

Environmental and Social Due
Diligence, Impact Assessment and
Road Safety Audit for the Moldova
TENT-T Road Network Rehabilitation
Project, DTM 55768

Project No. 12002-106

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Environmental and Social Action
Plan R7

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Project sheet

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1. Environmental and Social Action Plan

1.1. Approach

The primary objective of this assessment is to confirm the Project's alignment with Environmental and Social (E&S) performance requirements. This is accomplished through the Environmental and Social Requirements (ESR) Compliance Assessment separately conducted by Haskoning; which also proposes necessary measures in the form of an Environmental and Social Action Plan (ESAP) to address any identified gaps. Accordingly, this report should be read in conjunction with ESR Compliance Assessment Report for R7 issued on 23 July 2026.

1.2. Methodology

In line with the methodology defined in Section 3: Project Compliance with EBRD Standards in the ESR Compliance Assessment Report; proposed actions are classified under each applicable standards, followed by a risk classification where the risks are categorized based on the descriptions summarized in below:

Corresponding alignment with the methodology matrix in the ESR Compliance Assessment Report (in Section 3.2) is highlighted in bold in below table.

Risk Categorization	Description
Fatal Flaw	Project activities that can result in a significant regulatory non-compliance that may have repercussions for operational shut down, significant reputational damage and/or fines/criminal proceedings for the Project proponents.
High Risk	- Project assessments and plans are not aligned with EBRD PR requirements (MN), substantial effort is required to address these - Project activities may lead to irreversible impacts on ecological and/or social resources or receptors - Project practices could lead to severe and long term environmental and social impacts - Project practices could lead to reputational risks and/or conflict with stakeholders - Project practices may lead to regulatory non-compliance and can therefore result in long term business interruptions and fines
Medium Risk	- Project assessments and plans are partially aligned with EBRD PR (PC) requirements, effort is required to address these - Project practices may lead to regulatory non-compliance and can therefore result in short-term business interruptions and fines
Low Risk	Project assessments and plans are partially aligned with EBRD PR (PC) requirements, limited effort is required to address these
Negligible/No risk	Project assessments and plans are fully aligned with EBRD PR (FC) requirements

Table 1-1: Risk categorization and matrix

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
ESR 1	Assessment and Management of Environmental and Social Risks and Impacts						
1	<i>Environmental and Social Assessment- Identification of Risks and Impacts</i> <i>In line with EBRD ESR1, the Projects' ESA process took place and ESA Report was prepared. As part of Project ESA, Environmental and Social Management Plan (ESMP) has also been prepared. The ESMP is clear in listing the impacts, the required mitigation and monitoring measures, as well as roles and responsibilities.</i> Update the cumulative assessment once the exact location of the labour camps and any project associated facilities are determined, update the ESMP accordingly.	EBRD ESR1 Best practice National legislation	Low	- Updated ESA or associated management plans containing cumulative impact assessment and mitigation measures - Updated Environmental and Social Management Plan (ESMP)	Before construction ¹	NRA	Open
2	<i>Environmental and Social Management System</i> Develop and implement a comprehensive Environmental and Social Management System (ESMS), including environmental and social policy, that aligns with the requirements of EBRD ESR1 and ISO 14001. This system shall allow for the identification, evaluation, and	EBRD ESR1 Best practice National legislation	Medium	- Project specific, integrated Environmental, Social, Health and Safety Management System in place - Overarching Environmental and Social Policy in	Before financial close	NRA	Open

¹ Before construction, is the period after the financial close and before the actual start of construction. This is often called as the Contractor mobilization phase.

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	mitigation of environmental and social risks of projects, as well as comply with regulatory requirements and lender environmental and social standards.			place			
3	<i>Organizational Capacity and Commitment</i> <i>The project shall be managed by the NRA. The actual work will be executed by an EPC contractor selected via a competitive tender procedure. The current E&S organization present with NRA is sufficient to manage the E&S risks in organization projects. However, it was identified that E&S specialists guided by mainly national legislation requirements rather than best practices or any lender guideline. Therefore:</i> • NRA E&S specialists shall seek training and technical assistance to increase their understanding of EBRD ESRs and how to translate these into their operations, e.g., set the contractor E&S requirements and monitoring projects that are implemented in line with the Lenders requirements.	EBRD ESR1 Best practice National legislation	Medium	• Project specific requirements in line with Lenders Requirements, monitoring tools and forms • Training records of E&S specialists	Before financial close	NRA	Open
4	<i>Supply Chain Policy</i> • Develop Supply Chain Policy and cascade to contractors and each subcontractors. • The NRA uses the FIDIC Red Book² as	EBRD ESR1 EBRD ESR2 Best practice National	Medium	• Supply Chain Policy • Updated FIDIC Contract including supply-chain	Before financial close	NRA	Open

² A standard construction contract published by the International Federation of Consulting Engineers (FIDIC), tailored for projects where the Employer provides the design and the Contractor executes the work. The standard FIDIC Red Book (2017/2022 editions) contains contractual obligations on the Contractor to address environmental, health, safety, and social matters—but it does not include detailed

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	template for the contract and as legal document with its contractors. The FIDIC Red Book is not completely aligned with ESR1 and 2. Therefore, include additional clause to FIDIC Contract explicitly committing to: - Supply chain requirements (as per the financing documents) - Measures listed in Project ESIA (2026) - Complying with Project's ESMS and Applicable Standards - Ensuring sufficient E&S, safety and labor management personnel are present onsite. - Right of site access of Project, the lenders and their advisors. • Include a clause in FIDIC Contract requiring contractors to ensure their primary supplies are free from child and forced labor.	legislation		management related clauses			
ESR 2	Labor and Working Conditions						
5	<i>The NRA labour and working conditions procedures have been assessed. A range of existing policies, systems and procedures require alignment with ESR 2.</i> HR Policy and Labor Management System • Develop HR / Labor Management	EBRD ESR2 Best practice National legislation	Medium	• HR Policy • Labor Management System which covers contractors and subcontractors	Before financial close	NRA	Open

project-specific Environmental & Social (E&S) requirements. These need to be provided by the Employer, in this project case – the NRA.

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	System. Management system should include labor procedures, contract oversight, grievance mechanism, monitoring, reporting and inspections, working condition standards, GBVH safeguards, OHS integration and supply chain controls. • Adopt and implement the HR policy in line with national law and EBRD ESR2. HR policy and requirements shall apply to all project contractors. • Ensure that the labour policies are cascaded to all contractors.						
6	<i>Working Conditions/Terms of Employment</i> • Update NRA Code of Conduct to be aligned with ESR2. Include provisions on child and force labor prohibition, freedom of association and collective bargaining, employment terms, fair wages and working hours, grievance mechanism, supply chain and contractor compliance, worker accommodation (if applicable). Specifically, add a clause explicitly prohibiting child labor or any employment of persons under the age of 18 for Hazardous work. • Update NRA's existing FIDIC Contract (with third parties/contractors) to contain additional clauses explicitly stating the prohibition of child and force labor, ethical recruitment clauses (non-discrimination and equal opportunity to	EBRD PR2 Best practice National legislation	High	• Code of Conduct which contains provisions aligned with EBRD ESR2.	Before financial close	NRA	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	ensure fair and equal access to opportunities, training and wages), grievance mechanism requirements, passport/document retention prohibition, contractor obligation to meet ESR2 to all employees and subcontractors, supply-chain labor due diligence obligations, age-verification procedure, regular reporting and labor audits by the contractor. • Develop and implement a Contractor Management Plan that guides monitoring for ongoing compliance with ESR2. The plan includes a risk review by NRA of the EPC contractor to identify the risk of any potential labour/human rights risks and issues. • Develop a Collective Dismissal Procedure. • Develop a worker/labor grievance mechanism and grievance register as part of the Labor Management System. Worker grievance mechanism to be available to all workers including contractor workers and communicated to all workers as well as contractor and sub-contractor workers. The grievance mechanism will include specific provision for cases of Gender Based Violence and Harassment, including appropriate resources, mechanisms and controls. • Ensure that NRA has access and receives a copy of the contractor workers' grievance mechanism. In						

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	case of discrepancy, NRA's grievance mechanism shall be followed to resolve the grievances.						
7	<i>Accommodation</i> - The Project shall ensure that the EPC establishes worker accommodation in line with EBRD/ IFC guidelines on Workers' Accommodation: Processes and Standards. - Undertake an audit of the project-provided worker accommodation facilities prior to occupancy, followed by quarterly audits thereafter.	EBRD ESR2 EBRD ESR3 Guidance note on worker's accommodation published by EBRD/IFC (Worker's Accommodation: Processes and Standards) National legislation	Medium	- Undertake contractor labour performance as part of the selection process - Internal audit records for worker's accommodation in line with EBRD/IFC Guidance Note: "Checklist on Workers' Accommodation"	Before construction and quarterly accommodation audits during construction	NRA	Open
ESR 3	Resource Efficiency and Pollution Prevention and Control						
8	<i>Resource Efficiency</i> <i>Due to the stage of the project development, resource efficiency is not addressed in the ESA. Therefore, following actions are proposed:</i> - Project shall identify opportunities and alternatives for resource efficiency relating to the project in accordance with PR3 and best practices. - The potential cumulative impacts of water abstraction upon third party users and local ecosystems should be	EBRD ESR3 Best practice	Medium	- Updated ESMP - Contractor ESMP to include requirements for resource efficiency	Before construction	NRA	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	assessed and demonstrate that the Project's water supply will not have adverse impacts on water resources. Include requirements for resource efficiency in the ESMP and construction management plans, focusing on water recycling and water efficiency measures (due to water scarcity in the country especially in the summer periods).						
9	<i>ESA process has determined the appropriate pollution prevention and control methods, technologies and practices to be applied to the Project</i> <i>Pollution Prevention and Control - Air and noise emissions (Cont'd)</i> - Implement spot noise measurements during construction phase, provided works are taking place near sensitive receptors (close proximity to households, e.g., <10m, schools, healthcare facilities) and in locations with prolonged construction activities, and where national and EU thresholds are likely to be exceeded. - Update the ESMP and implement additional mitigation measures (e.g., temporary noise absorption panels).	EBRD ESR3 Best practice National legislation	Medium	- Noise sampling - Updated ESMP - Temporary noise absorption panels	During construction	NRA	Open
10	<i>Pollution Prevention and Control - Air and noise emissions (Cont'd)</i> Undertake soil sampling for the Drochia bypass – before the start of	EBRD ESR3 Best practice National	Medium	Soil sampling	Before construction	NRA	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	the construction, the section of the new road to be built, especially on detection of contamination with hydrocarbons and obsolete pesticides. (Undertake soil remediation, if pollution determined.	legislation					
11	<i>Waste Management</i> Project is committed avoid or minimize minimise the generation of hazardous and non-hazardous waste materials and reduce their harmfulness as far as practicable. Measures are included in the ESMP in detail. • Wastewater effluent shall be treated to EU effluent discharge parameters before discharge into natural environment. • Undertake an independent audit of the existing waste facilities that will be employed by the EPC for waste (wastewater) disposal to ensure these have sufficient capacity and proper facilities for waste treatment/disposal. • Update ESMP if any additional measures should need to be taken.	EBRD ESR3 Best practice National legislation	Low	• Audit records to existing waste facilities • Waste records produced and kept for the complete duration of the construction phase. • Updated ESMP	Before construction	NRA	Open
ESR 4	Health, Safety and Security						
12	<i>Hazardous Materials Safety</i> The Project is committed to apply appropriate risk management measures in order to minimise or control the release of such harmful substances/materials into	EBRD ESR3 EBRD ESR4 Best practice National	Medium	• Evidence of warning/notification for the requirement of MSDS for all	Before construction	NRA	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	environment. ESA provides sufficient requirements for the operational health and safety and use of chemical substances. Additional measures are listed in ESMP, existing Occupational Health and Safety Management Plan, Emergency Response Plan, and Waste Management Plan. These shall be applied by the project and expanded going forward. Therefore: - Add the requirement for keeping Materials Safety Data Sheets (MSDS) for all hazardous substances on-site. Add training of workers on MSDS content. Include the requirement for the use of MSDS in the Contractor's Environmental and Social Management Plan (C-ESMP). - Develop project specific Operational Health and Safety Plan in line with ESR 4	legislation		hazardous substances to be placed on site - Training of workers on MSDS content - Contractor's ESMP include requirement to use MSDS - OHS Plan			
13	Develop project specific Community Health and Safety Plan in line with ESR 4	EBRD ESR 4	Medium	CHS Plan	Detailed Design Phase Before Construction	NRA	Open
14	Develop project specific Traffic Management Plan in line with ESR 4	EBRD ESR 4	Medium	TM Plan	Detailed Design Phase Before Construction	NRA	Open
15	<i>Natural Hazards</i> In line with ESR4, the Project identified the potential impacts and risks caused by	EBRD ESR4 Best practice	Medium	Climate Change Risk Assessment (CCRA) using	Detailed Design Phase	NRA	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	<i>natural hazards, such as earthquakes, landslides or floods and ESA Report proposed adaptation measures to reduce impacts caused by climate change. The ESA however lacks a dedicated climate risk assessment, e.g., hazard analysis and vulnerability assessment. Therefore:</i> • Apply EBRD climate risk screening tool or equivalent to undertake a climate change risk assessment during the detailed design of the project.	National legislation		EBRD climate risk screening tool • Updated ESMP	Before construction		
16	Develop a project specific Emergency Response Plan in line with ESR 4, based on detailed design and latest project information and assessments to: • Introduce quantified triggers (e.g., spill volumes, injury severity, fire size, environmental release thresholds) that escalate from site-level to multi-agency level and the corresponding response procedure, • Ensure MSDS are used to determine actions in the spill response plan, • Define the type of drills that needs to be conducted per risk and the corresponding KPIs to recorded and monitored. • Coordinate with local authorities and public emergency services to share the Project ERP. • Set out a structured community communication plan for emergency alerts (multi-channel warnings, languages), safe assembly areas, or post-incident updates especially when	EBRD ESR4 Best practice National legislation	Medium	Updated ERP based on the project ESIA Emergency Response Plan	Before construction	NRA	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	the works will be conducted in close vicinity to the residential houses, Define the drills that need to be conducted together with the community, depending on the risk type and level.						
ESR 5	Land Acquisition, Restrictions on Land Use and Involuntary Resettlement						
17	<i>The project is committed to avoid/ minimize displacement and other forms of livelihood impacts. Physical displacement is not foreseen for this project. Economic displacement is relevant for minimum Drochia bypass, Lot 4.</i> - NRA to appoint an independent resettlement consultant with appropriate experience of working with lender requirements to develop and implement the project specific Resettlement Action Plan based on the Land Acquisition and Resettlement Framework (LARF) document developed for this project in 2025 (by Haskoning). This action plan shall outline the general principles, procedures and entitlement framework consistent with ESR5. - The scope and level of detail of the RAP shall vary with the magnitude of displacement and the complexity of the measures required to mitigate adverse impacts. In all cases, it will describe the ways and means by which the objectives of PR5 being fulfilled.	EBRD ESR5 Best practice National legislation	High	- RAP developed identifying all Project-Affected Persons (PAPs) and defining compensation at full replacement cost. - PAPs compensated fairly in accordance with RAP provisions prior to taking possession of the land.	Before construction	NRA to appoint independent consultant to develop and implement.	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
18	<i>RAP&LARF documentation</i> - Project shall conduct socio-economic census/survey to support RAP document to be developed for alignment with PR5. - Confirm a clear cut-off date for eligibility has been established. - Conduct vulnerability assessment as part of the RAP considering the social profile of the community - Identify and propose mitigation measures based on the vulnerability assessment as part of RAP.	EBRD ESR5 Best practice National legislation	High	- Socio-economic census/survey records - Cutoff date communication records - Vulnerable groups identified as part of the RAP - Records of implementation of appropriate mitigation measures.	Before construction	NRA to hire independent consultant	Open
19	<i>Compensation for Displaced Persons</i> - Land cannot be taken prior to the provision of compensation and other entitlements. - Compensation is to be paid to all eligible landowners and users as per lender standards prior to taking possession of the land.	EBRD ESR5 Best practice National legislation	High	- PAPs compensated fairly in accordance with RAP provisions prior to taking possession of the land. - Completion of compensation records	Before construction	NRA	Open
20	<i>RAP&LARF Monitoring</i> - Develop procedure and tools to ensure that monitoring and external reviews are scheduled to track RAP/LRP success. - Schedule independent external reviews to track the long-term success	EBRD ESR5 Best practice National legislation	High	- Reporting of findings and corrective actions. - Records of external reviews	Before construction	NRA	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	of RAP&LARF.						
21	<i>Funding/Budgeting</i> - Confirm budget includes top-up for full replacement costs. - Additional budget will need to be secured to meet lender requirements under ESR 5	EBRD ESR5 Best practice National legislation	High	All PAPS are compensated at full replacement cost. Additional budget secured to meet ESR 5 requirements	Before construction	NRA	Open
ESR 6	Biodiversity Conservation and Sustainable Management of Living Natural Resources						
22	<i>The project will create impacts on habitats, flora and fauna within the project construction footprint. The ESMP details the required mitigation measures.</i> <i>Assessment of Biodiversity and Living Natural Resources (cont'd)</i> - The proposed biodiversity measures in the ESA shall be further elaborated and made obligatory where needed, especially once the construction camp, work roads and other locations are known as well associated facilities. - The detailing of the proposed mitigation actions shall be done by qualified ecologist based on and latest project insights and must be agreed upon before actual start of interventions and included in a Biodiversity Management Plan (to be reviewed and agreed by the Lenders E&S Advisor on compliance with	EBRD ESR6 Best practice National legislation n	Medium	Biodiversity Management Plan	Before construction	NRA	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	ESR6). - Undertake preconstruction ecological survey and supervision by qualified ecologist in areas close to and/or that intercept Emerald sites (Lot 3) and National Nature Reserves. If biodiversity monitoring identifies impacts or risks for fauna and flora, identify suitable measures to avoid and reduce the risk, e.g., if nesting birds are found that might be disturbed by the project, the land clearnace must be put in hold until after the hutching or the disturbing activities should be done after or before the sensitive period. - Biodiversity monitoring for Lot 2 should also focus on the presence of endemic and protected flora and fauna species. - Biodiversity monitoring shall continue during the construction phase of the project for Lot 3 if sensitivities have been identified during the pre-construction ecological survey. If biodiversity monitoring identifies possible effects or risks for fauna and flora, identify suitable measures to avoid and reduce the risk.						
ESR 8	Cultural Heritage						
23	<i>Assessment and Management of Impacts on Cultural Heritage</i>	EBRD ESR8 Best practice	Negligible	Records of chance find entries (if any)	Before constructi	NRA	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	<i>Most of the roadworks shall be carried out on an existing road corridor whereby there are no cultural heritage sites located. The ESA identifies cultural and memorial sites along the road corridor but confirms that there is no direct physical interference between these sites and construction works.</i> The Project shall ensure that the EPC Contractor responsible for civil works shall prepare and implement a Chance Finds Procedure for the Project. This procedure shall be designed to address any potential discoveries of new cultural heritage elements during the construction phase and ensure appropriate measures are taken in response.	National legislation		Official notification to authorities in line with Chance Find Procedure	- on - During construction		
ESR 10	Information Disclosure and Stakeholder Engagement						
24	<i>Stakeholder Engagement Plan</i> <i>In line with ESR10, Project specific Stakeholder Engagement Plan (SEP) appropriate to the nature and scale or the risks, impacts and development stage of the project was developed within the scope of ESA process and Moldovan legislation. The SEP includes stakeholder identification, defines engagements principles and methods, establishes a Grievance Redress Mechanism procedure, outlines the roles and responsibilities for the implementing agencies and monitoring indicators.</i>	EBRD ESR10 Best practice National legislation	Medium	Updated SEP	- Before construction - During construction - During operation	NRA	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	<i>Although official GRM is in place, the mechanism was observed as a general procedure rather than Project-specific grievances. Therefore:</i> • Update SEP regularly including any records of stakeholder engagements.						
25	<i>Grievance Redress Mechanism (GRM)</i> • Develop Project-specific Grievance Redress Mechanism Procedure as outlined in ESR10 and disclose with community and local authorities and make accessible to them. • Implement and communicate project specific GRM. Ensure that priority is given, and resources allocated, to implement stakeholder engagement and communication activities.	EBRD ESR10 Best practice National legislation	Medium	• Record of engagements and grievances • A documented GRM procedure outlining the mechanism and resolution timeframe. • Register evidencing taken actions to resolve grievances	• Before construction • During construction • During operation	NRA	Open

Table 1-2: Environmental and Social Action Plan for the Project