

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

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Environmental and Social Requirements Compliance R7

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Project sheet

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Executive Summary

The Moldova TEN-T Road Network Rehabilitation Program aims to modernize 104.8 km of R7 and includes road sections extending from the junction with R14 (Drochia – Costești – Romanian border) towards both the southern and northern cross-border connections (Romania and Ukraine) under Tranche I Project (**the Project**). The project is categorized as **Category B under the EBRD E&S project categorization**. The project is critical for Moldova's integration into the EU transport network, improving connectivity, trade, and safety. The scope of the current report is assessment of the project against the EBRD Environmental and Social Performance Requirements (ESRs), 2024. The key highlights of the assessment are:

Project ESR Compliance Status

- **ESR 1** Assessment and management of environmental and social risks and impacts: The project is in **partial compliance**. There are specific policies and procedures to be developed for the project to ensure the project is developed in line with ESR 1, e.g., E&S policies, management system, human resource policies among others. Furthermore, project associated facilities are not known yet, e.g., location of the labour camp. Once the location is known, the assessment, the cumulative impact assessment will need to be revisited and ESMP updated.
- **ESR 2** Labour and working conditions: The project is in **partial compliance**. Various gaps have been identified connected to Human Resources Policies and procedures, their availability and alignment with ESR 2 requirements. To achieve compliance, the NRA should develop comprehensive HR policies and an HR management system and update their Code of Conduct and FDIC contract.
- **ESR 3** Resource efficiency and pollution prevention and control: The project is **partial compliance**. Several actions have been identified with respect to resource efficiency, waste facilities (solid and liquid waste), use of the chemicals that need to be detailed to ensure project alignment with ESR 3 requirements. The ESA is primarily based on desktop information, reconnaissance site visits and baseline data collection and sampling for ambient air quality and ambient noise. It is recommended to undertake noise measurements during the construction phase, provided the sensitive receptors are located in close vicinity to construction works and construction timeline extends.
- **ESR 4** Health, safety and security: The Project is in **partial compliance**, although the majority aspects are in full compliance. The project road design is aligned with the industry best practice. However, there are several improvements needed to address the road safety aspects. The ESA does not include a climate change risk assessment, and this is required since Moldova is prone to landslides, river and pluvial flooding. The ESA already provides templates for several OHS and community related management plans to be further expanded during the project implementation.

- **ESR 5** Land acquisition, restrictions on land use and involuntary resettlement: The project is in **partial compliance**. The project has applied measures to avoid displacement and land acquisition as much as possible, however, some economic displacement was unavoidable, especially in relation to construction of Drochia bypass. A project specific Land Acquisition and Resettlement Framework has been developed and will be applicable to this project going forward. A project-specific GRM must be implemented and communicated during stakeholder engagement going forward. This has to be applied to develop and implement the project specific Resettlement Action Plan.
- **ESR 6** Biodiversity conservation and sustainable management of living natural resources: The project is **in compliance**. The area passes through agricultural and semi-rural landscapes but comes into proximity and cross Emerald Sites. The ESA is primarily based on desktop information and reconnaissance site visits. Further pre-construction surveys and monitoring during construction will be essential to detail and reinforce biodiversity mitigation measures.
- ESR 7 Indigenous People: not triggered by the Project.
- **ESR 8** Cultural Heritage: The project is **in compliance**. There are no cultural heritage sites affected by the project development. A change find procedure is foreseen in the Environmental and Social Management Plan.
- ESR 9 Financial Intermediaries: not applicable for this project.
- **ESR 10** Stakeholder Engagement: The Project is **in compliance**. Continued engagements throughout project lifecycle are required, along with regular updates of the SEP recording all engagements and grievances. A project-specific Grievance Redress Mechanism, as outlined in the SEP, must be implemented and clearly communicated by the National Road Administration to all stakeholders and project affected communities..

Critical Next Steps

- Develop and implement the project Resettlement Action Plan based on the Land Acquisition and Resettlement Framework. Initiate the RAP activities with the socio-economic survey and vulnerability assessment.
- Communicate and implement project-specific Grievance Redress Mechanism in ensure the Stakeholder Engagement Plan is updated and maintained as a live document for the entire duration of the project.
- The ESA contains a range of management plans, that need to be adopted by the project and further detailed.
- Strengthen National Road Authority E&S capacity, develop E&S and Human Resource policies and systems, to ensure compliance with ESR requirements.

The project is aligned with EBRD objectives but requires targeted actions to address the gaps identified in this report to achieve full compliance with ESRs.

1. Introduction

1.1. EBRD ESR Compliance Background

The European Bank for Reconstruction and Development (EBRD) is considering a sovereign loan to the Republic of Moldova to support the Moldova TEN-T (Trans-European Transport Network¹) Road Network Rehabilitation Project. This project involves the rehabilitation, upgrading, and new construction across 10 road lots along the R7 and M3 corridors, covering approximately 175 km of road infrastructure.

The project is structured in two tranches, and is categorized in accordance with EBRD's Environmental and Social Policy (ESP, 2024):

- Tranche I (Category B): includes six lots along the R7 corridor (including rehabilitation and new construction).
- Tranche II (Category A): comprises four lots along the M3 corridor (including rehabilitation, widening and new bypass construction).

The project is designed to support country and regional mobility, boost cross-border trade, improve road safety, and develop sustainable transport infrastructure in line with European Union (EU) standards and international standards. Additionally, the rehabilitation works are critical for Moldova's integration into the European TEN-T network, which includes strategic corridors such as Chişinău–Giurgiuleşti (segments of the M3 road) and Soroca–Drochia–Costeşti (segments of the R7 road). Furthermore, the project supports Moldova's solidarity efforts² toward Ukraine, as a section of Lot 4 of the M3 road (Tranche II) forms part of the European corridor linking Ukraine with Romania, facilitating efficient goods transport and ensuring food security.

The National Road Administration (NRA) operates under the Ministry of Infrastructure and Regional Development and serves as the implementing agency for this project.

As part of EBRD's due diligence process, Haskoning has conducted this Environmental and Social Requirements Compliance Assessment using EBRD's 10 Environmental and Social Requirements.

This Report focuses on Tranche I (the Project), which includes four lots along the R7 corridor including rehabilitation and new construction.

¹ The TEN-T is the European Union's plan for an integrated transport infrastructure network, encompassing roads, railways, inland waterways, maritime routes, ports, airports, and terminals. It consists of nine European Transport Corridors, and in 2024, the Baltic Sea–Black Sea–Aegean Sea Corridor was extended to include Moldova.

² In May 2022, the EU launched an initiative called 'Solidarity Lanes' to maintain trade flows between Ukraine and the EU during and after the conflict. The Ukraine–Moldova border crossing at Giurgiuleşti, is a key component of this network, providing Ukraine access via Moldova to Romania and the EU.

1.2. Scope of EBRD ESR Compliance

This Environmental and Social Compliance Assessment covers **Tranche I** of the Moldova TEN-T Road Network Rehabilitation Project. To assess compliance, the project has been reviewed against the 10 EBRD Environmental and Social Requirements (ESR) and other applicable international standards as outlined in Chapter 1.3.

To conduct the assessment, a range of project specific available documents have been reviewed. The primary source of the assessment is the Tranche I Environmental and Social Impact Assessment (ESIA) and the findings of the Environmental and Social Audit. These documents, and a range of online available reports, discussion with the ESIA specialists and NRA specialists have been used to evaluate project performance and identify any gaps against the EBRD ESRs and international best practice. Where gaps were identified, specific recommendations have been developed to ensure alignment with EBRD requirements and international best practice as detailed in the Environmental and Social Appraisal table in Section 3.2 and 3.3.

1.3. Applicable Standards for EBRD ESRs Compliance

The EBRD ESRs Compliance Assessment will be conducted in accordance with the following international standards and requirements:

1. EBRD Environmental and Social Policy (2024), including the 10 Environmental and Social Requirements (ESRs):
 - ESR1: Assessment and Management of Environmental and Social Risks and Impacts
 - ESR 2: Labour and Working Conditions
 - ESR 3: Resource Efficiency and Pollution Prevention and Control
 - ESR 4: Health, Safety and Security
 - ESR 5: Land acquisition, restrictions on land use and involuntary resettlement
 - ESR 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
 - ESR 7: Indigenous Peoples (not applicable to this project)
 - ESR 8: Cultural Heritage
 - ESR 9: Financial Intermediaries (not applicable to this project)
 - ESR 10: Stakeholder Engagement
2. International Finance Corporation (IFC) Environmental, Health and Safety Guidelines - Toll Roads (2007)
3. General IFC Environmental, Health and Safety Guidelines (2007)
4. The Republic of Moldova has ratified 44 ILO Conventions and 1 protocol, with 43 in force. This includes all 10 Fundamental ILO Conventions:
 - C029: Forced Labour Convention, 1930
 - C087: Freedom of Association and Protection of the Right to Organise, 1948
 - C098: Right to Organise and Collective Bargaining, 1949
 - C100: Equal Remuneration, 1951

- C105: Abolition of Forced Labour, 1957
- C111: Discrimination (Employment and Occupation), 1958
- C138: Minimum Age, 1973 (Minimum age specified: 16 years)
- C182: Worst Forms of Child Labour, 1999
- C155: Occupational Safety and Health, 1981
- C187: Promotional Framework for Occupational Safety and Health, 2006

2. The Project

2.1. Project Organization

For the execution of the Moldova TEN-T Road Network Rehabilitation project and the management of Environmental, Social and Health (ESHS) aspects, the project involves several key stakeholders including:

- **Ministry of Infrastructure and Regional Development (MIRD):** Serves as the central authority, providing strategic oversight and policy direction for national infrastructure development. MIRD is responsible for planning and supervising the rehabilitation, modernization, and expansion of the road network, establishing sustainable financing mechanisms, and ensuring compliance with international standards. It also coordinates high-level stakeholder engagement and approves project strategies.
- **National Road Administration (NRA):** Acts as the primary implementing agency for national road works. Operating under MIRD, the NRA manages financial resources from the Road Fund and external sources. Following a government decision on June 13, 2024, the National Road Administration was reorganized into a joint-stock company, now called National Road Administration with full state capital to improve operational efficiency and absorption of external funds. The NRA has an ESHS team responsible for managing and monitoring the environmental, social, and health aspects of projects. The team consists of 2 staff members (1 focused on environmental aspects and 1 on social aspects), 1 Occupational Health & Safety (OHS) specialist, 3 personnel in the Human Resources Department, and 4 specialists in the Expropriation and Resettlement Department.
- **Contractors and Subcontractors:** Appointed through an open competitive tendering process to carry out construction, rehabilitation, and maintenance works. They operate under NRA supervision and must comply with contractual obligations, national standards, and the Environmental and Social Management Plan developed as part of the Environmental and Social Impact Assessment Studies.

The Contractor for Tranche II project is not known yet, and the tendering processes and selection is to take place in due course.

- **Owner's Engineer:** An independent entity that is appointed by the NRA to monitor project implementation, ensuring compliance with technical, environmental, and social standards. **The Owner's Engineer for Tranche II project is not known yet, and the tendering processes and selection is to take place in due course.**

Project key stakeholders are visualized in the figure below.



Figure 2-1: Project organization structure, highlighting the E&S personnel responsible for management and monitoring of the E&S aspects of the project.

2.2. Project Description

Tranche 1 of the R7 Road Corridor Project covers a total length of approximately 104.8 km and includes road sections extending from the junction with R14 (Drochia – Costești – Romanian border) towards both the southern and northern cross-border connections (Romania and Ukraine). The project is classified as Category B and is structured into four distinct lots, as summarized below:

- Lot 1 (R14 – Drochia, 29 km) – rehabilitation of the existing road section connecting R14 to Drochia, forming the northern part of the corridor.
- Lot 2 (Drochia – Rîșcani, 27.4 km) – continuation of the corridor through Drochia and Rîșcani districts.
- Lot 3 (Rîșcani – Costești, 30 km) – section extending towards the Costești border area, forming a key link to the Romanian border crossing.
- Lot 4 (**Drochia bypass**, 6 km) – includes both rehabilitation of an existing section and construction of a new bypass alignment designed to divert traffic around Drochia town.

Each lot forms an integral part of the broader R7 strategic corridor, which enhances national and international connectivity, particularly between Moldova, Romania, and Ukraine, and strengthens integration into the Trans-European Transport Network (TEN-T).

The Table 2-1 presents the main characteristics of each project lot, including the estimated length of the road

sections and the geographic coordinates of the start and end points.

Table 2-1: Location of project lots

Lot	Length, km	Coordinate	
		Start point	End Point
Lot 1 (R14 – Drochia)	29,0	48°10'42.99"N 28° 8'34.95"E	48° 2'25.72"N 27°50'12.50"E
Lot 2 (Drochia – Riscani)	27,4	48° 0'58.39"N 27°46'49.64"E	47°57'9.13"N 27°30'46.79"E
Lot 3 (Riscani – Costesti)	30,0	47°57'9.13"N 27°30'46.79"E	47°50'56.44"N 27°14'42.80"E
Lot 4 (Drochia bypass – existing road)	4,15	48° 2'25.72"N 27°50'12.50"E	48° 0'52.30"N 27°49'21.68"E
Lot 4 (Drochia bypass – new road)	3,58	48° 0'52.30"N 27°49'21.68"E	48° 0'58.39"N 27°46'49.64"E

The R7 is visualised in the picture below.

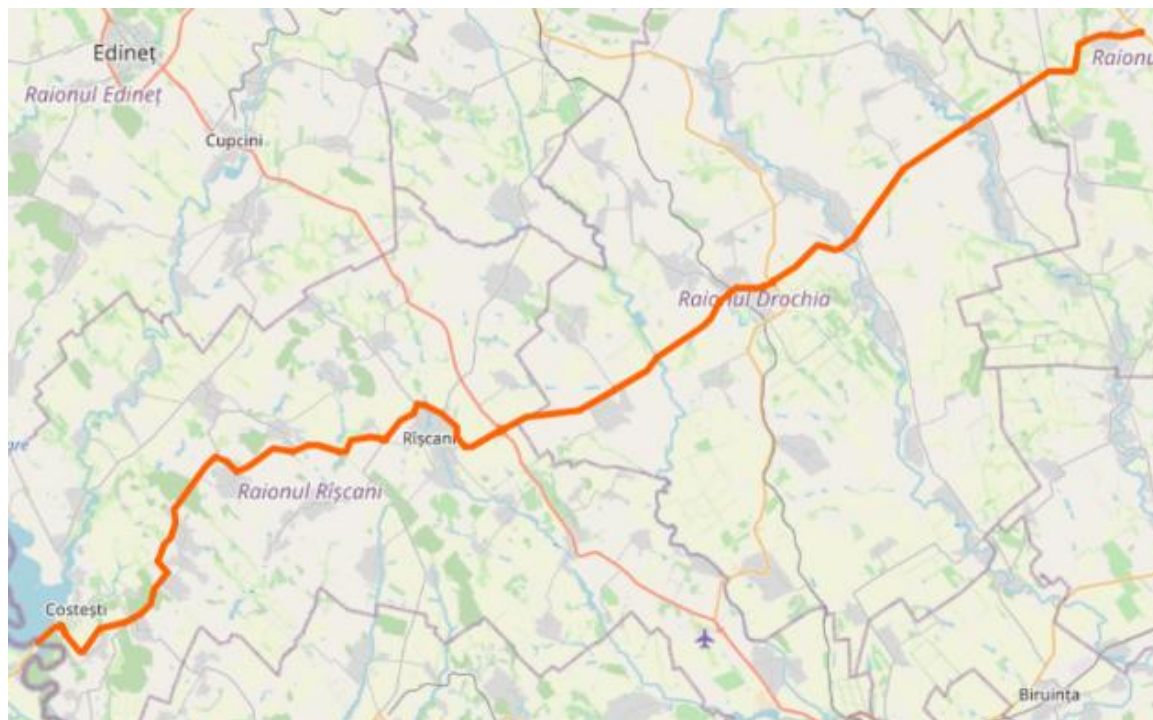
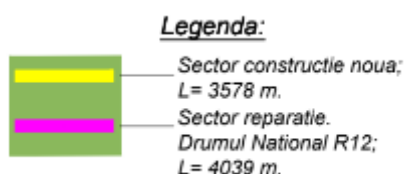


Figure 2-2: Geographical representation of R7 road

One of the main interventions of the project is construction of the Drochia bypass, lot 4, see below.



Figure 2-3: visualisation of Drochia bypass, Lot 4



At present, Drochia district has no bypass road, and all traffic—including transit traffic—passes through the town centre. The planned construction of a Drochia bypass therefore aims to divert transit flows and significantly reduce congestion within the urban area. The Drochia bypass is located to the south and southeast of Drochia town and consists of two main components:

- **Rehabilitation section** – The section begins at km 37+300 of road R12 (R8 Dondușeni – Drochia – Pelinia – M5), at the roundabout intersection with road R7/R14 (Drochia – Costești – state border with Romania), at km 29+420. It follows the existing R12 alignment and ends at km 41+450, at the intersection with local road L118, which provides access to Drochia town. Length: 4.15 km
- **New construction section** – This section starts at the intersection of R12 with local road L118 (chainage km 0+000) and continues across extravilan land belonging to Drochia town and nearby villages (Țarigrad and Micurin). It connects back to road R7 at km 33+270. Length: 3.58 km

The construction of the bypass represents a significant infrastructure investment with multiple benefits,

including:

- **economic development** through improved traffic flow and increased investment attractiveness;
- **enhanced road safety** by reducing heavy traffic and accident risks within the town;
- **improved quality of life** through decreased air pollution and noise levels.

Overall, the bypass constitutes a strategic intervention aimed at improving traffic conditions, environmental performance, and urban livability in Drochia. For more details on R7 and its lots, please refer to the ESIA R7.

2.3. ESIA, key Environmental and Social risks and impacts

For this project, an Environmental and Social Impact Assessment (ESIA) has been conducted by the company MM Consultants and Engineering, registered in Republic of Moldova. This company is active in the mobility sector and is well familiar with the key stakeholders in the country and the key environmental and social aspects connected to road rehabilitation and development of new infrastructure projects. The ESIA is structured in line with the EBRD requirements, providing a detailed description of the project, per lot, an overview of the proposed interventions, alternative analysis, an overview of the environmental, biological and social baseline with corresponding Area of Influence, it presents the results of the impact assessment and proposed mitigation measures. The ESIA includes a detailed chapter on the proposed mitigation as well as monitoring measures, and the project ESMP. A dedicated Stakeholders Engagement Plan for this project has been developed and attached to the ESIA with the results of the engagements conducted so far captured in the report.

In summary, the project key environmental and social impacts and proposed mitigation measures are:

Environmental Impacts

During construction, the principal environmental impacts relate to air quality, noise, soil and water contamination, biodiversity disturbance, and land take. Dust generation, exhaust emissions, and noise from machinery may temporarily affect nearby communities. Soil disturbance, erosion, and accidental spills pose risks to surface and groundwater, particularly near river crossings. Vegetation clearance and tree felling may affect habitats, including areas near protected and Emerald Sites.

Mitigation measures include dust suppression, proper maintenance of construction equipment, limitations on working hours near settlements, and installation of drainage controls and sediment traps. Spill prevention and emergency response procedures are required. Works near watercourses will follow strict environmental controls, including culvert and bridge upgrades to maintain natural flows. Biodiversity impacts will be managed through avoidance of sensitive areas, seasonal restrictions on vegetation clearance, compensatory tree planting, and ecological monitoring.

In operation, improved road geometry and pavement quality are expected to reduce congestion and accident risks, while residual impacts on air quality and noise are considered low to moderate and manageable.

Social Impacts

Social impacts mainly concern permanent **land acquisition, economic displacement, and temporary access disruption**. Permanent land take is expected in specific sections (notably bypass areas),

potentially affecting agricultural land users and roadside businesses, though **no physical residential** displacement is anticipated.

These impacts will be addressed through a Land Acquisition and Resettlement Framework (LARF) ensuring compensation at replacement cost, livelihood restoration where required, and transparent consultation with affected persons. Temporary access disruptions and traffic detours during construction will be minimized through traffic management planning, maintenance of access to properties and services, and advance communication with communities. A project-level grievance redress mechanism will be available throughout implementation, with particular attention to vulnerable groups.

Health and Safety Impacts

Key health and safety risks include traffic accidents, exposure of communities to construction activities, and occupational hazards for workers. Construction works increase risks to pedestrians and drivers, while workers face hazards from heavy machinery, traffic, noise, and handling of hazardous materials.

Mitigation measures include detailed Traffic Management Plans, clear signage, speed control, safe pedestrian crossings, and coordination with emergency services. Contractors are required to implement Occupational Health and Safety Management Plans, including worker training, use of personal protective equipment, emergency preparedness, and codes of conduct. Community health and safety measures will focus on reducing exposure to construction risks and maintaining road safety during and after works.

Overall Management

All mitigation measures will be implemented through the Environmental and Social Management Plan and associated sub-plans, under the supervision of the National Road Administration and project consultants. With these measures in place, residual ESHS impacts are assessed as low to moderate, while long-term effects are expected to be positive due to improved road safety, connectivity, and regional economic development.

The project will also generate positive social and economic impacts, such as improved connectivity, reduced travel time, enhanced safety, economic growth through trade facilitation and job creation and better access to schools, hospitals, and markets for rural communities.

2.4. Proposed road construction design

The project site, is mainly characterized by poor pavement conditions, including potholes, uneven surfaces, surface cracking and evidence of structural fatigue. Sections of the road vary between two-lane and dual carriageway (2x2) configuration and are mainly used by truck traffic and passenger cars. The corridor primarily runs adjacent to rural and agricultural land, while also traversing small villages and areas of environmental sensitivity, including Emerald Sites.

The road construction approach is based on rehabilitation and selective upgrading of existing road corridors, with limited new alignments where required (e.g. bypass sections), and is designed to balance technical performance, safety improvement, environmental protection, and social impact minimisation.

The project adopts **modern road engineering standards**, including pavement strengthening, geometric improvements, drainage upgrades, and safety enhancements, to ensure long-term durability and reduced

maintenance needs. The approach prioritises the rehabilitation and reuse of existing pavement layers where technically feasible. Recycling techniques (such as cold in-place recycling) are used to reduce the demand for new materials, construction waste, greenhouse gas emissions, and transport impacts. New pavement layers are designed to withstand projected traffic loads and climate conditions.

Here, a typical design intervention is presented for areas where rehabilitation works are planned.

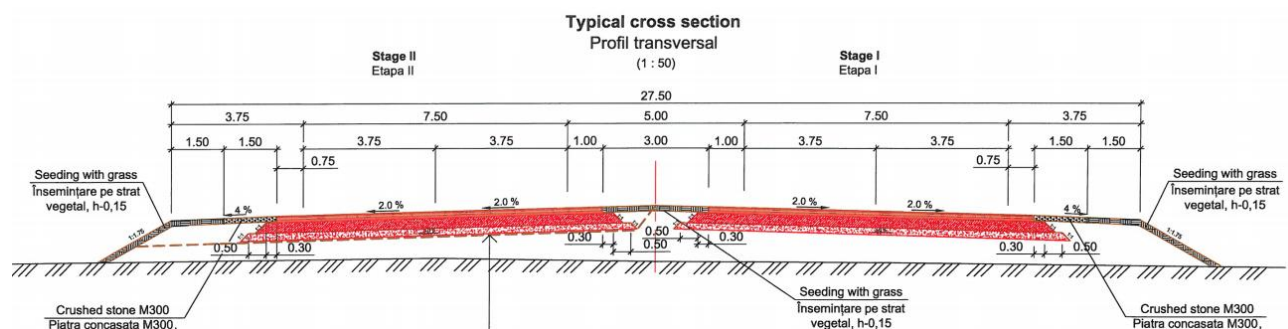


Figure 2-4: Typical cross section drawing of the road design rehabilitation works

The drawing shows a typical cross section of a road embankment built in two stages, with a total width of 27.5 m. The roadway surface slopes gently (2% near the centre and 4% toward the sides) to allow drainage, and the structure is made of compacted fill material with crushed-stone support at the lower edges. The outer slopes are covered with a 15 cm layer of topsoil and seeded with grass for stabilization. The section is symmetrical, with clearly marked widths, layer thicknesses, and side-slope angles.

It is important to note that in parallel to this E&S Requirements Compliance Assessment, an independent Road Safety Audit has been conducted by Mobility Consultants within the scope of this project (December 2025).

The key takeaways from this report are:

- Overall road condition and safety are inadequate. The existing R7 road has poor pavement condition, insufficient safety infrastructure, geometric deficiencies (curves, narrow sections, mixed traffic). This creates significant safety risks for all users (vehicles, pedestrians, etc.)
- Road function is conflicting (transit vs local access). The R7 serves two incompatible roles: high-speed transit corridor and local access road for settlements and agriculture. This leads to: speed conflicts, unsafe access points, increased accident risk.
- Accident numbers are low but severity is disproportionately high. R7 accounts for a small share of total accidents. However, fatality share is relatively high, accidents are scattered (no clear black spots), often linked to driver behaviour, visibility issues, road geometry.
- Design inconsistencies and deficiencies are widespread and a major contributor to safety risks. Across all lots, the audit identified recurring issues, e.g., inconsistent road markings and signage, poorly designed intersections and roundabouts, unsafe barrier endings, confusing or unclear traffic organization, inadequate pedestrian infrastructure.
- Significant safety improvements are feasible with targeted measures. The report shows that many risks can be mitigated with cost-effective solutions, such as, e.g., better intersection design (simplified layouts, turbo roundabouts), installation of safety islands, barriers, lighting, rumble strips, improved signage consistency, pedestrian protection and access management.

2.5. Project Categorization

According to the ESA_R7_01.05.2026 report, the project has been classified by the EBRD as a Category B project. This categorisation reflects the assessment that the project is associated with **site-specific environmental and social impacts that are largely predictable, reversible, and can be readily mitigated through standard measures**. The ESA confirms that the proposed road rehabilitation and bypass works do not entail significant, irreversible, or unprecedented impacts, nor do they involve extensive resettlement or impacts on critical habitats that would warrant a Category A classification. The Category B classification is appropriate based on currently identified impacts; however, certain sections of the project—particularly those connecting to international borders—present elevated uncertainty and sensitivity (potential increased traffic, community impacts, increase of cumulative impacts). These risks require robust framework instruments, enhanced supervision, and confirmation through detailed design and lot-specific assessments, once these are available. As a Category B project:

- An Environmental and Social Assessment (ESA) is required rather than a full Environmental and Social Impact Assessment (ESIA).
- Identified risks and impacts are addressed through Environmental and Social Management Plans (ESMPs) and related instruments (such as the LARF).
- The project is required to comply with the EBRD Environmental and Social Policy, including the applicable Performance Requirements, particularly PR1 (Assessment and Management of Impacts), PR4 (Health and Safety), and PR5 (Land Acquisition and Resettlement).

The report concludes that, with the proposed mitigation and management measures fully implemented, the project is expected to remain compliant with EBRD requirements and result in overall positive long-term environmental and social outcomes.

3. Project Compliance with EBRD standards

This chapter presents a systematic review of project compliance with the EBRD Environmental and Social Policy, as defined through the applicable Environmental and Social Requirements (ESRs).

3.1. Methodology

This review is structured using Annex 5 of the document titled '*TERMS OF REFERENCE, Environmental and Social Due Diligence, Impact Assessment and Road Safety Audit for the Moldova TEN-T Road Network Rehabilitation Project, DTM 55768*' provided by the EBRD.

In line with the guidance given in that document, the following steps were completed for each indicator within the ESRs:

1. *Decide whether the indicator is applicable.* For Category A projects, the starting point is that all indicators are applicable unless the project has no significant aspects relevant to the indicator (i.e.

no risks), in which case the indicator should be scored **"NA"** and a brief summary of the reason given.

2. *Decide whether an opinion is possible.* If not (for example if the indicator will apply, but it is too early in the project) score as **"NOP"** and provide a brief summary of why. Where lack of opinion represents a material omission to the review refer to where this is addressed in the report and summarise any recommendations.
3. *Score the indicator as follows and provide brief justification.*

EC	<i>Exceeding Compliance:</i> The project has gone beyond the expectations of EBRD's ESRs requirements. EBRD should be able to use projects rated EC as a role model for positive Environmental and Social effects.
FC	<i>Fully Compliant:</i> The project is fully in compliance with EBRD's requirements, and EU and local environmental, health and safety policies and guidelines.
PC	<i>Partial Compliance:</i> The project is not in full compliance with EBRD's requirements, but has systems, processes or mitigation measure in place which are working towards addressing the deficiencies.
MN	<i>Material Non-compliance:</i> The project is not in material compliance with EBRD's requirements, and the systems, processes and mitigation measures in place are not working towards addressing the deficiencies.

4. *Comments/Issues: Provide a brief commentary on the relevance of this requirement for the project and an explanation of the chosen score.*
5. *Actions Required: Where applicable, briefly describe any actions required by the client to achieve full compliance with each requirement. Where a relevant action is already included in (or related to) the existing ESAP for this project, a reference to the ESAP is provided in the last column of the table.*

Note: The Material Non-compliance score (at both Indicator and ESRs level) has significant implications for Project approval and requires particular care. In judging whether the measures sufficiently address deficiencies, the consultant should consider in a structured way both the level of residual (post-approval) risk and the level of confidence that the Project can successfully bring the issue into compliance with the EBRD E&S Policy through ESAP. The table below illustrates the approach to be taken.

Risk	High	PC	MN	MN
	Medium	PC	PC	MN
	Low	FC	PC	PC
		High	Medium	Low
		Confidence		

3.2. Environmental and Social Appraisal

Table 3-1: ESR Appraisal R7

KPI Ref.	Environmental and Social Requirements	Score	Comments/ Issues	Actions Required	ESAP Ref.
1	Assessment and Management of Environmental and Social Risks and Impacts				
	Summary: The ESR 1 is in partial compliance. An Environmental and Social Assessment is in place, which describes the project, the environmental, biological and social context and baseline, defines the Area of Impact, the key environmental and social risks and impacts, assess them in the project context and proposes the required mitigation and monitoring measures. Several gaps do exist especially in terms of setting up and operating the project from an Environmental and Social Management System perspective. Certain impacts could not be assessed at this stage and require revisiting the project and its impact on the environment and surrounding communities in due course when more details on the project are known.				
1.1	Environmental and Social Assessment	PC	An Environmental and Social Assessment has been conducted by the company MM Consultants and Engineering for the project. This company is active in the mobility sector and is well familiar with the key stakeholders in the country and the key environmental and social aspects connected to road rehabilitation and development of new infrastructure projects. The ESA is structured in line with the EBRD requirements, providing a detailed description of the project, per lot, an overview of the proposed interventions, alternative analysis, an overview of the environmental, biological and social baseline with corresponding Area of Influence, it presents the results of the impact assessment and proposed mitigation measures. The project description chapter is sufficiently detailed. The environmental baseline covers physical environmental elements (ambient, air, noise, soil, water resources, etc). The biodiversity, flora and fauna and potentially affected habitats including Emerald and nationally protected sites are well covered. The social baseline, described in the report covers the demographic and socio-economic characteristics of the project area, which is predominantly rural and semi-urban, with stable but ageing populations and outward migration of younger residents; it outlines settlement patterns aligned closely with the existing road network, land use dominated by fragmented agricultural plots under mixed private and public ownership, and livelihoods largely dependent on agriculture, small-scale farming, roadside businesses, and local services, with particular attention to vulnerable groups such as elderly landowners, low-income households, and subsistence farmers; it also reviews access to social infrastructure and public services, mobility patterns including reliance on public transport and pedestrian movement, existing road safety issues—especially in villages—and community perceptions that generally support road rehabilitation while expressing concerns about land take, construction disturbance, and maintaining access during works.	Since the exact location of the labour camps are not known yet, including any project associated facilities that could be developed connected to the camp and project activities (e.g., access roads, utility connections, etc), the impact assessment from these facilities shall be revisited and ESMP updated accordingly.	1

KPI Ref.	Environmental and Social Requirements	Score	Comments/ Issues	Actions Required	ESAP Ref.
			The ESA relies predominantly on secondary data sources—such as national statistics, regional socio-economic data, existing planning documents, and previous studies—combined with limited stakeholder engagement activities. These activities mainly included consultations with institutional stakeholders and local authorities, as well as community consultations undertaken as part of the broader project information and disclosure process. The alternative analysis is sufficiently covered in the ESA and includes technical alternatives for the method of rehabilitation and route alternative for Drochia bypass. The project area of influence is based on direct and indirect impacts for various environmental and social aspects and receptors. The ESA methodology and impact assessment follows a structured and logical approach. The ESA includes a detailed chapter on the proposed mitigation as well as monitoring measures, and there is a project Environmental and Social Management Plan (ESMP). The ESMP is clear in listing the impacts, the required mitigation and monitoring measures, as well as roles and responsibilities. A dedicated Stakeholders Engagement Plan for this project has been developed and attached to the ESA with the results of the engagements conducted so far captured in the report. Most of the works are planned within the existing right-of-way (except Lot 4) and mitigation measures has been determined and planned (ESMP, CESMP). The project will provide long-term benefits: improved connectivity, safety, and economic growth. The exact location of the construction camp and project associated facilities are not known at this stage. It is assumed that an EPC contractor will be hired that will be in charge of setting up the construction camp with all the required facilities, utilities and laydown areas. The ESA provides sufficient details on the requirements for this camp. However, since the exact location is not known yet, the impact assessment from this facility shall be revisited and ESMP updated accordingly.		
1.2	Environmental and Social Management Systems	PC	The NRA operates under a structured Internal Management Control System (ICM) which is the official management and governance system used by all public institutions in the Republic of Moldova. It is required by Moldavian Law 229/2010 on Internal Public Financial Control. The ICM does not however manage any environmental or social risks. It however focuses on governance, legality and	NRA to develop an Environmental and Social Management System. The system with its procedures and policies, shall be applicable to this project and any other project developed in line with the Lenders requirements.	2

KPI Ref.	Environmental and Social Requirements	Score	Comments/ Issues	Actions Required	ESAP Ref.
			compliance, financial integrity, performance, fraud and corruption prevention, internal controls and documentation and monitoring.		
1.3	Environmental and Social Policy ³	PC	During the interview with the NRA conducted as part of the October E&S Audit and Site Visit, the NRA indicated to have provisions covering the requirements of an environmental policy and have certain internal procedures (standards operating procedures for construction and maintenance of the roads) that are aligned with the requirements of the ISO 14001 on Environmental Management System and best practice for environmental protection. Nevertheless, NRA indicated that they miss a comprehensive an integral environmental management system with corresponding dedicated policies to manage the environmental and social aspects in a systematic way. Further, the actual environmental policy has not been provided as evidence.	Develop an Environmental and Social Policy that will be applicable to this project as well. Communicate the E&S policy to relevant stakeholders, contractors (include the policy in the bidding documents).	Covered under ESAP nr 2
1.4	Environmental and Social Management Plan	FC	An Environmental and Social Management Plan is included in the ESA. The study provides description of the impacts and required mitigation measures. The ESMP is structured into: - Activities/ receptors/sensitive zones - Requirements (what must be done), Mitigate the impact (e.g., Avoid, Risk reduction), Phase (Pre-construction/Construction/Operation), and Responsible (Contractor; Environment Agency/forestry enterprises/NPAs/scientific institutions), making responsibilities and timing explicit. - Mitigation entries are complemented elsewhere by the Monitoring Plan table, which specifies indicator/parameter, location, frequency, monitoring type, responsibility, and cost, providing traceable verification of compliance. The ESMP and associated chapters in ESA, e.g., chapter 7 Management of impacts and issues, chapter 8 Monitoring and supervision are sufficient in terms of structure and coverage. Specific gaps identified per receptor/activity are listed further in this report – e.g., under PR 3, 5, 6 among others.	-	-
1.5	Organisational Capacity and Commitment	PC	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 organisation present with NRA is sufficient to manage the E&S risks in organisation projects. However, during the interview conducted with the NRA E&S specialist as part of the October Audit and site visit, the competence of the E&S specialists was tested on Lenders, e.g., EBRD E&S requirements. Questions were posed on E&S specialists understanding of these requirements	NRA E&S specialists shall seek training and technical assistance to increase their understanding of EBRD requirements 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. Such training	3

KPI Ref.	Environmental and Social Requirements	Score	Comments/ Issues	Actions Required	ESAP Ref.
			and how these are translated into projects financed by the Lenders and their monitoring. The specialists indicated to be mainly guided by the national legislation requirements. For instance, in this case the requirements derived from the ESIA study and ESMP are the prevailing requirements. Evidence was requested on project monitoring based on international best practice, but this has not been provided. NRA has insufficient tools and mechanisms to cascade down the Lenders requirements into project / NRA/ Contractors' documents and efficiently monitor their implementation	shall go hand in hand with the development of guiding materials, in-house check lists and other tools / mechanisms that will aid efficient implementation and monitoring.	
1.6	Supply Chain Management	PC	Reportedly NRA has procurement procedure where supply chain requirements are embedded. However, the copy of the supply chain policy / procedure has not been provided, and its implementation could not have been verified.	Develop Supply Chain Policy and cascade to contractors and each subcontractor.	4
1.7	Project Monitoring and Reporting ⁴	FC	The ESA, ESMP and detailed management plans foresee the following requirements on project monitoring and reporting: - Regular site inspections: Work sites, camps, storage facilities, and installations must be checked frequently for compliance. - Community engagement: Consultations with local communities near work sites to gather feedback on environmental and social issues. - Document review: Verification of environmental records such as waste logs, spill reports, and material delivery documentation. - Visual checks: Observations for non-compliance or risks (e.g., dust, leaks, waste mismanagement). - Quantitative monitoring and record of KPIs: Air, noise, vibration, and water quality sampling by accredited laboratories, following national standards. Project monitoring is vested with the contractor who implements monitoring and bears costs, with an Owner's Engineer who approves sampling points and reports to NRA, National authorities and lenders to conduct audits and verify compliance with permits and EBRD Environmental and Social Requirements. Regular environmental and social performance reports must be submitted by the Supervision Company to the National Road Administration (NRA) and lenders. Reports include monitoring results, compliance status, and corrective actions taken. Monitoring plans and cumulative impact assessments should be disclosed	-	-

KPI Ref.	Environmental and Social Requirements	Score	Comments/ Issues	Actions Required	ESAP Ref.
			publicly. Coordination committees with other infrastructure implementers are recommended for sharing data and mitigation commitments. Project monitoring and reporting requirements are sufficient and well covered.		
2	Labour and Working Conditions				
	Summary: ESR 2 is in partial compliance. Although Moldova's national laws align with ESR 2, the NRA has provided limited HR documentation and no evidence of a formal labour management system to demonstrate practical application of these standards. Various gaps have been identified connected to Human Resources Policies and procedures, their availability and alignment with ESR 2 requirements. To achieve compliance, the NRA should develop comprehensive HR policies and an HR management system and update their Code of Conduct and FDIC contract. Furthermore, a project specific workers grievance redress mechanism and register needs to be developed and shared with the contractor/subcontractor.				
2.1	Human Resource Policies and Working Relationships	PC	The NRA has a publicly available Code of Conduct that sets out the organisation's ethical standards and behavioural rules for all employees. The Code of Conduct is not fully aligned with ESRs 2 and misses provisions on Child and Force labour prohibition, Freedom of Association and Collective Bargaining, Employment terms, fair wages and working hours, grievance mechanism, supply chain and contractor compliance, provisions on worker accommodation (if applicable). The NRA reported to have an Environmental, Social, Health and Safety (ESHS) Policy 'Framework' according to the World Bank's Environmental and Social Requirements. However, the policies and management system as described in the framework have not been shared and it was not possible to verify if the NRA has such policies or systems in place, their actual alignment with Lenders Requirements and their efficiency. No other human resource policies or evidence of a formal HR / labour management system was provided by the NRA. No employment contracts were shared by the NRA. The NRA commented in the Request for Information, that the contractor is responsible for the employment contract and their involvement in overseeing contractor workers aspects are limited. The NRA uses the FIDIC Red Book⁵ as template for the contract and as legal document with its contractors. The FIDIC Red Book is not completely aligned with	1. Develop and implement Human Resource / labour management system and HR policies in line with ESRs 2. The management system should include labour procedures, contract oversight, grievance mechanism, monitoring, reporting and inspections, working condition standards, GBVH safeguards, OHS integration and supply chain controls. 2. Update the NRA Code of Conduct to align it with ESRs 2. Include provisions on Child and Force labour prohibition, Freedom of Association and Collective Bargaining, Employment terms, fair wages and working hours, grievance mechanism, supply chain and contractor	5, 6

⁵ 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 project-specific Environmental & Social (E&S) requirements. These need to be provided by the Employer, in this project case – the NRA.

KPI Ref.	Environmental and Social Requirements	Score	Comments/ Issues	Actions Required	ESAP Ref.
			PR2, as it does not include an explicit prohibition of child or forced labour, does not provide an anonymous and accessible worker grievance mechanism, lacks specific requirements on ethical recruitment and passport retention, and does not cover contractor and supply-chain oversight in the manner required by PR2.	compliance, worker accommodation (if applicable). 3. Update and include additional clauses to FIDIC Contract with contractors including prohibition of child and force labour, ethical recruitment clauses, grievance mechanism requirements, passport/document retention prohibition, contractor obligation to meet ESR2 to all employees and subcontractors, supply-chain labour due diligence obligations, age-verification procedure, requirement to develop a Contractor Labour Management Plan, regular reporting and labour audits by the Contractor. 4. Include ESRs2-related labour and working-conditions monitoring responsibilities in the Owner's Engineer's Terms of Reference, including reviewing grievance records and monitoring compliance of ESRs 2 labour requirements.	
2.2	Child and Forced Labour	MNC	The NRA have not provided any policies or procedures explicitly prohibit child or forced labour. Moldova is signatory to the ILO convention on Minimum Age and Worst Forms of Child Labour as well as Forced Labour which have been implemented into national labour law. Furthermore, the Collective Agreement for the Construction Sector (2023 - 2027) explicitly addresses child labour protections.	1. Update the Code of Conduct explicitly prohibiting child labour or any employment of persons under the age of 18 for Hazardous work. 2. Include ESRs2 clauses into the FIDIC Redbook Contract requiring contractors and subcontractors to	Covered in ESAP 5 and 6

KPI Ref.	Environmental and Social Requirements	Score	Comments/ Issues	Actions Required	ESAP Ref.
				implement an age-verification procedures and prohibit all forms of child and forced labour. 3. Include in the Terms of Reference of the Owner's Engineer to monitor the contractor and subcontractor on compliance with age-verification, recruitment practices, and overall labour standards.	
2.3	Non-Discrimination and Equal Opportunity	PC	The NRA's Code of Conduct contains a clear non-discrimination clause and equal employment opportunity commitment. The FIDIC Redbook contract relies on compliance with Moldova's labour law however ESR 2 expects explicit non-discrimination and equal opportunity safeguards.	Include clauses in the FIDIC Redbook requiring contractors and subcontractors to implement non-discriminatory hiring, employment and treatment of workers and to ensure fair and equal access to opportunities, training and wages.	Covered in ESAP 5 and 6
2.4	Workers Organizations	PC	The NRA Code of Conduct does not address workers' right to freedom of association or collective bargaining. The FIDIC Redbook does not reference the freedom of association, right to join trade unions or collective bargaining. The Redbook does require contractors to comply with applicable national labour laws which does includes these rights.	1. Update the Code of Conduct to include the right to the freedom of association and collective bargaining. 2. Include a clause in the FIDIC Redbook explicitly mentioning the right to the freedom of association, join a trade union or collective bargaining.	Covered in ESAP 5 and 6
2.5	Wages, benefits, and conditions of work and accommodation	PC	The Code of Conduct does not address wages, benefits of work, or worker accommodation. The FIDIC Redbook Clause 6 does cover basic labour related requirements such that the contractor must follow national labour laws related to wages, working hours and conditions. Contractor must pay rates and observe conditions that comply with applicable labour laws. Furthermore, clause 6.6. requires Contractors to provide necessary welfare facilities and accommodation but does not specify standards. National labour law in Moldova established a 40-hour work week and requires premium pay for overtime. Furthermore, the law also sets a minimum wage that meets national standards.	1. Update Code of Conduct to address wages, benefits of work and worker accommodation standards as per ESR2. 2. Include in the FIDIC Redbook contract minimum standards aligned with <u>EBRD Workers' Accommodation: Processes and Standards.</u>	7

KPI Ref.	Environmental and Social Requirements	Score	Comments/ Issues	Actions Required	ESAP Ref.
2.6	Collective Dismissals	MNC	None of the documents provided by the NRA contain any information or procedures related to collective dismissals.	Develop a collective dismissals procedure in line with ESR 2 and incorporate it into the HR policy and the HR Management System. Ensure the procedure includes an analysis of alternatives before implementing a collective dismissal procedure.	Covered in ESAP 5 and 6
2.7	Grievance Mechanism	MNC	The NRA Code of Conduct contains ethic-related reporting procedure but no anonymous or accessible grievance redress mechanism for labour issues.	1. Develop a worker/labour grievance mechanism and register as part of the HR /Labour Management System which is communicated to its own employee, as well as shared with contractors and subcontractors. 2. Include provision in the FIDIC Redbook contract requiring contractors and subcontractors to have an anonymous and accessible grievance redress mechanism procedure and formal register of the grievances. Ensure that NRA has access and receives a copy of the contractor workers GRM.	Covered in ESAP 5 and 6
2.8	Contracted workers	PC	The NRA has indicated that in the tender process to select a contractor they include ESHS requirements that the bidder must meet such as ISO 14001, OHSAS 18001/ISO 45001 or own written policies and procedures if they don't have certificates. Furthermore, the bidder must show they have done at least one similar project safely and in line with international standards. Lastly, the bidder must submit an ESHS plan. No ESR 2 Labour requirements are included in the tender documents/ procedures. <i>The client will use reasonable efforts prior to contracting to: (i) assess the past performance of these contractors or intermediaries with regard to employment and occupational health and safety, to establish their current capacity to implement the requirements of this ESR and ESR 4; and (ii) contractually require the contractor or other intermediary to apply relevant requirements of this ESR and ESR 4</i>	Include ESR2 labour clauses in tender documents. Require the bidder to show past compliance with ESR2. Undertake contractor labour performance as part of the selection process.	Covered in ESAP 5 and 6
2.9	Supply Chain	PC	See 2.8 above. Nevertheless, the NRA did not provide a supply chain labour requirement, or any controls measures in place.	Include clause in the FIDIC Contract requiring contractors to ensure their primary supplies are free from child and forced labour. Include a requirement of contractors to include risk screening of new suppliers.	Covered in ESAP 5 and 6

KPI Ref.	Environmental and Social Requirements	Score	Comments/ Issues	Actions Required	ESAP Ref.
3	Resource Efficiency and Pollution Prevention and Control				
	Summary: ESR 3 is in Partial Compliance. Several actions have been identified with respect to resource efficiency, GHG, waste facilities (solid and liquid waste), use of the chemicals that need to be detailed to ensure project alignment with ESR 3 requirements.				
3.1	Resource Efficiency	MNC	Due to the stage of the project development, resource efficiency is not addressed in the ESA.	Include requirements for resource efficiency in the Contractor ESMP and construction management plans, focusing as minimum on water recycling and water efficiency measures (due to water scarcity in the country especially in the summer periods).	8
3.2	Pollution Prevention and Control - Air emissions	FC	Water sampling, air sampling, soil sampling, and noise is still to be conducted and the will be ESA updated. Water sampling will be conducted from wells, to understand the physic -chemical and biological properties of the water. Samples from river will be tested on physic chemical properties. For R7 - 12 water samples will be done, 8 well and 4 rivers. Ambient Air quality The air quality within the R7 project corridor is generally good, reflecting the predominantly rural and small-town character of the area and the absence of major industrial emission sources. Existing air quality conditions are mainly influenced by road traffic, local heating systems, and agricultural activities. Elevated concentrations of pollutants such as particulate matter (PM) and nitrogen oxides (NO_x) are limited to settlements and town centres, where traffic congestion and stop-and-go driving occur, particularly along sections where the road passes directly through populated areas. A baseline air quality monitoring campaign was undertaken by GEOSTUD S.R.L. on 26–27 May 2026 to establish ambient air quality conditions along the R7 road corridor. Air quality measurements were collected at representative locations along the project alignment, including settlements, road intersections and environmentally sensitive areas, and analysed for key traffic-related pollutants, namely sulphur dioxide (SO₂), nitrogen dioxide (NO₂), nitrogen monoxide (NO), particulate matter (PM₁₀) and fine particulate matter (PM_{2.5}). The monitoring results indicated that all measured pollutant concentrations were below the applicable limit values established under Moldova's Law No. 98/2022 on Ambient Air Quality. Measured concentrations of PM₁₀ and PM_{2.5} were particularly low, with values reported below 1 µg/m³ at all sampling locations, while SO₂ and NO₂ concentrations were also significantly below regulatory thresholds. The measured	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 were national and EU thresholds are likely to be exceeded. Update the ESMP and implement additional mitigation measures (e.g., temporary noise barriers).	9

KPI Ref.	Environmental and Social Requirements	Score	Comments/ Issues	Actions Required	ESAP Ref.
			concentrations are also in compliance with the EU Ambient Air Quality Directive values (Directive 2008/50/EC). On this basis, the baseline survey concluded that ambient air quality within the project area is generally good and that no significant atmospheric pollution sources are currently affecting the corridor. During the construction phase, temporary and localised impacts on air quality are expected. These include dust emissions from earthworks, material handling, and unpaved surfaces, as well as exhaust emissions from construction machinery, vehicles, and asphalt works. The impacts are anticipated to be short-term, reversible, and confined to the immediate vicinity of construction activities, with higher sensitivity in residential areas, villages, and near social infrastructure. In the operational phase, air quality impacts are assessed as minor and not significant. Although traffic volumes may increase along upgraded road sections, improved road geometry, pavement condition, and more efficient traffic flow are expected to reduce congestion and idling. The construction of the bypass sections, notably around Drochia, is expected to improve air quality within urban areas by diverting transit traffic away from town centres. Mitigation measures focus primarily on the construction phase and include dust suppression through watering, covering of transported materials, maintenance of construction equipment to control emissions, and speed limits on unpaved access roads. With these measures in place, residual air quality impacts are assessed as low, and the project is expected to deliver a net long-term air quality benefit in settlement areas. . Ambient Noise level The noise along the R7 corridor is shaped primarily by road traffic, reflecting the rural and small-town context of the project area. Background noise levels are generally low to moderate in open rural sections, increasing within villages and town centres where traffic passes close to residential properties, schools, healthcare facilities, and other sensitive receptors. In locations where the existing road runs directly through settlements, traffic-related noise is already a recognised nuisance, particularly during peak hours and for heavy vehicles. A baseline noise monitoring campaign was undertaken as part of the Environmental and Social Assessment to establish existing acoustic conditions along the R7 road corridor. Noise measurements were conducted at representative sensitive receptors, including residential areas, settlements located adjacent to the road, and other noise-sensitive locations within the project area. The same spot locations were covered as for air quality measurement campaign - 8 locations. The monitoring programme aimed to characterise existing ambient noise levels		

KPI Ref.	Environmental and Social Requirements	Score	Comments/ Issues	Actions Required	ESAP Ref.
			associated with current road traffic and local activities and to provide a reference for the assessment of future project-related impacts. The baseline results indicate that noise levels are primarily influenced by existing road traffic, with the highest values recorded in proximity to settlements and road intersections. Overall, the measured noise levels were found to be generally consistent with applicable Moldovan noise standards and broadly aligned with the guideline values set out in the EU Environmental Noise Directive (2002/49/EC) and relevant international good practice for residential receptors. During the construction phase, temporary noise and vibration impacts are expected as a result of earthworks, pavement removal, material transport, and operation of heavy machinery. These impacts are anticipated to be localised, intermittent, and temporary, with the highest potential effects occurring near residential areas and social infrastructure located close to the road alignment. While construction noise may cause short-term disturbance, it is not expected to result in permanent changes to baseline noise conditions. In the operational phase, noise impacts are assessed as generally low to moderate. Although traffic volumes are expected to increase in line with improved road capacity and functionality, smoother traffic flow, improved road surface quality, and better road geometry are expected to reduce noise associated with braking, acceleration, and stop-start conditions. Importantly, the construction of bypass sections—particularly around Drochia—is expected to reduce noise levels in urban centres by diverting transit and heavy traffic away from densely populated areas. In areas along new or upgraded sections, operational noise increases are expected to remain within acceptable limits. Mitigation measures focus largely on the construction phase and include limiting noisy activities to daytime hours near settlements, maintaining construction equipment in good working condition, and applying good site management practices. For operation, noise is managed through appropriate road design, pavement quality, and traffic management. With these measures in place, residual noise impacts are assessed as acceptable and manageable, with an overall long-term net benefit expected for communities currently exposed to high levels of through-traffic noise. Traffic forecast The report addresses future traffic on the R7 in a qualitative and forecast-based manner, rather than through detailed independent traffic modelling. The ESA indicates that traffic volumes on the R7 are expected to increase in the future, driven by a combination of improved road conditions, regional connectivity, and the strategic role of the corridor. The rehabilitation and upgrading of the road		

KPI Ref.	Environmental and Social Requirements	Score	Comments/ Issues	Actions Required	ESAP Ref.
			are expected to enhance safety, capacity, and travel reliability, which in turn is likely to attract higher traffic volumes over time compared to current conditions. The report expects moderate future traffic growth on the R7, linked to improved infrastructure and strategic function, with a shift of traffic away from town centres and onto bypasses and upgraded sections. While traffic increases are anticipated, they are considered within planned design assumptions and are not expected to result in significant adverse environmental or social impacts.		
3.3	Pollution Prevention and Control - Waste waters	PC	The project will generate waste effluent from the construction camp: • Domestic wastewater • Industrial wastewater from track wash bay, contaminated effluent from workshop, cement production bay, etc. During the road operation, limited amount of waste effluent will be generated (e.g., from road maintenance). Nevertheless, this shall be properly contained and disposed at dedicated waste treatment facilities. Due to the size of the worker camp and construction activities, the most feasible option is to collect the wastewater in tanks with sub-subsequent extraction and treatment at dedicated wastewater facilities (e.g., septic tank construction). No discharge of untreated wastewater shall be allowed. Soil baseline and impact assessment is included in the ESA. The impact assessment and proposed mitigation measure seem sufficient. Soil sampling will be conducted, in total 8 soil samples are foreseen. Including sampling of the soil where the new road will be built – the Drochia bypass. Soil sampling will be conducted at 2 depths per location, and will be analysed on physical properties, heavy metals and hydrocarbons.	Undertake soil sampling for the Drochia bypass – new section to be constructed before the construction (to detect any contamination with hydrocarbons and/or heavy metals).	10
3.4	Greenhouse Gases ⁶	FC	In line with EBRD policy, GHG calculations are not mandatory for this project and are not included in the ESA. A qualitative assessment of emissions sources and climate considerations is included and compliant for a Category B road project.	As part of the overall GHG system for all roads under NRA, now recommended for M3.	-
3.5	Water	PC	The impact of technical water demand for the construction works needs be re-assessed at the time of project realisation considering water scarcity characteristic for the south of Moldova.	The impact of technical water demand for the construction works needs be re-assessed at the time of project realisation, especially in terms of water availability to local communities.	Covered by ESAP #8
3.6	Wastes	PC	The ESA provides a list of potential waste streams to be generated by the project and indicates the regulatory requirements for waste disposal.	Undertake an independent audit of the existing waste facilities that will be employed	11

KPI Ref.	Environmental and Social Requirements	Score	Comments/ Issues	Actions Required	ESAP Ref.
				by the Contractor / potentially overlapping with the one currently used by NRA for disposal of waste generated during road maintenance operation - to verify and ensure these facilities have sufficient capacity and proper design to treat and dispose waste. Waste records shall be produced and kept for the complete duration of the construction phase.	
3.7	Hazardous Substances and Materials	PC	The ESA recognizes hazardous materials as a key risk for environmental contamination and worker hazards and prescribes measures for storage, handling protocols, and emergency response measures to minimize soil and water contamination and protect community health. Recommendations about the application of the Material Safety Data Sheets (MSDS) are included under EBRD standard 4 (item 4.4) and shall be adopted by the project.	-	Captured in ESR 4
4	Health, Safety and Security				
	Summary: ESR 4 is in Partial Compliance with most of the items in full compliance. The project road design as proposed in this project is aligned with the industry best practice. However, there are several improvements needed to address the road safety aspects. The ESA does not include a climate change risk assessment, and this is required since landslides, river flooding are typical for Moldova. We recommend such assessment to be undertaken at the time of the detailed design and any adjustments to the road design to be processed accordingly by the technical team. The ESA already provides templates for several OHS and community related management plans. These shall be adopted by the project and developed in specific detailed management plans before construction starts.				
4.1	Occupational Health and Safety	FC	The ESA addresses Occupational Health and Safety (OHS) aspects in a detailed and structured manner, consistent with EBRD ESR 2, 4 and national legislation. Additionally, the framework for the Occupational Health and Safety Management Plan is provided and is sufficient for this stage of project development.	Develop a project specific Occupational Health and Safety Plan.	12
4.2	Community Health and Safety	FC	The EIA addresses Community Health and Safety in a detailed and structured manner, consistent with EBRD ESR 4 and national legislation. Additionally, the framework for the Community Health and Safety Management Plan is provided and is sufficient for this stage of project development.	Develop a project specific Community Health and Safety Plan.	13
4.3	Infrastructure, Building, and Equipment Design and Safety	FC	ESA indicates the road design and construction alignment with EU standards and best practice: - It confirms that mandatory compliance with European EN standards was introduced through the Technical Regulation on the Minimum Requirements for the Marketing of Construction Products (GD No. 913/2016), effective from 1 January 2021. - The Ministry of Economy and Infrastructure approved a list of harmonized standards in February 2021, replacing obsolete national norms and	-	-

KPI Ref.	Environmental and Social Requirements	Score	Comments/ Issues	Actions Required	ESAP Ref.
			ensuring that all new road-construction materials and designs meet EU performance and durability criteria. - The ESA emphasizes that all new investments in road design and construction must align with these standards, ensuring compatibility with European requirements and enhancing resilience and quality of works. - Additionally, the document refers to CP D.02.30:2023 Regulations on environmental protection in the design, construction, modernization, rehabilitation and maintenance of roads, and mentions adherence to the Code of Practice for Architectural and Landscape Design of Roads, which includes recommendations for safety, environmental protection, and operational quality. The final road design shall consider the improvements and findings of the Road Safety Audit, see section 2.4 of this report. This shall be processed during the detailed design. This action is outside the scope of this assessment. These are addressed by the stand-alone Road Safety Audit.		
4.4	Hazardous Materials Safety	PC	See point above on Project design and alignment with Industry Best Practice with specifics on material safety, environmental protection, and operational quality. Furthermore, the ESIA provides sufficient requirements for the operational health and safety and use of chemical substances. Additional measures are listed in the: - Environmental and Social Management Plan (ESMP) - Occupational Health and Safety Management Plan (e.g., risk assessment, PPE, Work Permit procedure, Includes incident reporting and root cause analysis for chemical-related accidents) - Pollution Prevention Management Plan (e.g., secure, bunded storage for hazardous materials, spill kits, training for workers) - Emergency Response (e.g., spill kits and first-aid stations, spill response procedures) - Waste Management Plan (e.g., secure storage, bunding, and labelling of hazardous waste containers with UN hazard codes.)	Add the requirement for keeping Materials Safety Data Sheets (MSDS) for all hazardous substances on-site. Add training workers on MSDS content. Include the requirement for the MSDS in the Contractor's Environmental and Social Management Plan (C-ESMP).	Covered in ESAP #12
4.5	Product and Services Safety	PC	See 4.3 and 4.4	-	-
4.6	Traffic and Road Safety	PC	The ESA and ESMP provide a robust and well-structured approach to Traffic and Road Safety, aligned with EBRD PR4 (Health, Safety and Security) and good international industry practice. The ESA includes a Construction traffic management plan (Annex 1.3 – ESMP) which requires detailed layout drawings for diversions, pedestrian	Develop a project specific Traffic Management Plan .	14

KPI Ref.	Environmental and Social Requirements	Score	Comments/ Issues	Actions Required	ESAP Ref.
			routes, signage, and signal changes. It mandates advance public notifications (press releases, maps at public places), banksmen/signallers for manoeuvres, and driver rules (speed limits, seatbelts, no phone use). Weekly vehicle/plant safety checks and quantitative delay monitoring - The ESA includes community road safety measures which provides for physical barriers/fencing around works; “keep out” signage with CLO contacts. Targeted road safety awareness (schools, public meetings), temporary lighting for vulnerable areas, and controls at temporary crossing points - The topic is further cross referenced and addressed in SEP and Emergency Response Plan, OHS Management Plan. The final traffic and road safety aspects shall consider the improvements and findings of the Road Safety Audit, see section 2.4 of this report. These shall be processed during the detailed design phase of the project. These actions are outside the scope of this assessment. These are addressed by the stand-alone Road Safety Audit.		
4.7	Natural Hazards	PC	Climate hazards and road design The country is highly climate-sensitive, facing rising temperatures (projected +2–3°C by 2050), more frequent droughts, floods, and extreme weather events, which threaten infrastructure and socio-economic stability. The risks for transport infrastructure involve high summer temperatures that can deform pavements; heavy precipitation that can cause flooding, erosion, and slope instability; strong winds that can damage roadside vegetation and structures. The ESA suggest adaptation measures, e.g., Climate-resilient design (modified asphalt/concrete mixes, improved drainage, slope stabilization), Vegetative belts and reforestation to reduce erosion and dust, Use of durable materials aligned with EU standards for resilience. The ESA however lacks a dedicated climate risk assessment, e.g., hazard analysis and vulnerability assessment. We advise undertaking the climate change impact assessment at the time of the detailed design. The results of the study shall be used by the technical team to evaluate the proposed design and the required measures.	Apply EBRD climate risk screening tool or equivalent to undertake a climate change risk assessment – proportionate to this project risks.	15
4.8	Exposure to Disease	FC	ESA notes that the incoming non-local workforce could pose a risk of spreading communicable diseases to nearby settlements. This is considered a potential social and health impact during construction, particularly in rural communities with limited healthcare infrastructure. The ESA recommends preventive measures, such as: • Health screening of workers. • Provision of sanitary facilities and clean water in camps.	-	-

KPI Ref.	Environmental and Social Requirements	Score	Comments/ Issues	Actions Required	ESAP Ref.
			- Awareness campaigns for local communities. - Compliance with national health regulations and EBRD PR4 requirements. The proposed mitigation measures are considered sufficient.		
4.9	Emergency Preparedness and Response	PC	Emergency Response Plan included as part of the ESMP. The plan provides clear objective and scope, contains scenario-based planning, provides requirements for the Internal Emergency Response Team, communication protocols and requirements for the drills.	Post ESA, update the ERP to include the following: - Ensure the MSDS are used to determine the spill response plan considering the specifics and properties of the materials involved. - 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 - Define the type of drills that needs to be conducted per risk and the corresponding KPIs to recorded and monitored. Define the drills that need to be conducted together with the community, depending on the risk type and level, and especially where works will be conducted within the community. - Set out a structured community communication plan for emergency alerts (multi-channel warnings, languages), safe assembly areas, or post-incident updates especially when the works will be conducted in close vicinity to the residential houses.	16

KPI Ref.	Environmental and Social Requirements	Score	Comments/ Issues	Actions Required	ESAP Ref.
5	Land Acquisition, restrictions on land use and involuntary resettlement				
	Summary: Partial compliance. The project has applied measures to avoid displacement and land acquisition as much as possible, however, some economic displacement was unavoidable. A project-specific GRM must be implemented and communicated during stakeholder engagement. Once land impact for Lot 4 has been determined (Drochia bypass), consultations/socio-economic survey/census must occur, and RAP must be implemented in line with the LARF.				
5.1	Avoid or minimise displacement	PC	Economic displacement will be triggered for all four lots, see details in ESA, table 4-43. 1) Lots 1–3 (Rehabilitation sections), common situation across all three lots: Progress status: Cadastral works: Lot 1 → ongoing (2025 plan) Lots 2 & 3 → planned (2026, first semester) Valuation (compensation assessment), not yet completed (planned 2026) Expropriation offers, not started yet, planned only after valuation phase Expropriation process is legally enabled and initiated, but still in early/mid stages (cadastral + valuation) — no compensation or acquisition yet. Lot 4 (Drochia Ring Road – partly new construction) Status: There is no specific expropriation law or GD issued yet There is no cadastral or valuation tenders launched There is no expropriation proposals Expropriation process not started at all (very early stage).	Develop a Resettlement Action Plan in line with the project RARF.	17
5.2	Consultation	PC	Reportedly, engagement on the land aspects has been conducted primarily between authorities, this is at least confirmed for Lot 4. For other lots, no information is available.	LARF disclosure and consultation to be undertaken for relevant lots. Communicate Project -Specific GRM channel and procedure with community.	Covered in ESAP # 18-21
5.3	Compensation for displaced persons	NOP	There are several discrepancies between Moldavian National Law and EBRD ESR 5 regarding compensation for displaced persons including: 1. Full Replacement Costs: Moldovan Law does not require compensation at full replacement costs. 2. Preference for In-Kind Compensation: Moldovan law allows land-for-land compensation but does not prioritize it over cash. 3. Eligibility for Compensation: Moldovan law compensates only legal landowners and users, excluding informal occupants. 4. Economic Losses: Moldovan law does not cover compensation for loss of income or economic activities. 5. Transitional Allowances: Moldovan law has no provision for transition support during relocation. 6. Vulnerable Groups: Moldovan law does not provide additional assistance for vulnerable populations.	Implement LARF and develop subsequent documents (Resettlement Action Plan). Confirm a clear cut-off date for eligibility has been established.	Covered in ESAP # 18-21

KPI Ref.	Environmental and Social Requirements	Score	Comments/ Issues	Actions Required	ESAP Ref.
			Any economic or physical displacement that may occur during the project lifecycle should be compensated according to the LARF.		
5.4	Grievance mechanism	PC	During our site visit meeting with the NRA, the NRA indicated that an official Grievance Mechanism is in place. However, the mechanism described is a general procedure for handling complaints related to national roads, rather than project-specific grievances. To demonstrate its operation, the NRA shared a GRM register and examples of grievance letters. These letters primarily reflect issues raised by local authorities, such as requests for additional access roads and rehabilitation works associated with ongoing projects, along with NRA's responses. Reportedly there are no land-related grievances open or lodged. While a GRM register does exist, there is no official documented GRM procedure outlining how grievances are managed by the NRA (e.g. submissions channels, response timelines, and resolution steps). However, the Stakeholder Engagement Plan (SEP) that has been developed does outline a Project-Specific GRM procedure including the responsible parties. There is no record of a Project-Specific GRM being communicated with the affected communities.	1. Develop or implement project - specific GRM as outlined in the SEP or aligned with ESR 10 and communicate to local authorities and make accessible to the community. 2. Develop a centralized Project-Specific GRM Register where all project specific complaints are recorded by grievance focal point which should be fully operational prior to the socio-economic census/survey.	Covered in ESAP # 18-21
5.5	RAP/LRP documentation	PC	A Land Acquisition Resettlement Framework has been developed. A Resettlement Action Plan needs to be developed and activity rolled out.	Develop Resettlement Action Plan and conduct socio-economic census/survey. Considering the social profile of the community we recommend a separate vulnerability assessment to be undertaken as a part of the RAP.	Covered in ESAP # 18-21
5.6	RAP/LRP implementation	NOP	Pending development of the RAP.	-	
5.7	Monitoring	NOP	Pending development of the RAP.	Develop internal monitoring and independent external reviews are scheduled to track the long-term success of the RAP/LRP.	Covered in ESAP # 18-21
5.8	Funding/Budgeting	NOP	Pending development of the RAP.	Confirm if the budget includes topping up mechanism for full replacement costs and that funds are delivered and secured prior to land entry.	Covered in ESAP # 18-21

KPI Ref.	Environmental and Social Requirements	Score	Comments/ Issues	Actions Required	ESAP Ref.
6	Biodiversity Conservation and Sustainable Management of Living Natural Resources				
	Summary: The project is in compliance. The assessment shows that the project area passes through agricultural and semi-rural landscapes but comes into proximity with Emerald Sites.				
6.1	Assessment of Biodiversity and Living Natural Resources		The biodiversity baseline along the R7 corridor reflects a predominantly modified landscape, characterised by agricultural land, roadside vegetation, shelter belts, and fragmented semi-natural habitats. Natural habitats are limited in extent and are largely confined to river valleys, riparian zones, and patches of woodland. The project area does not pass directly through designated critical habitats, but several sections are located in proximity to nationally protected areas and Emerald Network sites, increasing sensitivity in specific locations. Common flora and fauna typical of farmland and rural landscapes dominate the baseline, while the presence of protected or rare species is considered possible mainly in riparian habitats and wooded areas. Baseline information is derived primarily from desk-based review of existing data sources and field reconnaissance, rather than detailed season-specific ecological surveys. Overall, baseline biodiversity value is assessed as low to moderate, with higher local importance near watercourses and forested areas. During the construction phase, the principal biodiversity impacts identified include vegetation clearance (including tree felling), temporary habitat disturbance, soil stripping, and disturbance to fauna through noise, vibration, and increased human activity. Tree removal is required in some sections, particularly where road widening or new alignments are proposed. Construction works near rivers may affect aquatic habitats through sediment runoff if not properly controlled. These impacts are assessed as localised, temporary, and reversible, provided mitigation measures are implemented. In the operational phase, biodiversity impacts are expected to be limited. Improved road design and drainage reduce erosion risks, while traffic redistribution through bypasses is not expected to significantly increase habitat fragmentation. Some collision risk for fauna remains, but this is considered low given the existing road context. Mitigation measures include avoidance of sensitive areas where feasible, minimisation of vegetation clearance, seasonal restrictions on works to avoid breeding and nesting periods, compensatory planting for tree loss, controlled works near watercourses, and implementation of erosion and sediment control measures. Where required, pre-construction ecological checks and supervision by qualified specialists are foreseen. With these measures in place, residual impacts on biodiversity are assessed as low, and the project is not expected to result in significant adverse effects on protected species or designated sites.	Undertake pre-construction ecological survey by qualified specialists for Lot 3 (due to road intersection with Emerald Site Middle Prut within the forest area near Saptebani village). . If monitoring identifies possible effects 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 project must be put in hold until after the hutching or the disturbing activities should be done after or before the sensitive period. The proposed biodiversity measures in the ESA shall be further elaborated and made obligatory, 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 an ecologist based on the monitoring 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 IFC PS6). Biodiversity monitoring shall be continued based on the findings of the pre-construction survey, during the construction period.	22
6.2	Conservation of Biodiversity		-	-	-

KPI Ref.	Environmental and Social Requirements	Score	Comments/ Issues	Actions Required	ESAP Ref.
6.3	Sustainable Management of Living Natural Resources		-	-	-
7	Indigenous Peoples				
	Summary: Moldova does not have any officially recognized indigenous peoples. As such, ESRs 7 is not applicable to this project.				
7.1	Indigenous People Assessment	NA	There is no indication that there are indigenous peoples in the areas of the project, as defined by ESR 7. As such ESR 7 is not applicable for this project.	-	-
8	Cultural Heritage				
	Summary: The project is in compliance. No adverse impacts on cultural heritage are foreseen for this project. In case, cultural heritage sites are discovered during construction, the Chance Finds Procedure as part of the ESMS and CESMP shall be implemented.				
8.1	Assessment and Management of Impacts on Cultural Heritage	FC	The R7 project corridor is largely located within already modified landscapes, mainly existing road corridors and agricultural land. No known registered cultural, historical, or archaeological sites are located directly within the proposed construction footprint. Where cultural or heritage sites are present in the wider region, they are generally outside the right-of-way and not expected to be affected by planned works.	Develop and implement the Chance Find Procedure .	23
9	Financial Intermediaries				
	Summary: Financial Intermediaries are not applicable to this project. EBRD is the lender of this project.				
9.1	Financial Intermediaries	NA	EBRD is the lender for this project. Financial intermediaries are not applicable to this project.	-	-
10	Stakeholder Engagement				
	Summary: The project is in compliance. SEP has been developed for the project in line with EBRD ESR 10. Continued engagements throughout project lifecycle is required, along with regular updates of the SEP recording all engagements and grievances. A project-specific Grievance Redress Mechanism, as outlined in the SEP or aligned with EBRD PR10, must be implemented and clearly communicated by the National Road Administration to all stakeholders.				
10.1	Stakeholder Engagement Plan	PC	Stakeholder engagement for the R7 project has been carried out in line with EBRD Performance Requirement 10 (PR10) and national requirements, with the objective of ensuring early information disclosure, meaningful consultation, and ongoing communication with affected and interested parties throughout the project lifecycle. Engagement to date has focused on information sharing and consultation at an early planning stage and has included:	Continue update of SEP recording all engagement and grievances during the project lifecycle.	24

KPI Ref.	Environmental and Social Requirements	Score	Comments/ Issues	Actions Required	ESAP Ref.
			• Public consultations and meetings in project-affected areas to present the project scope, planned road works, and expected benefits • Meetings with local authorities to discuss alignment options, land requirements, traffic arrangements, and local concerns • Disclosure of project information, including the draft ESA and Non-Technical Summary, through publicly accessible channels • Collection of stakeholder feedback on key issues such as land take, access to properties, road safety, construction disturbance, and traffic management The consultations indicated general support for the project, particularly due to anticipated improvements in road safety, travel times, and regional connectivity, alongside concerns related to land acquisition, temporary disruption during construction, and maintenance of access. A project-level grievance redress mechanism has been established to allow stakeholders to raise concerns or complaints. The GRM is accessible, free of charge, and applies throughout project implementation, including construction and operation phases. Details of the stakeholder consultations: Early stakeholder engagement was carried out between September and October 2025, involving key institutional stakeholders, including the National Road Administration (NRA), the District Councils of Soroca, Drochia, and Rîșcani, as well as the mayors of affected localities and representatives of road departments. These consultations are documented in the Stakeholder Engagement Plan (SEP) and the Environmental and Social Assessment (ESA), Chapter 5, and also included engagement with the National Agency for Transport. During these initial meetings, stakeholders were provided with comprehensive information about the project, including its scope, anticipated impacts, and implementation approach. Feedback was actively collected on key topics such as: • Land acquisition requirements • Potential environmental and biodiversity impacts • Cumulative impacts • General concerns and expectations related to project development Further scoping engagement activities also involved representatives from the Local Infrastructure and Environmental Stakeholders Association (LIESA), including a meeting held on 20 October 2025 with the Drochia District Council and representatives from six localities.		

KPI Ref.	Environmental and Social Requirements	Score	Comments/ Issues	Actions Required	ESAP Ref.
			Subsequently, between 19 March and 1 April 2026, a second phase of stakeholder engagement was conducted, focused on baseline data collection and ESA consultations. This phase included: • A questionnaire survey covering key socio-economic and environmental aspects such as: ○ Livelihoods and income ○ Gender considerations ○ Land ownership and land tenure ○ Road safety issues ○ Environmental concerns • A total of 220 respondents participated in the survey. The results of the survey highlighted that road safety is the primary concern among affected communities, with specific issues including: • Insufficient road lighting • Poor road conditions • Lack of safe pedestrian crossings • Unsafe access to the road for vehicles and pedestrians • Inadequate road markings • Risks associated with mixed traffic (vehicles, pedestrians, and slow-moving users) In addition to the survey, 16 community meetings were held, with a total of 280 participants, supported by documented attendance lists. During these meetings, discussions focused on: • Project scope and construction works • Land acquisition processes • Proposed road safety improvements • Collection of feedback from local communities Participants emphasized the urgent need for road rehabilitation, particularly due to damage caused during winter conditions. Key recommendations from stakeholders included: • Dedicated lanes for slower-moving traffic • Sidewalks and safety barriers • Improved drainage systems • Properly designed bus stops • Ensuring safe access to residential and commercial properties • Installation of traffic monitoring systems (e.g. speed control cameras) All stakeholder concerns and feedback have been fully captured and integrated into the ESA. Based on the scope, depth, and coverage of the engagement activities, it is concluded that the stakeholder consultation process has been adequate and is now complete.		

KPI Ref.	Environmental and Social Requirements	Score	Comments/ Issues	Actions Required	ESAP Ref.
10.2	Operational Grievance Mechanism		The SEP has developed a project-specific Grievance Redress Mechanism in line with ESR 10 and national requirements including the procedure and responsible entities. SEP indicated that during the feasibility and environmental permitting engagements, no grievance mechanism was available. Having reviewed the Stakeholder Scoping Engagement records, it remains unclear whether the newly developed GRM has been communicated to the stakeholders.	Implement and communicate a project specific GRM as described in SEP or develop and communicate GRM in line with EBRD ESR 10.	25
Overall Compliance					
	National Environmental, Social, Health and Safety Requirements	Pending final IA	The project is designed and has the intention to meet national requirements. With the proposed mitigation measures, the impacts will be reduced to acceptable levels.	-	-
	EU Environmental, Social, Health and Safety Requirements	PC	At this stage of project development certain project elements are not in line with the EBRD requirements. These items are captured in the Environmental and Social Action Plan. Provided these items are addressed, project will reach FC level.	As listed in the ESAP	-

