydraulic oil spills, inadequate and unprofessional use of the planned landfills, scattering of material, different types of waste on the surrounding swampy and aquatic habitats (habitat types 3150, 6420, 95A0).
2.58	Enabling and construction works should be carried out in the access road corridor (service road) so that the natural morphology of habitats is degraded to the smallest possible degree and in order to ensure preservation of autochthonous flora and vegetation.
2.59	Retain existing vegetation, especially the border trees on river banks – habitat type 92A0, wherever practical.
2.60	Clear vegetation cover in the areas around bridges (Susica, Matica-Sitnica) and in the area from the Matica Bridge to Komanski Bridge (habitat type 92A0) carefully ideally during the dormant period (from 1st October until 15th March).
2.61	Carry out works in watercourses during the time of the year when water levels are minimal, (mid June-mid October) while making sure that the riverbed is preserved in its natural relief. Avoid destruction of riverbed and divert streams to minimise negative impact on aquatic flora and fauna.
2.62	Material generated during excavation should be used for construction of the necessary infrastructure and for landscaping the areas along the road. Excess earth material should be deposited in line with the regulations at pre-designated locations (Contractor should sign the agreement with the local authorities), and the surrounding habitats may not be covered with this material (especially Susica, Matica-Sitnica and swampy meadows). Hummus should be deposited at a temporary storage area and then laid out again as the upper layer during rehabilitation of the surrounding area. This will be managed through a Soil Quality and Erosion Control management plan.
2.63	During the process of carrying out excavations along Susica, Matica-Sitnica, drilling the riverbed for the purpose of placing piers, blasting the surrounding hills and building reinforcement walls, the physical parameters (turbidity) and chemical parameters (PH, O2 saturation) should be regularly checked in specialised laboratories (habitats type 3150 and 3260).
2.64	In case of identifying invasive species, such as: Ambrosia arthemissifolia, Ailanthus altissima, Xantium sp., they should be immediately removed.
2.65	Areas from which vegetation is going to be cleared for the purpose of enabling works and using access roads should be restored into their original condition. All locations along the Matica-Sitnica River which will be subject to significant degree of clearing (eg habitat type 92A0), should be subject to biological restoration, whereby this process should be carried out by planting autochthonous tree species (narrow-leafed ash, black poplar and willow).
2.66	Riverbanks will be reinstated to their original profile, with the aid of gabion baskets or rip-rap if this is necessary to prevent erosion. Soft engineering techniques would be preferable.
2.67	Tree planting will use two -year pot grown trees of local provenance. Seeding will be from seeds gathered from the local vegetation. A technique that is both cheap and effective is the laying of hay cut just before grass

	seeds drop on the areas of bare earth.
2.68	At all sites GIIP practices will be employed such as the use of an ECoW, checking of trees to be removed for bats and nesting birds (and avoiding their removal until hibernation or nesting is finished), and work on bridges to focus on the dry period. Large trees and bat roots will be inventoried and where practical mature trees (eg oak and walnut) will be retained with compensatory planting also undertaken for any trees to be cut down.
2.69	Machine operators and blasters should be made aware of the sensitivity of the area and trained to identify potential consequences of their actions such as wildlife disturbance, developing of karst features (sinkholes, caverns), and hydrologic disturbance.
2.70	Care will be taken to avoid nesting birds during construction. Habitats of greater importance will be marked out for particularly sensitive works. These will include parts of river corridors along the Sitnica river and Zeta river (Curilac), as well as reed beds and flood meadows in the area of Mareza and Luznica.
2.71	Fragmentation of grassland habitats will be avoided to prevent impacts to ground-nesting species. Access roads will be clearly defined before commencement of works.
2.72	Works will be planned during the period of reduced activity of birds, or in the period outside the reproductive season. The optimal period is after the reproductive season, from the end of August, or before the beginning of the reproductive season in April. Works related to changes in the riverbed will be undertaken where practical at the period of the lowest water level, i.e. after the nesting period which occurs during the end of July.
2.73	Lighting will be minimised as far as practical whilst taking account of safety requirements. Cut-off lighting will be used and mercury and halogen lamps will not be used.
2.74	Vegetation along the road will be cut down and cleared (in the zone from 3 to 10 m) to reduce the attractiveness of the habitat for certain mammals, and increases the transparency of the terrain and visibility for drivers. This is also for operations.
2.75	Culverts will be planned for passages for animals using expert recommendations in places that have been determined as important in terms of habitat conservation and increased mortality due to collision. During the construction of passages, it is necessary to preserve the surrounding flora in order to enable the natural movement of animals towards passage.
2.76	Install traffic signs and signalling for the drivers (blinking mark) with animal signs at locations which have been determined as important for mammals through the study.
2.77	On bridges and under bridges ledges will be provided for movement of small mammals and otters (during high water levels as well).
2.78	Install a temporary fence around the construction site in places that the study has defined as important for mammals, in order to prevent their entry during the night (2m-high fence should be planned within the Site Organization Plan).
2.79	A wildlife crossing for B. bufo will be built at the ch. 119 + 662.560. The crossing should be made from 30x30cm polymer-concrete which can easily be installed on the road, providing that the top edge of the tunnel is in line with the asphalt and that the tunnel provides conditions for passing of light, air and water. Direction guides should be placed next to the opening – fences which guide the amphibians and prevent them from accessing the road. The fence should be 30-50 cm high, and it should have a rounded top section so that the animals cannot climb over it, but so that it still ensures that the animals which accidentally reach the road can easily cross over the fence. Additionally, it is required to transport the animals across the road route during the migration season.
2.80	Use of heavy machinery will be strictly limited to the Project RoW to avoid additional fragmentation and degradation of habitats, as well as subsidence of soil.
2.81	Wastes, including spoil, must not be deposited along the riverbanks, creeks, channels, or in swampy areas. The Law on Waste Management will be complied with.
2.82	Areas which are temporarily used during construction will be backfilled with soil, which would enable reinstatement of autochthonous vegetation and reptiles, as well as uninterrupted spring and fall migration of amphibians.
2.83	Special attention should be paid to preserving the swampy area between the Matica Bridge and Luznica Hill to the greatest possible extent. This area is located 60m away from the project impact area. Thus, it is suggested to place info boards which will provide information about representation of the endangered species in the subject area, and thus make it clear to the construction workers that the works, i.e. operation of machinery must take place in the designated area.
2.84	Bearing in mind that it is planned to carry out reconstruction of the culvert at the location of the existing one (Ch. 117 + 864 290), soil and material should not be deposited in proximate vicinity to the channel, whereby any possible intentional or unintentional filling of the channel must be avoided. The channel should be protected during the construction phase. It is suggested to make a culvert which will enable passage of both the aquatic and terrestrial animals, while providing elevated plateaus for passage of animals along each side of the culvert.
2.85	Place a thick protection fence at locations where a significant rate of Hermann's tortoise roadkill was recorded (from the Ch. 120+513.59 to Ch. 121+004.60). The fence will need to have the following dimensions: 10 x 10 mm, 50 cm (height) – including 10cm which would be founded into the ground.
2.86	Provide temporary site drainage channel to avoid erosion and environmental impacts.

2.87	Wastewater treatment should be carried out via the system for additional treatment and drainage, which operates through the precipitator and separator.
2.88	Avoid turbidity impacts through use of sedimentation or infiltration method.
2.89	During reconstruction of the bridges, protect the riverbed and carry out the works when water levels in the watercourses are minimal (mid June – mid October).
2.90	Prevent wastewater inflow, which should be done by installing special drainage channels, while wastewater should be treated via the precipitator and separator.
2.91	National legislation requires provision of conditions for fish migration to ensure that fully mature species can migrate during winter for spawning. Bridge works should occur outside of the key wet seasons of November-February and at all such times fish should be able to pass up permanent rivers. "Pool" fish ladders may need to be constructed at Komanski Bridge and Matica Bridge (to be advised by ECoW). Construction of a fish ladder is not required at the location of Susica Bridge, as these activities will be carried out during summer, when there is no water running under the bridges.
2.92	Monitoring should be undertaken of fish populations. Improvements in fish stock by adding trout should be considered only if monitoring indicates long-term impacts on fish populations (also important for otter food).
3	**Commitments to be included in a Water Resources and Water Quality Management Plan and River Crossing Management Plan**
3.1	In areas where dust suppression measures will be utilised to control air quality impacts, crushed rock embankments must be installed to intercept run-off and protect rivers from sediments suspended in the run-off. The design of the embankment will be developed by the Contractor and its permeability and dimensions will be appropriate to prevent suspended solids from directly entering rivers.
3.2	The Contractor will ensure all relevant permits are in place for water and power supply, to ensure there is no interruption to local supplies.
3.3	Further soil quality surveys and assessments will need to be undertaken along the road route to ascertain whether there are additional areas of soil contamination that could be exposed during construction activities, especially given existing sources of soil contamination located along the road route in the form of re-fuelling stations.
3.4	Any contaminated soil identified should be dug out and removed to an appropriate licensed landfill site. This should prevent any leaching of contaminants from contaminated soils into underlying groundwater.
3.5	Soil quality surveys should therefore be undertaken along the road route to ascertain whether contaminants such as chromium are present.
3.6	During the operational phase, regular groundwater quality monitoring is recommended to ensure that run-off from the road is not leading to elevated levels of any contaminants in groundwater supplies.
3.7	Design will need to ensure that return period (1 in 100 yrs) will allow for elevated flood discharges. Flood control measures may also be required along riverbanks up and downstream of new in-river structures.
3.8	Handling of fuel, lubricants, oils and chemicals should take place in secure, bunded areas.
3.9	Spill kits should be provided to clean up any polluted soils resulting from minor spills of fuel, lubricants, oils or chemicals.
3.10	Fuel, oil or hazardous materials required to be stored, should 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 should be constructed of concrete or other suitably impermeable material. No drains from the storage area should be installed.
3.11	On-site vehicles and equipment should be inspected regularly for leaks and all leaks shall be immediately repaired. Incoming vehicles and equipment should be checked for leaks. Leaking vehicles/equipment should not be allowed on-site.
3.12	All exposed soil and any soil stockpiles should be covered to prevent erosion run-off of mobilised suspended solids, or turfed with grass.
3.13	Washing of construction equipment or vehicles should be forbidden within 100m of a watercourse.
3.14	Construction equipment and vehicles should not be re-fuelled within 100m of a watercourse and re-fuelling should be undertaken on an impermeable surface.
3.15	Secondary containment devices (drop cloths, drain pans) should be used to catch leaks or spills while removing or changing oils from vehicles or equipment. For small spills, absorbent materials must be used.
3.16	Soil stockpiles should not be higher than 2m or have slopes greater than 25^{o} to prevent run-off of sediment.
3.17	Drip trays should be placed beneath all high-risk equipment to contain spills/leaks of fuels/oils.
3.18	The discharge of any untreated wastewater into a surface water body should be prohibited.
3.19	Treated wastewater discharges should comply with specified water quality standards (including Project and national standards). Construction waster waters to be collected in septic tanks and taken to the municipal collector for further treatment.
3.20	Discharge of cement contaminated water-to-water bodies should be avoided in line with GIP, as cement pollution results in high alkalinity and raises the pH, which can be toxic to aquatic life.

3.21	All materials should be stored above flood level.
3.22	No more than 100 litres of fuel, lubricant or any other hazardous materials stored at any one point in the Right of Way
3.23	Bridge construction activities should be undertaken when rivers are dry (i.e. during the summer months) to avoid silt pollution.
3.24	If bridge construction works cannot be avoided when there are flows in the river, appropriate isolation techniques should be employed i.e. the installation of a coffer dam, to keep water out of the works area and controls installed downstream of the works to trap sediments such as silt fences, rock groynes, geo-fabric barriers and hay bales. In addition, turbidity should be monitored daily if sensitive biodiversity or human receptors are present, immediately upstream and downstream of the work site. If turbidity levels are shown to exceed specified Project standards, the operations in the river should cease until the river is flowing more clearly again.
3.25	Spill kits should be provided for all worksites around rivers.
3.26	Vehicle refuelling should not occur within 100 meters of any surface watercourse.
3.27	No waste materials should be dumped in the river, including concrete debris.
3.28	Generators should be located more than 20 meters from the river on impermeable surfaces.
3.29	No concrete waste from concrete mixers should be dumped in the river.
3.30	Areas where concrete mixers can wash out leftover concrete without polluting the environment should be provided. This may be in the form of a lined settling pond at each bridge site.
3.31	No hazardous liquids should be placed within 20 meters of the river.
3.32	Portable toilets should be provided at bridge construction sites.
3.33	A soil quality assessment will be undertaken to identify any existing areas of soil contamination. Any contaminated soil must be excavated and removed from the site to an appropriate licensed landfill.
3.34	The storm water drainage system will not discharge untreated wastewater directly into local rivers.
3.35	Any water required for construction activities will be provided by tanker from the local municipal supply.
3.36	A water quality baseline and flow duration curves for all rivers to be directly affected by the Project will be established prior to construction commencing.
3.37	A blasting plan will be produced.
3.38	An assessment of afflux resulting from the introduction of new bridge structures in rivers and how this will impact on local flood risk will be undertaken.
3.39	A Water Quality Management Plan will be developed which will include Pollution Prevention and Control Management
3.40	A Construction and Operational Spill Response Plan will be produced.
3.41	A Method statement for bridge crossings will be produced.
3.42	A Construction and Operational Emergency Preparedness and Response Plan will be produced.
3.43	Some 31 oil and grease separators/filters will be included into drainage design to treat water in line with the SIST-EN 858-1 standards. Separators will generally be located in the central reservation (except for 3 which will be placed between the road and the sidewalk).
3.44	The detailed design (and proposed operation) of the storm water drainage system will ensure that water will not be discharged into rivers without adequate treatment and where the points of discharge will be.
4	**Commitments to be included in a Soil Quality and Erosion Management Plan**
4.1	Complete topsoil material which will be removed during highway construction should be used for highway side slopes. It would be the best to embed the humus material without previous storage. If the storage is necessary, it must be provided on regulated dumps and based upon principles of humus material conservation
4.2	Take into consideration maximum slope degree on which vegetation can be naturally maintained during the covering of side slopes and embankments. Under the steeper slopes soil should be firmed with wire mesh and grasses and autochthonous bushes should be grown below it.
4.3	Sand and borrow pits can be opened and reclaimed only in accordance with the biodiversity action plan requirements. Protected habitats, fertile, arable and similar areas should not be used as a landfill locations.
4.4	After embankment construction, all mechanization, construction material and containers should be taken away, and any open soil areas should be revegetated using approved species.
4.5	The impact of the excavation works to remove the solid (Karst) geology on the hydrogeology needs to be assessed. This would be undertaken before finalisation of the design and any potential impacts taken into account and mitigated for.
4.6	The contractor will ensure that the following recommendations are carried out as detailed in the ESIA environment and social action plan
4.7	In accordance with the mitigation hierarchy specific plans will address identified potential impacts. These include the following: Waste management plan, Hazardous Materials Management and Spill Prevention Plan,

	Method Statements, River Crossing Plans, Soil Quality and Erosion Control Management Plan
4.8	A competent expert (defined as a person or organisation with proven experience in the development of environmental management plans) shall be used to draft the requirements necessary for ensuring the environmental robustness of the erosion control plan, hazardous substances control plan, waste management plan and any other environmentally focused management plans.
4.9	A full time environmental supervisor will be appointed to oversee the delivery of the management plans.
5	**Commitments to be included in an Air Quality Management Plan**
5	Prevent the uncontrolled spreading of construction material (in particular dust) outside of the construction zone then vehicles will be cleaned and inspected as clean;
5.1	Regular wetting of dusty areas when the weather is dry (and predictions made in advance of the weather for the coming week to avoid situations where equipment is not available for wetting);
5.2	A construction traffic management plan will be developed that will address issues of; the location of haulage routes, driver conduct (speeding) and the prevention of vehicle idling
5.3	There is a duty on the Contractor to ensure the health and safety of the workforce and safe appropriate disposal of materials. Dust, demolition and disposal management will be required, informed by an inventory and characterisation of demolition targets. Due diligence of the potential impact of the demolition works is required.
5.4	An air quality baseline assessment will be completed prior to the commencement of construction works. This will be completed by a competent expert (see note below) and will be delivered to GIP. Any limitations to this (for instance those related to a reduction in duration of monitoring) will be clearly listed out in the report and an assessment made of their relevance to the final identification of impact
5.5	Predictive modelling of air quality impacts will be completed using the output from the baseline assessment. Potential impacts will be confirmed (and limitations detailed)
5.6	The contractor will ensure that the recommendations are carried out as detailed in the ESIA environment and social action plan (ESAP)
6	**Commitments to be included in a Waste Management Plan**
6.1	According to the Law, the Contractor is obligated to arrange transportation and final disposal of all the surplus material to a location that must be licenced by the local authority. It is currently proposed that this waste material will be transported to the nearest landfill (located at a distance of up to 25 km). The contractor is obliged to arrange landfills at a location approved by the Supervising Engineer and the Bank.
6.2	To test usability of the soil, samples will be taken during excavation in order to determine its potential use. Material which does not meet the required standards of compactness will be replaced with material with better geo-mechanical characteristics.
6.3	Whilst locations which will be used for temporary storage of material are not yet precisely defined, they will avoid natural habitat and areas within 50m of watercourses. Temporary material storage area will be arranged in a way which ensures that there won't be any landslides. After completion of the construction works, temporary storage sites will be rehabilitated according to the requirements of the Supervising Engineer and restored back to previous condition or better.
7	**Commitments to be included in a Hazardous Materials Management and Spill Prevention Plan**
7.1	Fuel, oil or hazardous materials required to be stored, should 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 should be constructed of concrete or other suitably impermeable material. No drains from the storage area should be installed.
7.2	No more than 100 liters of fuel, lubricant or any other hazardous material stored at any one point in the RoW.
8	**Commitments to be included in a Construction Traffic Management Plan**
8.1	The Construction Traffic Management Plan (TMP) must cover vehicle safety, driver and passenger behaviour, hours of operation and accident reporting and investigation etc. All drivers will be trained, and strict speed limits will be enforced.
8.2	Develop and implement a Construction Traffic Management Plan (CTMP) to minimise risk to road users as well as local communities (e.g. Project equipment will be transported at night when fewer road users). The plan will cover vehicle safety, driver and passenger behaviour, hours of operation and accident reporting and investigation etc. All drivers will be trained, and strict speed limits will be enforced. The CTMP will need to assess all issues outline in the Key issues and Minimum Requirements document outlined in Annex G.
8.3	All drivers will be trained on the details of the CTMP, which will include specified routes, working hours and speed limits, etc.
8.4	The Project will ensure that there is adequate provision for road crossings close to bus stops for the safety of bus users, particularly school children.
8.5	As pedestrian flow data is not currently available, an assessment of pedestrian movement is required to assist in identifying the impacts of the project on pedestrians, for example identifying areas where heavy vehicle flows increase by a significant percentage and significant numbers of pedestrians are affected. Appropriate

	remedial measures may therefore be designed in subsequent stage within the Traffic Management Plan
8.6	Local stakeholders will also be engaged to discuss road safety and incident reporting. This will be particularly important for any school children using the buses on the road to reach school. Details will be contained in the Project's Stakeholder Engagement Plan (SEP).
8.7	Public rights of way have currently not been identified. This would need to be undertaken as part of detailed construction logistics, to ensure public rights of way are maintained, particularly during the construction phase. Cycle routes have not been explicitly identified at this base lining stage, as construction routes are not yet known.
8.8	The project design plans for 23 bus stops that will be located along the upgraded route. Possible bus traffic changes will be further elaborated in the Construction Traffic Management Plans that will be prepared by the contractor and coordinated with TA.
8.9	For traffic control and safety, the information about the project activities and driving standards will be announced through the local radio/TV. The Engineer and the Contractor/s will openly and transparently inform residents of the affected places and villages as a minimum on a weekly basis regarding the planned activities and safety measures to be employed.
8.10	The CTMP shall establish speed limits for construction vehicles and machinery at the construction site and the haulage roads used, and organize traffic so as to avoid as much as possible populated areas.
8.11	A review of personal injury accidents in key locations where construction traffic is predicted to interact with general traffic should be undertaken. Ideally this would cover a five-year period, and would be undertaken in consultation with local government agencies, local police, and other relevant organisations. This would allow specific areas or intersections to be identified, and may reveal locations where remedial measures would be required/recommended.
8.12	The main road needs to remain open during the entire reconstruction period and therefore will not be completely closed to traffic. The construction schedule has been envisaged in such a way that a new bridge will first be built, while traffic continues to flow smoothly over the existing bridge. Reconstruction of the existing bridge will start only when the construction of a new bridge is finished.
8.13	Appropriate visible traffic signs will be set up at all locations along the route where the work is being performed. Traffic signs will also be placed at the intersections with the existing local roads.
9	**Commitments to be included in a Construction Noise and Vibration Management Plan**
9.1	Develop and implement a noise and vibration management plan to include (but not be limited to) ensuring that the following obligations are met:
9.2	All construction equipment will comply with the requirements of EU Directive 2000/14/EC on noise emission in the environment by equipment for use outdoors (there is a lack of national legislation on outdoor equipment emission noise levels)
9.3	The equipment will be fitted with appropriate noise muffling devices that will reduce sound levels
9.4	Construction works shall not be permitted during the night; the operations on site shall be restricted to the 07.00 -19.00 h
9.5	Affected local residents will be kept informed on due time of the planned works and noise levels and Periods during which they will occur
9.6	The location of noisy equipment will be chosen as far as possible from sensitive receptors. When near sensitive receptors, construction works will be scheduled and provided with the necessary resources so that the time of exposure is as short as possible
9.7	Good management practice will be used to distribute heavy noise equipment along the route so as to avoid the cumulative effects of noise
9.8	In the case where noisy works would need to be performed at night or during a longer Period than one day at a given site, a noise shield shall be erected around the working area.
9.9	Operate earthmoving equipment on the construction site far away from vibration-sensitive receptors as possible
9.10	Activities such as demolition, earthmoving and ground-impacting operations shall be scheduled so as not to occur in the same time Period. The total vibration level produced could be significantly less when each vibration source operates separately
9.11	Select demolition methods not involving vibration impact, where possible.
9.12	Avoid vibratory rollers and packers near sensitive receptors.
9.13	All vehicles and machinery used at the construction sites will be subject to regular maintenance
9.14	The equipment will be fitted with appropriate noise muffling devices that will reduce sound levels
9.15	Every effort shall be carried out to comply with the correspondent noise limits for each area where the construction works will take place.
9.16	Monitoring of traffic noise as per Montenegrin legislation and GIP will be implemented during the operation phase. Appropriate maintenance activities will be carried out to uphold the barriers' effectiveness of sound attenuation.

9.17	A full time environmental supervisor will be appointed to oversee the delivery of the Construction Noise and Vibration Management Plans
9.18	If assessment during final design highlights db readings are expected to exceed permissible levels the Contractor must implement additional mitigation measures to limit impacts to local receptors. This could include: appropriately high/laterally extensive acoustic fencing or earth bunds installed, installation of absorbing exterior panels in areas with sensitive receptors
9.19	A noise assessment and management plan will be developed for the road during its operational to ensure the effectiveness of the noise mitigation measures. This will include, at a minimum the following items; identification of sensitive receptors, locations of monitoring points, schedule monitoring frequency, action/response plan, responsibilities and reporting and communication plan.
9.20	Further detailed analysis of vulnerability of the local population to traffic noise created along the reconstructed road M-18 Danilovgrad-Podgorica will be required. This should include, creation of noise maps, all further technical documentation and the identification of all protective measures that will be introduced.
9.21	The Contractor will monitor Peak Particle Velocity (mms) and decibel (dB) levels and ensure that levels do not exceed BS standard values (BS 7385, BS 6472, BS 5228).
10	**Commitments to be included in a Chance Finds Procedure**
10.1	A Chance Finds Procedure will be developed prior to construction that will outline the process for managing any cultural heritage that is encountered unexpectedly during the construction process (including notifying relevant competent bodies and securing the area to avoid further disturbance or destruction until an assessment has been completed by a qualified specialist).
11	**Commitments to be included in a Blasting Plan**
11.1	Design and implement a blasting plan in accordance with GIP for any blasting works required. Use blasting plan to minimise potential impacts to human and ecological receptors as a result of blasting works. Conducting a monitoring survey during the occurrence of blast events at the nearest receptors to monitor the levels of air blast and vibration caused by blasting. Use the results as necessary to design future blasting to avoid significant impacts as appropriate.
12	**Commitments to be included in a Stakeholder Engagement Plan**
12.1	Update and implement stakeholder/community 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
12.2	The contractor is to track grievances related to construction activities and adjust mitigation/management measures accordingly where necessary.
12.3	The grievance mechanism will ensure the Project is aware of any complaints, so that appropriate mitigation and management measures can be put in place, as necessary.
12.4	Local stakeholders will also be engaged to discuss road safety and incident reporting. This will be particularly important for any school children using the buses on the road to reach school. Details will be contained in the Project's Stakeholder Engagement Plan (SEP).
12.5	A grievance mechanism for the Project will be designed and implemented to capture any concerns or complaints about Project-related traffic.
12.6	The Project will implement a programme of awareness raising with the local community; especially schools. Details will be captured in the Project's SEP, once the most appropriate method(s) has been defined.
12.7	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. Specific attention will be given to school children accessing the new bus stops. This will be captured in the Project's SEP.
12.8	The grievance mechanism (as detailed in the SEP) will also be an important mechanism for local stakeholders to report any complaints about security personnel and for the Project to develop resolutions.
12.9	Relevant details of the CTMP will be shared with local stakeholders, the process of which will be detailed in the Stakeholder Engagement Plan (SEP). 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 TAs website, so that road users can plan their travel appropriately.
12.10	The Project will implement a local procurement policy and hiring process to maximise local employment.
12.11	Grievances will be carefully monitored, and where necessary, additional traffic management measures implemented in response to issues raised by stakeholders.
12.12	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.
13	**Commitments to be included in a Land Acquisition and Resettlement Plan**
13.1	Identify a qualified TA social manager to guide PR compliant consultation, disclosure, data collection, impact identification, design of entitlements, implementation of resettlement plan, monitoring and grievance

	management.
13.2	Develop and implement an EBRD Performance Requirement compliant engagement process with affected Households
13.3	Develop and implement an EBRD Performance Requirement compliant resettlement grievance process
13.4	Design and implement a census-level asset verification and supplementary Socio-Economic Survey (SES) with affected Households
13.5	Design and implement an effective approach for verifying asset losses and impacts with affected businesses
13.6	Based on the above, develop a more complete understanding of resettlement impacts and differentially impacted groups
13.7	Development of a complete entitlement framework, in consultation with affected Households
13.8	Implement additional compensation and support measures to mitigate resettlement impacts effectively, including support for livelihood restoration and support for differentially impacted groups
13.9	Continue engagement with affected households throughout the resettlement compensation and support processes
13.10	Monitor and report on implementation of resettlement compensation and support measures
13.11	Contract an independent third party to carry out an external completion audit of the Land Acquisition and Resettlement Plan for all phases of the road improvement project
13.12	Implement any corrective measures identified in the external completion audit.
14	**Conditions to be included in a Labour and Working Conditions Management Plan**
14.1	The Labour and Working Conditions Management Plan is to establish a Local Procurement Policy aimed at establishing provisions for local content in procurement and recruitment processes.
14.2	The Labour and Working Conditions Management Plan (LWCMP) must include a plan for the works, based on the identification of key hazards, and ensure appropriate emergency preparedness and response planning.
14.3	Ensure that all staff are made aware of, and understand their individual roles and responsibilities in achieving compliance with, the CESMP. This is to be incorporated this into a Worker Code of Conduct document.
14.4	The LWCMP should include awareness training the following as a minimum: - 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; - Relevant plans to be implemented
14.5	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.
14.6	The Project's HR policy will have clear details about workers' contract periods so that they (particularly construction workers) 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.
14.7	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.
14.8	The Project will develop a Local Content Policy with requirements and targets around the hiring of workers from within the local area, to maximise local recruitment. Opportunities to source goods and services from local businesses will also be required under the policy.
14.9	Local communities will be kept informed of upcoming recruitment for the Project and this will be captured in the Project's Stakeholder Engagement Plan (SEP).
14.10	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' and Good Practice Note on 'Managing Contractors Environmental and Social Performance, ICF 2017'.
14.11	There will be a Code of Conduct, training and a disciplinary procedure for workers, governing their behaviour and interactions with local communities.
14.12	There will be clear OHS (Occupational Health and Safety) terms and conditions in subcontractor and worker contracts.
14.13	Regular audits will be undertaken of all construction sites and accommodation area, to verify the effectiveness of prevention and control strategies. There will also include the contractors and sub-contractors.
15	**Commitments to be included in an Emergency Preparedness and Response Plan**
15.1	An Emergency Preparedness and Response Plan must be developed covering the following topics; Traffic incidents, fire in RoW, pollution incidents and any further topics identified during detailed design
15.2	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 Emergency Preparedness and Response Plan (EPRP).
15.3	An Emergency Preparedness and Response Plan (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.