

Environmental and Social Action Plan - Vutcani

No	Action	Benefits / Reasons and Implementation	Legislative requirement / EBRD performance requirement / Best practice	Investment Needs / Resources / Responsibility	Timetable action to be completed by	Target and evaluation criteria for successful implementation
0	Prepare and submit reports on status of ESAP implementation and environmental, health, safety and social performance, including resolution of grievances associated with the project. The Company will comply with the requirements of the Corporate ESAP.	Continual assessment of EHSS performance against EBRD PRs	EBRD PR1, PR2 and PR10	Internal resource	Annually	Submission of reports on environmental, health and safety, and social (EHSS) performance. These reports will be provided to the Lenders but also made available to stakeholders on request.
1	Comply with all permits, permit conditions and results of inspections and monitoring reports.	Best practice	Romanian law EBRD PR 1	Internal resource	Continuously	Report any violations and consequences.
2	Develop and implement an Environmental, Health and Safety Management System (EMS) in accordance with corporate requirements.	Best practice	EBRD PR1, PR4	Internal resource (or supported by external consultant)	Q1 2014	Development of an EMS. Attainment of ISO 14001 or equivalent. Annual EHS Report to be submitted to the Bank.

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3a	Undertake one-off noise monitoring surveys at sensitive receptors i.e. at nearby residences to verify noise levels are acceptable.	Compliance with regulatory requirements	EBRD PR3, PR4	Internal resource (or resourced externally – up to €5000)	Six months following completion.	Survey report, including compliance status
3b	Monitor noise at residences upon receipt of complaints or request by owner/occupant. Implement mitigation to reduce noise levels to acceptable levels if needed	Ensure no disturbance of residents	EBRD PR3, PR4	Internal resource (or resourced externally -- up to €3000)	Throughout operation.	Report on noise complaints and requests, and on results and mitigation if needed.
4	Develop comprehensive waste management plans to include: 1. Procedures for proper handling of all waste generated. 2. Methods to verify proper off-site management of related wastes by contractors. 3. Measures to minimise waste generation and maximise reuse and recycling. 4. Waste segregation and designated storage locations.	Minimisation of waste for disposal	Best Practice / EBRD PR3	Internal resource (provided by contractors)	To be implemented during operation.	Waste management plan and audit of implementation.
5	Undertake a health and safety risk assessment of all staff job functions and activities, and implement health and safety action plan covering control measures and	H&S risks	EBRD PR2, PR4	Internal resource	Q4 2012	Risk Assessment. Report upon adoption of H&S action plan.

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	work instructions as required.					
6	Ensure contractors and staff have: 1. An emergency procedure developed. 2. Implemented HSE training of staff. 3. Access to personal protective equipment and use such equipment.	Contractor management	EBRD PR1, PR4	Internal resource (and provided by contractors)	July 2012	Contractor and company EHS performance data – accidents and statistics. Report on training.
7a	Appoint a qualified Independent Ornithological Expert (IOE) in accordance with corporate procedures to develop and/or review/approve methodologies for seasonal bird monitoring and for mortality monitoring for birds and bats. The IOE will implement a formal turbine shut down system or reduce the speed of operation of wind turbines, when significant risks of bird collisions occur. The IOE will be approved by the Lender.	Ensure representative quality data	Best practice EBRD PR3	€3000	Approved methodologies to be agreed within three months of Board approval	Report on development/approval status. Annual report to the Lenders, and publishing of a report to be made available to stakeholders on request. The report will also be sent to the Valsui Environmental Protection Agency (EPA).
7b	Implement biodiversity monitoring programme developed under 7a.	Identify actual impacts on birds (and bats if applicable)	Best practice EBRD PR3	€10000 per year	See 7c	
7c	Appoint a qualified independent	Evaluate actual	Best practice	First 2 years: €2000	Seasonal: at	Report on monitoring

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	ornithologist to review results of each year's monitoring, and cumulative data, to determine (a) the need for additional mitigation measures if there are unacceptable impacts, (b) the need for continuing seasonal monitoring for another year.	impacts, mitigate as needed, plan for future needs	EBRD PR3	per year Mortality monitoring: €1000 per year	least 12 months in accordance with permit requirements, until ornithologist deems no longer needed. Mortality: throughout operation.	and mortality, and on the ornithologist's recommendations.
7d	If needed based on ornithologist's recommendation under 7c, develop and implement mitigation measures to reduce impacts to acceptable levels.	Reduced impacts, if necessary	Best practice EBRD PR3	Not possible to estimate at present	As agreed with IOE	Report on mitigation and implementation.
7e	Within 2 years of the operation of the wind farms, undertake a bird collision assessment, in line with recognized international best practice and based on a model as advised by the IOE, and discuss with key stakeholders, inclusive of SOR and regulators. Revise the shutdown system/protocol based on the findings of the collision risk assessment. A report will be provided to the Lenders and a summary of the study published on the	The collision risk assessment will enable a review of operational and monitoring data and to verify the assessment made in the initial studies. Based on the results of the study, the	Lenders requirements	External consultants	Within 2 years of commissioning the project	Report on results of collision risk assessment and required mitigation measures and changes to monitoring plan if applicable.

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	internet.	company will amend an action plan and operational conditions, as far as these are possible.				
7f	Ensure conductor spacing on transmission line is sufficient to prevent electrocution of the largest birds expected to be present, or otherwise appropriate to eliminate the possibility of electrocution.	Reduced mortality	Best practice EBRD PR3	Not possible to estimate at present	Q3 2013	Report on need for modifications.
8	Develop labour and social policies and incorporate into contractual arrangements with employees and contractors – to include terms of employment, skills, dismissal, discrimination, harassment, violations, human rights, forced and child labour, wages and social leave/benefits, health & safety and bribery and corruption.	Contractor management	EBRD PR1, PR4	Internal resource (provided by contractors)	Q1 2013	Employment and social policies.
9	Maintain and further develop a Stakeholder Engagement Plan (SEP), including a Grievance Mechanism.	EBRD performance standards	EBRD PR10	A SEP has been developed for use on this project	July 2012	SEP document to be updated every 3 years.
10	Implement the agreed SEP, inform stakeholders of activities and possible impacts, and receive and respond to	EBRD performance	EBRD PR10	Internal resource (appointment of project	To be implemented during	SEP as amended, grievances and responses to

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	grievances.	standards		communications manager)	operation	grievances.
11	Develop and implement a decommissioning strategy that includes a plan for minimising impacts during decommissioning.	Best practice	EBRD PR1	Internal resource	At end of the life of wind farm	Decommissioning plan.