

Environmental and Social Action Plan Solar Photovoltaic Plants, Romania, EDP Renewables				
<i>No</i>	<i>Action</i>	<i>Source of Requirement</i>	<i>Date required</i>	<i>Target and Evaluation Criteria for Successful Implementation</i>
0	Submit report to the Bank on environmental, social, health and safety performance, including status of each ESAP element and other agreed activities.	EBRD	- First report due following completion of construction period then annually thereafter	Submission of annual reports on schedule in a mutually agreed format.
1	PR1: Environment and social management			
1.1	Develop and implement integrated environmental, social, and occupational health and safety management systems equivalent to those under ISO 14001 and OHSAS 18001	Best practice EBRD PR 1	- Develop systems prior to operation - Implement throughout operation	- Systems developed by qualified consultant, staff trained, systems implemented - Status reported in each report to Bank
1.2	Maintain a corporate Environmental Manager and person responsible for social management and community relations for EDP Romania.	Best practice EBRD PR 1	At all times during construction and operation.	Responsible person maintained at all times.
1.3	Receive and comply with all national legislation and permits. As part of contracts, require contractors to comply with all national environmental and health and safety laws, permits, and relevant requirements of this ESAP. EDPR to monitor contractor performance (see 1.4 below).	Romanian Law EBRD PR 1 IFC PRs and PSs	Prior to beginning any activity that requires permits or authorisations.	- All permits and authorisations received - Contractor reports submitted to EDPR - Reports submitted to authorities as required - Compliance status reported to Bank - Report incidents of significant noncompliance immediately

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1.4	Include EHS management requirements in contracts, including for EPC contracts. EHS manager to monitor implementation and contractor compliance.	Best practice EBRD PR 4	During tender process.	<ul style="list-style-type: none"> - All contracts include relevant requirements - Include information on contractor compliance in reports to Bank
2	PR2: Labour and working conditions			
2.1	Maintain formal grievance mechanism for employees, including contract employees (note: this is separate from the stakeholder grievance mechanism required under item 10.1).	Best practice EBRD PR 2	Maintain throughout construction and operation.	<ul style="list-style-type: none"> - Mechanism in place and in effect for EDPR and all contractors - Report to Bank on worker grievances and resolutions

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2.2	<p>Develop and implement an occupational health and safety (OHS) plan to guide all activities on project sites during site preparation, construction, and operation. Also require contractor plan/compliance. Requirements to include (but not be limited to):</p> <ul style="list-style-type: none"> - Allocation of responsibilities among EDPR, EPC contractor(s), subcontractors. - Job- and task-specific hazard analysis and controls for all activities - Provision of PPE, requirements for use of PPE, and enforcement of PPE use - Safety training for all personnel in their language, covering hazards and safety protocols of their jobs - Review and approval of contractors' OHS plans, which must meet same standards as EDPR plan - Oversight of contractor OHS implementation, including mandatory reporting - Recording incident statistics, including total work hours, lost time incidents, major injuries/fatalities, etc. 	Best practice EBRD PR 2	<ul style="list-style-type: none"> - EDPR (or lead contractor) plan: prior to construction and throughout operation - Contractor plan: prior to contractor activities on-site during all project phases 	<ul style="list-style-type: none"> - Submission and approval of EDPR plan by independent OHS professional and/or EBRD prior to construction - Submission of contractor OHS plan(s) and approval by EDPR (or oversight contractor) - Report to Bank on OHS issues, including incident statistics and status of training (to cover EDPR and contractor workforces) on annual report - Report to Bank at time of major accidents and/or fatalities on annual report
3	PR3: Pollution prevention and abatement			
3.1	Develop and implement "Construction Environmental Management" Plan and "Waste Management in Construction" Plan. Require contractors to comply.	Best practice EBRD PR 3	<p>Develop: prior to construction</p> <p>Implement: throughout construction.</p>	<ul style="list-style-type: none"> - Plan developed prior to construction - Plan implemented successfully - Report to Bank on status of plan and implementation

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3.2	CEMP to include appropriate requirements for: - Dust control in dry periods - Erosion control in wet periods, including application of best practises to salvage, store, and reuse topsoil; control run-off to avoid erosion; quick repairs to erosion features; and restoration/revegetation of all disturbed areas.	Romanian law EBRD PR3	- Develop prior to construction activities - Implement throughout construction	Inclusion of requirements in CEMP
3.3	Use motion sensors to control security lighting rather than having continuous lighting.	EBRD PR3	Throughout operation	- Install and maintain motion sensors - Deal with community concerns as appropriate.
4	Community health, safety and security			
4.1	Prepare and implement internal and external Emergency Plans for construction and operation.	National regulatory requirements EBRD PR 4	- Development and adoption of EMP: prior to construction and operation (if separate plans) - Implementation: throughout project life	- Review of plan by authorities as required by permits - EHS Manager to monitor implementation - Report to Bank on status of Plan(s) on annual report - Report to Bank on actions taken with EMP(s) triggered on annual report
5	PR5: Land acquisition, involuntary resettlement and economic displacement			
	No actions identified			
6	PR6: Biodiversity conservation and sustainable management of living natural resources			

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6.1	For Burila Mica and Gruia, conduct surveys before all ground is disturbed to identify presence of protected species or habitats in and near areas to be disturbed and if necessary design appropriate mitigation, including such things as: - Presence of protected flora. If found, salvage or micro-locate construction site. - Reschedule construction to avoid sensitive periods for protected species.	Romanian law EBRD PR6	- Surveys and mitigation design (if needed): before all ground is disturbed - Implement mitigation: as designed	- Complete biosurveys - Develop and implement mitigation as needed - Report to Bank status of surveys and additional mitigation on annual report
6.2	Monitor the Gruia site during the first operational year and based on the monitoring results implement measures to mitigate potential negative impacts on the protected area. Continue the monitoring throughout the second year also, if the conclusion of first annual monitoring report requests to continue the monitoring campaign.	Best practice EBRD PR6	During first operation year	Complete monitoring and identify and implement mitigation measures if required
6.3	Assess the need and feasibility for adding nest boxes, platforms or other suitable nesting aids if there are any identified ground-, platform- or hole-nesting bird species or bats at any sites. (Assessment based on monitoring carried out under item 6.1.)	Best practice EBRD PR6	- Add aids: as determined to be appropriate	- Sites within or near Natura 2000 areas: commission an expert to evaluate whether necessary - Other sites: assess the need for evaluation by an expert

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6.4	<p>Conditions stated in the Burila Mica Natura 2000 permit will be applied to all sites to support development of semi-natural habitats.</p> <ul style="list-style-type: none"> - Allow the wild local herbal vegetation to grow up to 20 cm above ground level (higher vegetation will shade the PV panels and affect their operation); - Water the vegetation during periods of drought, to ensure proper development conditions; - Mow the vegetation periodically, according to local conditions. For Burila Mica and Gruia, the mowing will be done only after August each year; the remaining sites will be mowed at the same time as the neighbouring agricultural fields; - The local vegetation spread and natural selection should remain on the sites. 	Best practise EBRD PR6	During operation	- Implement watering and mowing schedule as defined
6.5	<p>Restore all land affected by the projects to their initial conditions including reuse of the removed top soil, restoration of the vegetation layer and initial watering of vegetation. Monitor and repair/replace vegetation until self-sustaining.</p>	Environmental Permit conditions EBRD PR6	Following construction, prior to commercial operation	<ul style="list-style-type: none"> - All land restored and vegetated. - Report to Bank on success of restoration/vegetation on annual report

8	PR8: Cultural heritage			
	No actions identified			
10	PR10: Stakeholder engagement			
10.1	Develop and implement the agreed Stakeholder Engagement Plan, including external stakeholder grievance mechanism. Post SEP and fact sheets on company website.	EBDR PR 10 Best practice	Throughout construction and operation.	<ul style="list-style-type: none"> - Report to Bank on consultation activities on annual report - Report to Bank on all grievances received and how addressed / resolved on annual report