First Look Solutions	
XXX-X-XXXX-XX-XXXX-000-00	

Title:

Environmental and Social Management Plan for Vifor Wind Farm Project

Topic:

Defines arrangements in place for the management of environmental and social aspects during Vifor Wind Farm Project Execution

Target Group:

Employer/First Look Solutions, EPC, Owner's Engineer

	Name	Position	Signature	Date
Created by:			---	---
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Revision Details					
Rev. No.	**Revision Status**	**Revised chapter/ page**	**Revision's reason**	**Revision's promoter**	**Revision's date**

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ATTACHMENTS

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ABBREVIATIONS

CMP	*Contractor Management Plan (generic term for management plans, method statements, work procedures implemented by contractors)*
EP4	*Equator Principles (4th edition)*
EPC	*Engineering, Procurement, and Construction*
E&S	*Environmental and Social*
ESHS	*Environmental, Social, Health and Safety*
ESIA	*Environmental and Social Impact Assessment*
ESMP	*Environmental and Social Management Plan*
IFC	*International Finance Corporation*
OHL	*Overhead Transmission Line*
PS	*Performance Standard*
WTG	*Wind Turbine Generator*

1.0 INTRODUCTION

1.1 PURPOSE

First Look Solutions S.A. (the Project Owner or the Company) is a Romanian-based company established to build, own, and operate the Vifor Wind Farm Project (the Project).

A comprehensive Environmental and Social Impact Assessment (ESIA) Package has been prepared for the Project. A key part of the Package is the Project Environmental and Social Management Plan (ESMP) as described in this document.

The purpose of this ESMP is to:

- Provide an overview of the environmental and social policies, regulations and standards applicable to the Project to all project staff including contractors;
- Document and direct Project Owner's personnel and guide Engineering, Procurement and Construction, (EPC) Contractor on how Project Environmental and Social (ESHS) risks are managed during the construction stage of the Project to conform with applicable policies, regulations and standards and ensure the Project commitments are attained. This includes (i) establishing measures to be applied (ii) communicate requirements to project staff including contractors, and (iii) oversight of requirements implementation, as detailed further in this ESMP;
- Clarify ESHS compliance assurance roles and responsibilities during the construction stage of the Project;
- Ensure that adequate processes are in place to appropriately monitor construction activities against Project ESHS policies, regulations and standards;
- Ensure reporting systems are developed and implemented to communicate ESHS compliance performance to Project Owner's leadership and further to all project staff including contractors;
- Facilitate continual improvement and ESHS compliance assurance.

This ESMP details the ESHS management processes associated with the construction and commissioning stages of the Project. This ESMP and associated management plans will be revised as needed to accommodate any new mitigation required and to reflect lessons-learned from the ESHS monitoring.

The ESMP will be subsequently updated and revised as appropriate for the operational stage of the Project to reflect the different ESHS risks at that stage and any lessons-learned to date – referred to as the Operation-ESMP. The Operation-ESMP, along with supporting operational management plans, will be drafted during the end of the construction stage and disclosed not later than 2 months before start of Vifor Wind Farm Project commercial operations.

This ESMP provides an overview of the processes to identify, avoid, mitigate and manage Project ESHS risks during the construction stage. The ESMP is the central document of the Project ESHS management system and is supported by a series of subordinated ESHS management plans and procedures implemented at Company and Contractor levels:

- Project Owner Level ESHS Management Plans – see Figure 3 in section 2 for an overview of the various management plans. These plans lay out the processes implemented by First Look Solutions to ensure Project policies, standards and commitments are attained during the construction stage of the Project and guide EPC Contractor on the requirements and management plans to be implemented for the Project as part of their ESHS management system.
- Contractor Level ESHS Management Plans referred to in this ESMP as Contractor Management Plans (CMP) – see section 2.5 for an overview of the ESHS management plans to be put in place by the EPC Contractor to ensure implementation of the Project policies, standards and commitments during own Project construction activities.

Box 1.1 Project ESHS risks management approach

The management of the Project's ESHS risks will follow a "cascade" approach, reflecting good international practice:

- The guiding plans and policies are outlined in this ESMP and related Project Owner – Level Management Plans;
- EPC must - on this basis - develop their own EPC-HSE Plan (to be approved by First Look Solutions) and Contractor Level Management Plans and method statements;
- EPC must implement and enforce the EPC-HSE Plan measures in their own activities and those of any of their subcontractors and other service providers;
- EPC undertakes periodic monitoring of EPC-HSE Plan implementation (and reports to the Project Owner);
- Project Owner conducts its own overall monitoring of the EPC performance (and reports to Lenders);
- Lenders and external advisors conduct independent Project ESHS audits.

Updates/revisions to the ESMP and the EPC-HSE Plan will be implemented as appropriate to reflect the ongoing findings of the monitoring and audits performed, as well as corresponding training of staff. This approach provides for a robust system with continual improvement of Project ESHS risk management.

1.2 THE VIFOR WIND FARM PROJECT

The Project is located in Buzau County, south-east of Buzau City, on the administrative areas of Costeşti, Gherăseni, Smeeni, Luciu and Țintești communes, being located mainly in Călmăţui River meadows. The site is in an area of dry and salt steppes and pastures, partially overlapping the Natura 2000 sites ROSCI0259 Valea Călmăţuiului and ROSPA0145 Valea Călmăţuiului.

The Project extends on a total area of approximately 2,869 ha, has a total capacity of 460.8 MW and comprises 72 EnVentus Vestas V162 type wind turbine generators (WTGs) of 6.4 MW each.

The WTGs are connected via underground cable lines to a single transformer station, and from there through a short overhead transmission line (OHL) to the national grid. The wind farm will use a network of existing agricultural roads and newly built access roads, along which will be installed the underground cable lines, and which will include as the main road artery an East-West construction corridor.

A Project location map is provided in Figure 1 overleaf.

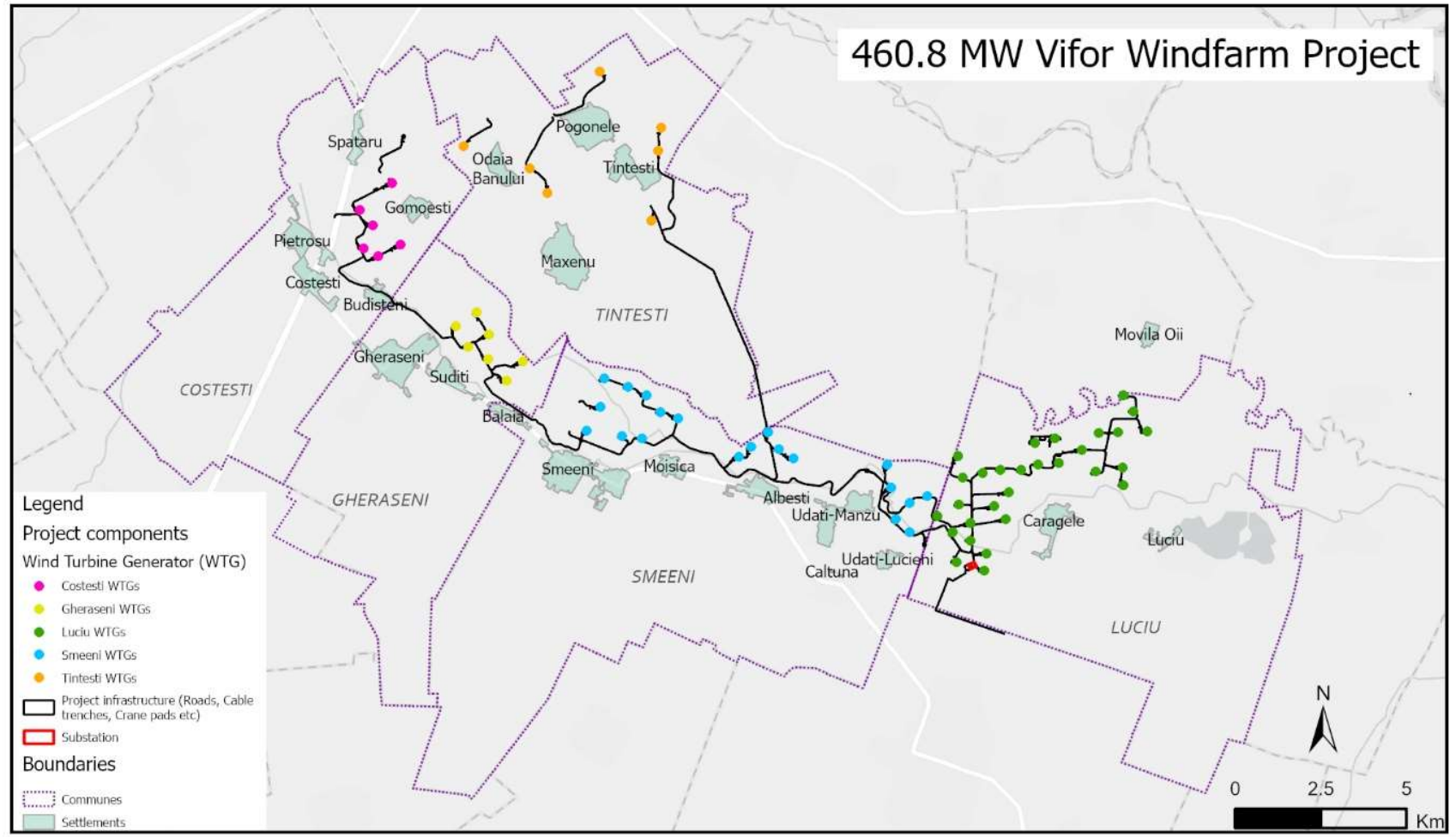


Figure 2 Vifor Wind Farm Project Location Map

2.0 VIFOR WIND FARM PROJECT ESHS MANAGEMENT SYSTEM

2.1 PROJECT OWNER'S MANAGEMENT SYSTEM CONCEPT

The Project ESHS Management System is based on a four-step iterative process aligned with the Plan-Do-Check-Act model as represented in Figure 2 overleaf. The concept reflects an adaptive management loop allowing for accommodation of changes that occur as the Project moves through the various implementation stages.

All of the main activities corresponding to the above four components of the Project ESHS management system are described in the following sections of this ESMP (to facilitate reader orientation, the respective stage of **[PLAN], [DO], [CHECK], [ACT]** is indicated at the subsection headings).

The Plan-Do-Check-Act model was transposed in the Project's ESHS Management System following a staged approach, organized in three levels (from A to C) as represented in Figure 3.

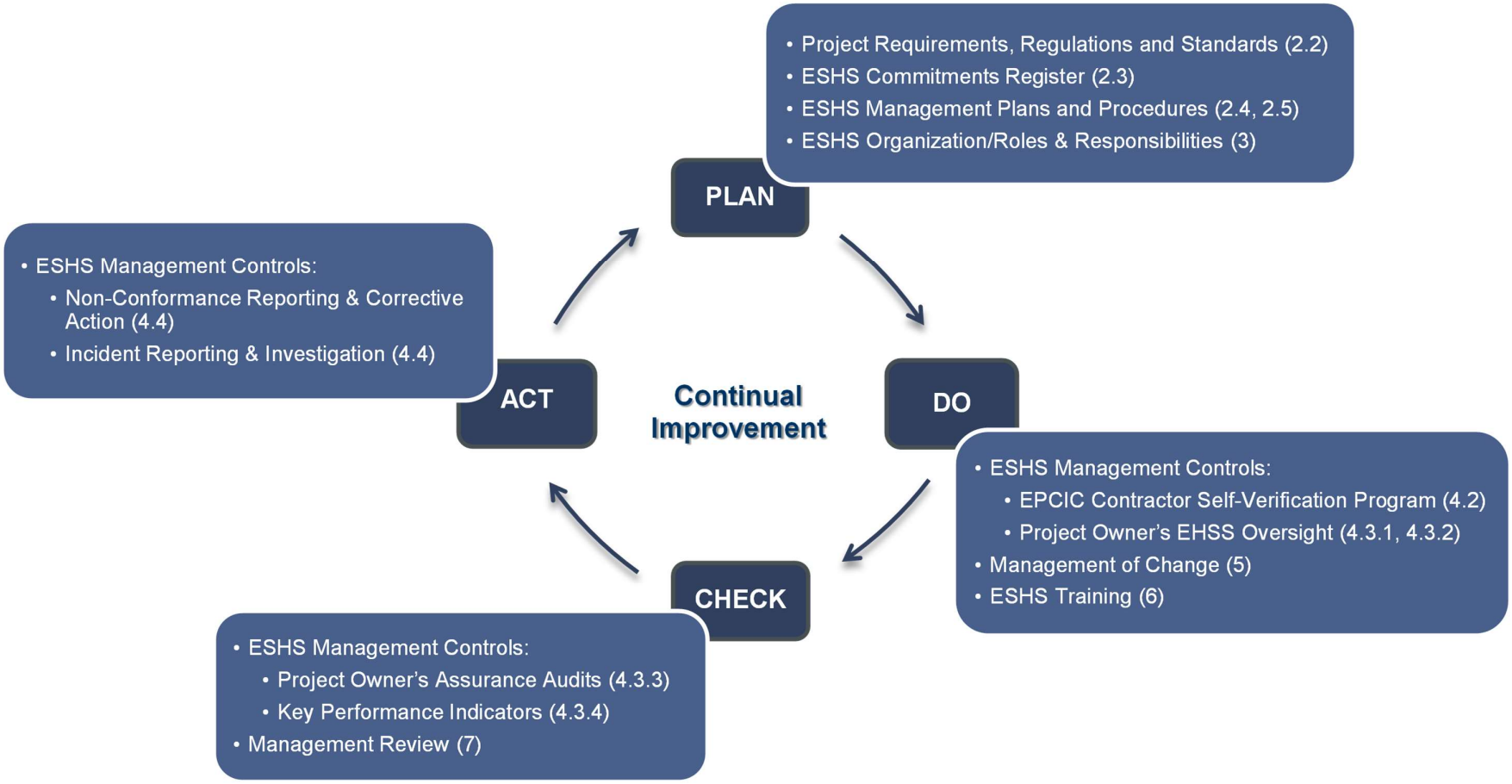
This process is initiated with the identification of the applicable requirements, regulations and standards and the definition of the principles and leadership commitments stated in the First Look Solutions Code of Conduct & Business Ethics and ESHS Policies. Subsequently, the Project's ESHS risks and impacts were identified and assessed based on the ESIA package of studies performed for the Vifor Wind Farm Project. The ESIA identified the embedded ESHS controls[1] and defined the mitigation measures required to address the residual ESHS impacts and ensure that the Project requirements, regulations and standards are met. Addressing the ESHS risks and impacts represents a Project commitment, more specifically a commitment by the Project Owner to ensure that these measures will be implemented during the Project execution – either by the Project Owner themselves or via the EPC or other parties.

The ESHS mitigation measures defined as resulted from the ESIA process were transposed into a Commitments Register serving as a tool which informs this ESMP as well as the subordinated ESHS management planning and processes to be implemented at the various levels of the Project organization.

This ESMP is a key component of the Project ESHS risk management system, providing an overview of the processes and tools to manage Project ESHS risks within the frame of the Plan-Do-Check-Act model. The ESMP also sets the requirements for the management planning (operational controls, performance review and evaluation) to be established and maintained by the Project Owner and the EPC Contractors.

The above-indicated management system concept and the relationship between the ESMP, the Project requirements, regulations and standards (see section 2.2) and the management plans at the various levels of the Project ESHS Management System, is represented in Figure 3 overleaf. Each Project ESHS management system component indicated above and represented in Figure 3 is detailed in the following sections of this ESMP.

[1] *The term "Embedded Controls" refers to those protective measures that are anyhow already included in the approved Project Design, such as high-efficiency boilers, air filters, wastewater treatment, etc. – therefore such items do not normally need to also be added as a further commitment.*



(Numbers in brackets indicate the ESMP chapters detailing the respective topics)

Figure 2 Vifor Wind Farm Project ESHS Management System Process

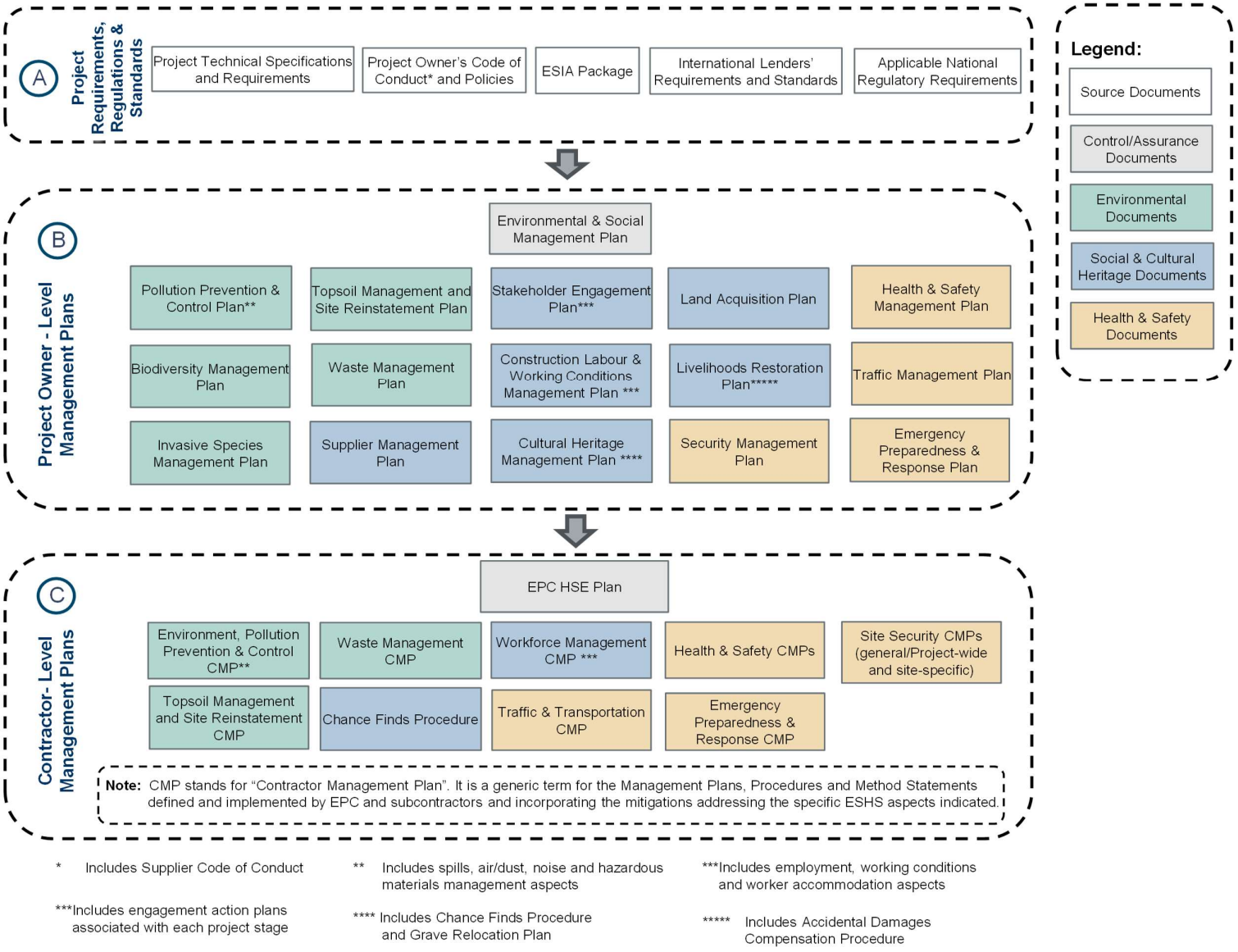


Figure 3 Vifor Wind Farm Project ESHS Management Planning Structure

2.2 PROJECT REQUIREMENTS, REGULATIONS AND STANDARDS [PLAN]

First Look Solutions and its EPC Contractors are required to meet a number of key ESHS requirements, regulations and standards as outlined below. This ESMP is intended to support transposition of these standards into Project implementation.

These Project requirements regulations and standards represent the basis of the Project ESHS management system and are represented in Figure 3 – Level A.

The Project requirements regulations and standards are explained below.

2.2.1 PROJECT OWNER'S CODE OF CONDUCT AND POLICIES

First Look Solutions has developed a set of overarching ESHS company policies, as listed below, and has committed to implement these on the Project to guide and ensure conformance to the Project Requirements, Regulations and Standards. These are applicable to all activities, including the construction works program and all staff working for the Project:

- Code of Conduct[2] and Business Ethics;
- Anti-Bribery and Anti-Corruption Policy;
- Corporate Social Responsibility Policy;
- Employment Policy;
- Whistle Blower Policy;
- Environmental Policy;
- Health and Safety Policy;

These policies establish the framework for the Project's environmental, social, health and safety management processes as further developed and defined within this ESMP.

2.2.2 NATIONAL LEGISLATION AND PERMITTING

Key environmental legislation documents applicable to Vifor Wind Farm Project are summarised in Appendix A.

The Project Owner and its EPC Contractor will comply with the requirements of all national laws, regulations and codes of practice, and fulfil all applicable regulatory requirements.

To ensure this, the Project Owner will maintain throughout the project life cycle both legal requirements and permitting registers to consolidate all applicable environmental and social compliance obligations for the Vifor Wind Farm Project.

The EPC Contractor will set up a process for tracking and implementing any regulatory changes and requirements updates relevant for their activity.

The permit register constitutes an integral part of the EPC Contract. The up-to date version of the register (updated as changes occur) is available at all times for both the Project Owner and the EPC Contractor though the document sharing and communication platform established for the Project.

[2] Including Supplier Code of Conduct

2.2.3 EU AND INTERNATIONAL LEGISLATION

International conventions and protocols

International conventions ratified by Romania and relevant to the Vifor Wind Farm Project include:

- United Nations Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters 1998, ratified by Law no. 86/2000 (Aarhus Convention);
- The Kyoto Protocol on Climate Change (UNFCC)
- The United Nations Convention on Biodiversity 1992 ratified by Law no. 58/1994
- Convention on the Conservation of European Wildlife and Natural Habitats, 1979, ratified by Law no. 13/1993 (Bern Convention);
- Convention on Conservation of Migratory Species of Wild Animals, 1979, ratified by Law no. 13/1998 (Bonn Convention);
- International Union for Conservation of Natural Resources Red List of Threatened Species
- European Convention on the Protection of the Archaeological Heritage, 1992, ratified by Law no. 150/1997 (La Valetta Convention);
- European Landscape Convention, 2000, ratified by Law no. 451/2002 (Florence Convention);
- The Basel Convention 1989
- The International Labour Organisation's Core Conventions;

Additional details on the above-indicated international conventions and protocols are provided in Appendix A.

International Environmental and Social Policies and Standards

The international environmental and social policies and the key good international industry practice standards applicable to the Project are:

- EBRD Environmental and Social Policy (May 2014) and associated Performance Requirements;
- Equator Principles IV (2020);
- International Financing Corporation (IFC), Performance Standards (PS) (2012);
- IFC Environmental, Health and Safety Guidelines for Wind Energy (2015);
- IFC Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution (2007);
- World Bank Group, General Environmental, Health, and Safety Guidelines (2007); and
- World Bank Group, Environmental, Health and Safety Guidelines for Wind Energy (2015).
- IFC/EBRD Guidance Note: Worker's Accommodation: Processes and Standards (2009);
- Voluntary Principles on Security and Human Rights.

2.3 ESHS COMMITMENTS REGISTER

Upon completion of the ESIA process, the mitigation measures addressing the potential Project's impacts as defined in the ESIA package were transferred into an ESHS Commitments Register (the Commitments Register).

The Commitments Register consolidates the applicable ESHS mitigation measures defined in the ESIA package as actionable measures, management and monitoring activities for implementation during Project execution stages.

The Commitments Register was developed in an easily understandable format allowing to be used as a tool by the Project ESHS staff during Project execution. For ease of use and implementation, the Commitments Register is organized to provide for each commitment indication on:

- the Project stage (i.e. construction and operation) the respective commitment is applicable to,
- responsibility for implementation (i.e. Project Owner and/or EPC),
- Project location/site the respective commitment is applicable to, and
- the Project Owner's and EPC management plan ensuring implementation of the commitment.

In turn, the Commitments Register informs the Project Owner and the EPC Contractors' Management Plans which detail the resources and processes to be put in place to ensure the commitments implementation.

A printout of the Commitments Register represents an integral part of this ESMP and is provided in Annex 2 of this document. The Commitments Register includes, in the case of each item, indication of the management plan(s) ensuring the implementation of the respective commitment.

2.4 PROJECT OWNER–LEVEL ESHS MANAGEMENT PLANS [PLAN]

The Project Owner has overall responsibility for the implementation of the Project ESHS mitigation measures. To ensure this, a number of ESHS Management Plans will facilitate the implementation of Project commitments, requirements, regulations and standards.

These ESHS Management System components are represented in Figure 3 – Level B, referred to as Project-Owner-Level Management Plans.

The Project Owner-level Construction Phase Management Plans (also referred to herein as the Project ESHS Management Plans) are the following:

- Pollution Prevention and Control Plan (covering air emissions, noise, water supply and wastewater, spill prevention/contaminated land and hazardous materials management)
- Biodiversity Management Plan
- Invasive Species Management Plan
- Topsoil Management and Site Reinstatement Management Plan
- Waste Management Plan
- Stakeholder Engagement Plan (including engagement action plans for each project stage)
- Supplier Management Plan
- Construction Labour and Working Conditions Management Plan (covering employment, working conditions and worker accommodation aspects)
- Cultural Heritage Management Plan (includes Chance Finds Procedure and Grave Relocation Plan)
- Land Acquisition Plan
- Livelihoods Restoration Plan (includes Accidental Damages Compensation Procedure)

- Community Investment Plan
- Security Management Plan
- Health and Safety Management Plan
- Traffic Management Plan
- Emergency Preparedness and Response Plan

The Project ESHS Management Plans detail the management and implementation processes required to achieve commitments, requirements, regulations and standards. The main roles of the Project ESHS Management Plans are to:

- Define the processes in place to ensure that the Project Owner as an organization is implementing the Project commitments, requirements, regulations and standards under their direct responsibility.
- Define the compliance and assurance processes ensuring that the work planned and performed is conducted according to the Project ESHS commitments, requirements, regulations and standards.
- Ensure that the Project Owner implements ESHS oversight of the EPC Contractors to measure the effectiveness of their self-verification processes with ESHS commitments, requirements, regulations and standards;
- Define and communicate to the EPC Contractors the requirements regarding the specific management procedures they will have to implement during Project execution.

The Project Management Plans will be structured to include but will not be limited to the topics in the following table.

Table 2-1 Project Owner-level Construction ESHS Management Plans

No.	Project ESHS Management Plan	Aspects covered

1	**Pollution Prevention and Control Plan**	• General pollution prevention and protection measures
		• Pollution prevention and protection measures at hazardous materials storages, such as bunding of storage areas, tank overfilling prevention measures etc.
		• Spill prevention containment measures around sensitive equipment, installation of appropriate spill clean-up equipment and development of response procedures
		• Measures at source to prevent pollutants to enter pathway
		• Actions to be followed in case pollutants enter the pathway
		• Management of spill-contaminated soil
		• Wastewater discharge and management
		• Construction dust mitigation and monitoring
		• Noise management,
		  ○ Noise abatement/mitigation measures
		  ○ Noise monitoring
		• Hazardous materials storage and handling

2	**Biodiversity Management Plan**	• Plan for implementation of mitigation measures identified in the assessment of Project's impact on biodiversity. • Mitigation strategy (how the mitigation hierarchy has been followed) • Requirements for pre-construction check surveys • Management and monitoring measures during construction phase of the project • Roles and responsibilities
3	**Invasive Species Management Plan**	• Measures to avoid the introduction and / or spreading of invasive alien species

No.	Project ESHS Management Plan	Aspects covered
4	**Waste Management Plan**	• Non-hazardous and hazardous waste management, including: o Waste hierarchy implementation (i.e. reduction at source, reuse, recycling, energy recovery, responsible disposal); o Identification and classification of wastes; o Waste register; o Waste handling (i.e. collection, segregation and containers, storage, treatment, transport and documentation, disposal); o Waste duty of care process (waste transfer, waste consignment provisions); o Monitoring and reporting.
5	**Stakeholder Engagement Plan**	• Stakeholder identification and mapping • Stakeholder analysis • Previous engagement activities • Stakeholder engagement plan and record keeping • Grievance mechanism • Monitoring and evaluation • Internal and external reporting • Roles and responsibilities • Engagement Action Plans for each project stage
6	**Supplier Management Plan**	• Commitments on responsible sourcing and on forced labour in supply chain. • Mapping and risk assessment of suppliers sourcing equipment and components from forced labour risk jurisdictions. • Measures responding to potential exposure to forced labour (informed by mapping outcomes). • Self-declarations and codes of conduct requirements to contractors and suppliers regarding labour risks. • Inclusion of appropriate clauses in procurement notices and contracts with contractors and suppliers on labour risks and their management. • Option for labour audits of suppliers. • Requirements for traceability protocols from equipment suppliers down to key raw materials producers. • Requirements for suppliers of equipment and components from forced labour risk jurisdictions to conduct traceability audits of their supply chains. • Requirements for chain-of-custody certification from suppliers.
7	**Construction Labour and Working Conditions Management Plan**	• Training and skill development activities; • Employee grievance mechanism; • Camp and worker accommodation management aspects • Measures for fair treatment, non-discrimination, and equal opportunity in employment. • Requirements related to provision of safe and healthy working conditions, and the health of workers • Management of potential communicable diseases associated with construction workforce. • Behavioural code of conduct for workers when outside of work and for interaction with local community • Contractor employment practices conformance, reporting and monitoring • Management measures related to child labour, forced labour, third-party workers.
8	**Cultural Heritage Management Plan**	• Cultural heritage responsibilities, management and works supervision during construction • Chance finds procedure • Chance finds training, management and response • Interface and coordination with relevant authorities

No.	Project ESHS Management Plan	Aspects covered
		• Grave Relocation Plan
9	**Land Acquisition Plan**	• Scope of land and land rights acquisition • Socio-economic survey • Information disclosure and consultation • Entitlements and benefits • Grievance mechanism • Monitoring and reporting
10	**Livelihoods Restoration Plan**	• Livelihoods restoration principles and activities • Eligibility and entitlements • Planning and implementation • Monitoring and evaluation • Accidental damages compensation process

11	**Security Management Plan**	• Security arrangements roles and responsibilities
		• Site access (project personnel identification, visitors identification vehicles identification etc.)
		• Security-related communication arrangements
		• Interface with host government agencies and public security forces
		• Provisions to ensure compliance with regulations and good industry practice regarding:
		  ○ Security personnel selection and employment
		  ○ Security personnel rules of conduct,
		  ○ Security personnel training, equipment
		  ○ Monitoring of compliance and investigation process of non-compliance acts
		• Security training program including:
		  ○ Code of Conduct modules specific to security personnel
		  ○ Voluntary Principles on Security and Human Rights
		• Grievance mechanism

12	**Health and Safety Management Plan**	• Safety principles and philosophy • H&S policies and commitments • Project H&S objectives • H&S management system structure • H&S leadership, organization, competence, communication • Contractors H&S management • PPE requirements and enforcement • Non-conformances and incident reporting, investigation and lessons learned • H&S audit & review • H&S performance monitoring/ improvement • H&S records and documents control
13	**Emergency Preparedness and Response Plan**	Provision of a consistent and systematic approach to ensure effective control and management of emergencies that may be encountered during project development on project sites. • roles and responsibilities, chain-of-command and communication framework • decisional workflow in case of emergency • different emergency tiers response teams: • notification procedure • potential emergency scenarios and their management • media and public relations during emergency • training and drills requirements • emergency contact details
14	**Traffic Management Plan**	General management plan defining common control measures, standards and procedures for construction traffic management aimed at guiding contractors on

No.	Project ESHS Management Plan	Aspects covered
		applicable construction traffic planning and management requirements. • Site access and haulage routes (for general and over-dimensioned vehicles) • Road traffic management including on-site and off-site/public roads speed limits, vehicle inspection requirements, operating rules and procedures • Dust, air emissions, noise abatement requirements and measures • Access roads management • Road-related accidents prevention • Local traffic signage • Timing of deliveries • Roads closure • Roads cleaning • Abnormal load road safety and management requirements • Communication in advance of heavy and abnormal load construction traffic through communities • Training of drivers and equipment operators • Community awareness program on traffic-related risks, in line with SEP provisions • Monitoring system • Internal monitoring and reporting • Contractor traffic and transportation management planning requirements.

2.5 CONTRACTOR-LEVEL ESHS MANAGEMENT PLANS [PLAN]

EPC Contractors are responsible for the implementation of the ESHS mitigation associated with the execution of the Project construction activities.

To ensure this, the EPC Contractors are required to define and implement their own ESHS compliance monitoring and assurance processes for the Project. These will be outlined in EPC Environmental and Social Management Plan (EPC-HSE PLAN) and topic-specific Contractor Management Plans (CMP).

CMP, in the sense used throughout this ESMP is the generic term for the Management Plans, Procedures and Method Statements defined and implemented by contractors and incorporating the mitigations addressing the specific ESHS impacts associated with their operations, as guided by this ESMP and the Project Owner-level ESHS Management Plans.

These ESHS Management System components are represented in Figure 3 – Level C and referred to as Contractor Management Plans (CMP).

Each EPC Contractor is required to ensure that all requirements set in the Project-level ESHS Management Plans and which are relevant to the EPC and their subcontractors activities are transposed and detailed in the EPC-HSE PLAN and the CMPs.

The CMPs will be compliant with the ESIA package documents, the Commitments Register, the Project Requirements Regulations and Standards referred to in section 2.2 of this ESMP including national and EU regulations, EBRD PRs and IFC PSs.

The Project Owner will review and approve the EPC-HSE PLAN and the CMPs in line with the Project documents approval process.

No construction work is allowed to be performed by the EPC or its subcontractors until the EPC-HSE Plan and CMPs are pre-approved by the Project Owner, in line with the Project's formal documents approval process.

2.5.1 EPC CONTRACTOR HSE PLAN (EPC-HSE PLAN)

The EPC-HSE Plan is the operational control document defining EPC Contractor's self-verification and assurance processes to ensure the Project ESHS commitments are implemented at site level.

The EPC-HSE Plan will detail the roles and responsibilities, the self-verification and assurance processes put in place at the EPC organization level to ensure the requirements of this Project ESMP and the ESHS Commitments are met. This will include all aspects related to staffing, roles and responsibilities, resources, self-verification and assurance processes, communication, and management of non-conformances.

The EPC-HSE Plan will be structured to provide the information in the following table.

Table 2-2 EPC-HSE Plan content

EPIC-HSE Plan Suggested Sections	**EPC-HSE Plan Required Content**
Introduction	• Purpose & objective • Reference to EPC ESHS Policies and Procedures • Applicable ESHS Requirements, Regulations and Standards
Project ESHS Management	• EPC Project ESHS management concept • EPC ESHS Project management documents (EPC-HSE Plan, CMPs, Subcontractor Method Statements, ESHS requirements etc.)
Project Organization	• Overall EPC ESHS Project Organization • EPC ESHS Staffing, Roles and Responsibilities
ESHS Management Controls	• EPC ESHS Self-verification (daily/weekly etc. oversight inspections of own and subcontractor activities, joint inspections with Project Owner, monitoring etc.) • EPC ESHS Assurance (internal and external audits, management review etc.) • Action Tracking System (system for recording and monitoring of ESHS corrective actions/measures until closure) • Non-conformity Notification, Recording and Corrective Action (ESHS NCR system) • ESHS Incident Reporting and Investigation • ESHS Monitoring Program • ESHS Reporting (daily, weekly, monthly reporting, KPI reporting etc.) • ESHS Documentation Management (ESHS records management)
Subcontractors Management	• Roles & responsibilities • Subcontractor ESHS management planning/method statement requirements • Subcontractor requirements for ESHS self-monitoring and reporting to EPC
Communication Arrangements	• Internal Project communication arrangements (EPC – Project Owner communication) • External communication (communication with authorities, external Project stakeholders, etc.) • Emergency communication arrangements
ESHS Training Program	• Types of ESHS training • Training planning, delivery and tracking
Change Management[3]	• ESHS Change Management Process (interfaces with overall Project Change Management process) • ESHS assessment of Project/Design changes.

[3] A process for requesting, determining feasibility, planning, implementing, and evaluating Project changes.

The structure provided in the table above is a suggestion only. While the EPC may alter the structure of the HSE Plan as needed to align with the own management system requirements, the above indicated content is to be included as a minimum and in a user-friendly and fit-for-purpose format.

2.5.2 EPC CONTRACTOR CONSTRUCTION MANAGEMENT PLANS (CMP)

The CMPs required to be put in place the EPC Contractor will generally mirror in terms of topics addressed the Management Plans set at Project Owner-level (see Figure 3 – Level B). The CMPs are to further detail how the EPC Contractor and its subcontractors will implement the requirements outlined in the corresponding Project-level Management Plans and in the EPC Contract.

As indicated above, to allow flexibility to the EPC Contractor in defining procedures in line with their own management system process, **the mitigation measures addressing the specific ESHS impacts may be defined in Management Plans, Procedures and Method Statements (generically referred to herein as CMPs), as deemed appropriate by the EPC Contractor. However, the EPC Contractor is to ensure that CMPs addressing the below-indicated specific topics are defined and implemented throughout the Project execution**:

- Environment, Pollution Prevention and Control CMP (including, among others, air, noise, water supply and wastewater, biodiversity, spill prevention, contaminated land and hazardous materials management)
- Topsoil Management and Site Reinstatement CMP
- Waste Management CMP
- Chance Finds Procedure (pertaining to earthworks operations).
- Workforce CMP (including employment, working conditions and worker accommodation aspects)
- Traffic and Transport (Logistics) CMP
- Health and Safety Management Plans
- Emergency Preparedness and Response CMP
- Security Management CMPs (general/applicable Project-wide and site-specific, as needed).

In defining the mitigation and management measures to be covered by the above indicated CMPs, the EPC Contractor will use as guidance, in addition to the present ESMP provisions the Project ESIA and the Commitments Register provided in appendix to this ESMP.

Vifor Wind Farm Project stakeholder engagement activities and community relationship will be managed by the Project Owner in line with the Project Stakeholder Engagement Plan. While contractors are not required to perform Project-related stakeholder engagement, the Project Owner will work with the contractors to ensure that their CSR-related activities will be aligned with those envisaged by the Project Owner, as applicable.

The EPC ESHS CMPs will be informed by the Project (Company)-level ESHS Management Plans (refer to section 2.6 above) and shall be generally structured to provide the following information:

- Objectives of the management plan/purpose and scope,
- Reference documents (indication of other Project-level documents and EPC CMPs of relevance for the management plan; reference to relevant applicable standards);
- Identification of Project activities/operations associated with the impacts addressed by the respective CMP and triggering the implementation of all or part of the respective CMP requirements;

- Description of management practices employed to implement impacts mitigation and ensure accomplishment of related commitments;
- Roles and responsibilities;
- Subcontractors requirements (including those addressing ESHS aspects in the subcontractor method statements);
- CMP requirements implementation monitoring and reporting; staff training needs.

2.6 OPERATIONAL ESHS MANAGEMENT FRAMEWORK

This section provides a framework for the ESHS Management planning to be put in place for the operational stage of the Project. The ESHS Management during operation will ensure that the mitigation measures to be implemented at the operational stage as defined in the Project ESIA and all ESHS commitments applicable at the operational stage are met.

It is envisaged that for the management of the ESHS aspects associated with the operation stage, a similar approach with the management processes detailed in this ESMP will be considered for the ESHS management and performance monitoring.

It is currently envisaged that the operation-stage ESHS Management Framework will comprise following topic-specific ESHS management aspects:

- Operations Stage Biodiversity Management Plan including, but may not be limited to:
    - Adaptive Bird and Bat Management
    - Invasive Species Management as well as
    - Additional conservation actions to achieve no net loss of biodiversity (NNL), e.g. habitats restoration measures, if/as applicable.
    - Operations Stage Bird and bat Monitoring Programme
- Pollution Prevention Management Plan (including, among others, noise, spill prevention, contaminated land and hazardous materials management)
- Contractor and Workforce Management Plan
- Occupational H&S Management Plan
- Community Health and Safety Plan
- Emergency Preparedness and Response Plan.
- Stakeholder Engagement Plan;
- Community Investment Plan.

These operation-stage management plans will be based on the construction management plans, modified based on lessons learned and anticipating the activities of the operations phase. It is expected that the operation stage ESHS management planning documents will be more concise targeted specifically at the operation of the wind farm site.

The structure of the operational stage management plans will generally follow the requirements applicable for the construction management plans as specified in this ESMP, adapted to meet operation stage risks and issues as needed.

The above-indicated framework is indicative at this stage and will be refined at the stage of the operational readiness planning. The ESMP will therefore be updated in response to this, not later than 2 months before the Vifor Wind Farm Project enters operation.

3.0 ESHS PROJECT ORGANISATION

3.1 ESHS MANAGEMENT PROJECT ORGANIZATION

The Project Owner's ESHS management roles are represented in Figure 4.

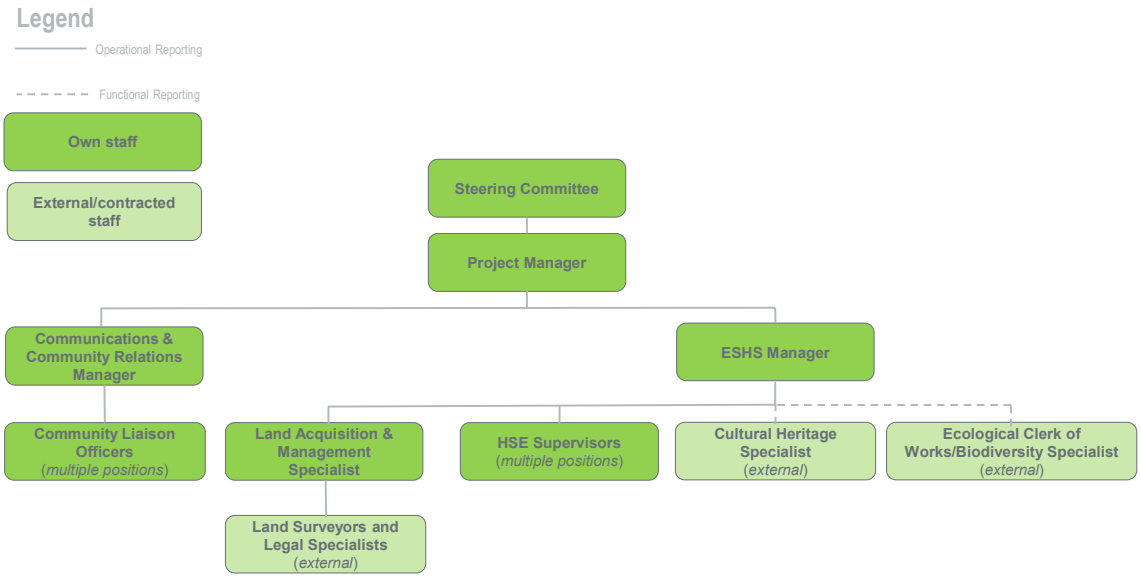


Figure 4 Project Owner's ESHS Organization Chart

3.2 PROJECT OWNER'S ESHS ROLES AND RESPONSIBILITIES [PLAN]

The Project Owner is ultimately responsible for ensuring that all Project activities comply with the Project ESHS policies, regulations and standards. The Project Owner will therefore establish an appropriate organizational structure, responsibilities, practices and will ensure the resources necessary for the ESHS management during the Project execution.

Indicated staff may sit within Project Owner or may be part of the Owner's Engineer organization.

Specific main responsibilities of key Project Owners staff are summarized in Table 3-1 below. The staff job descriptions detailing individual responsibilities will be aligned with the requirements summarized herein.

Table 3-1 Key Project Owner staff and associated responsibilities

Role	Responsibility
Senior Management	• Overall accountability for the Project including delivery in line with applicable national and international standards. • Ensures allocation of sufficient resources for the ESMP implementation including for ESHS organization, permitting, training, equipment and qualified personnel. • Ultimate responsibility for ensuring implementation of required corrective actions including in response to identified ESHS non-compliances or incidents. • Ensures periodical review of the ESMP effectiveness in line with the provisions of this plan.

Role	Responsibility
ESHS Manager	• Appropriately qualified professional familiar with ESHS aspects associated with internationally financed projects implementation. • Performing duties both at corporate level and partially on site.
	• Provide ESHS resources for implementation of the Project ESHS management requirements. • Responsible for identifying any ESHS specialised expert support required at various project implementation stages and sourcing these as needed; • Inform EPC and Contractors on ESHS responsibilities as defined in this ESMP and detailed in the topic-specific Management Plans and ensure these are understood and implemented throughout all stages. • Ensure that ESHS risks are systematically identified and managed (assessed avoided or mitigated) • Ensure the review and acceptance by Project Owner of EPC Contractor ESHS Management Plans • Ensure the ESHS oversight of EPC Contractors including training, auditing and corrective actions. • Manage the ESHS team's budget and ensure that ESHS team's activities are effectively executed. • Provide the Project management team with ESHS management advice, guidance and assurance. • Communicate the content of this ESMP (including any updates) to the Project Owner and EPC Contractor teams and act as the focal point to promote implementation, performance monitoring and provide guidance and support. • Manage the review and acceptance of EPC Contractor ESHS Management Plans. • Inform EPC Contractors on ESHS responsibilities as defined in this plan and detailed in the Project ESHS Management Plans and ensure these are understood and implemented throughout all construction stages. • Act as focal point for EPC Contractor ESHS oversight in accordance with this ESMP. • Ensure that all ESHS-related incidents are reported and dealt with effectively and lessons learned are shared in accordance with the Project incident reporting procedure. • Support with organization of and participation in the review and audits of the EPC contractor ESHS performance with respect to the requirements of this ESMP.
Communications and Community Relations Manager	• Appropriately qualified professional familiar with social aspects associated with internationally-financed projects implementation. • Performing duties both at corporate level and on site.
	• Provide functional support to the field staff to implement the social requirements of this ESMP and of the Project Owner's management system; • Coordinate the implementation of the Stakeholder Engagement Plan; • Provide timely information to communities on all Project works through regular meetings with stakeholders and ensure that long term relationships are not negatively impacted. • Provide information on potential issues with local communities and stakeholders and contribute to implementing specific measures to prevent and mitigate risks. • Identify key stakeholders, requiring engagement in the frame of Project stakeholder engagement processes/activities and update regularly the stakeholder mapping in response to stakeholders activities and their relationship with the Project.

Role	Responsibility

	• Monitor local developments with potential to impact Project activities, and report to the Project Manager.
	• Ensure that stakeholder engagement activities are documented and evidence (e.g. Minutes of Meetings) are kept on file.
	• Perform regular review and monitoring of SEP implementation.
	• Coordinate and manage implementation of the Project Grievance Mechanism.
	  ○ Ensure Project Grievance Committee Meetings are formally documented and recorded;
	  ○ Coordinate preparation of responses to complainants and agree content with other members of the Project Grievance Committee;
	  ○ Responsible for ensuring responses to complainants are provided in line with the Grievance Mechanism provisions
	  ○ Report to Project Management Team on grievance management.
	• Take active role in the in the identification of community needs and assist in the decision process regarding Project Owner's community investment program.
	• Responsible for the successful implementation of Project Owner's community investment program.
	• Oversee Project external communications;
	• Responsible for the Project information disclosure, mass media coverage/press releases.

HSE Supervisors *(multiple positions, as needed)*	• Appropriately qualified local/national professionals reporting to ESHS Manager. • Based on site permanently for the duration of the construction works.
	• Perform oversight inspections of the EPC Contractors' and subcontractors activities to ensure they align with Project, health, safety and environmental management requirements and with the CMPs/method statements provisions pertaining to health, safety and environment. • Provide feedback on inspections findings to the ESHS Manager. • Provide HSE advice and training/deliver toolbox talks to field teams. • Report on HSE compliance and corrective actions implementation to the ESHS Manager. • Record HSE incidents and follow up on closure by EPC. • Participate in internal and external HSE audits. • Report to the ESHS Manager on daily basis and in agreed format on all health, safety and environmental matters and activities performed.
Ecological Clerk of Works/ Biodiversity Specialist *(own staff or contracted specialist)*	• Appropriately qualified biodiversity specialist familiar with internationally financed projects implementation. • Reports to HSE Manager • Based on site permanently for the duration of the construction works
	• Support with biodiversity management planning requirements implementation • Support with definition of biodiversity surveys methodologies (e.g. pre-construction/post-construction surveys etc.) and support with their implementation and adequate documentation. • Definition of bespoke method statements for works within sensitive habitats e.g. vegetation clearance (including check survey methods), flora translocation (if required), fauna translocation; and vegetation re-instatement, as applicable. • Support with supervision of implementation by on-site contractors of requirements in method statements and direct construction teams in their

Role	Responsibility
	implementation. • Support with supervision of contractors to ensure construction works are performed only in permitted project footprint and prevent that adjacent areas are affected. • Support with provision of toolbox talks to contractors to explain ecological sensitivities of the site and proposed works/methodology to ensure compliance. • Support with verification that Biodiversity Management Plan provisions are followed. • Support with construction works monitoring • Support with ensuring that findings from the field are reported back to relevant project stakeholders at regular intervals. • Support with reviewing species data in the field to ensure that the receptors selected for monitoring are appropriate. • Support with undertaking protected species check surveys • Support with identification of suitable receptor sites for species translocation • Provide oversight and direction to staff/contractors undertaking species translocations. • Support with undertaking post-construction monitoring.
Community Liaison Officer *(multiple positions, as needed)*	• Appropriately qualified local professional/local community member reporting to the Communications & Community Relations Manager. • Based on site permanently for the duration of the construction works.
	• Acts as local liaison between the Project and the community/local stakeholders and maintains positive relationship with them. • Provide timely information to local community members on all Project works through regular meetings with stakeholders and ensure that long term relationships are not negatively impacted. • Provide information to Project management on potential issues with local communities and stakeholders and contribute to implementing specific measures to prevent and mitigate associated risks • Take active role in identification of community needs and assist in the decision process regarding the Project's community investment program. Contribute to the successful implementation of the Project's community investment program. • Identify key stakeholders, requiring engagement in the frame of the Project stakeholder engagement processes/activities and support with updating regularly the stakeholder mapping in response to stakeholders' activities and their relationship with the Project. • Monitor local community developments with potential to impact Project activities, and report to the Communications & Community Relations Manager. • Support with the Grievance Mechanism implementation at field level. Assist local community members in filing their grievances as needed. • Report on all activities performed to the Communications & Community Relations Manager on daily basis and agreed format.
Cultural Heritage Specialist	• Appropriately qualified cultural heritage specialist familiar with internationally financed projects implementation. • Reports to HSE Manager • Based on site for the duration of the land disturbing execution
	• Coordination of Cultural Heritage Management implementation • Cultural heritage supervision of land disturbing works execution

Role	Responsibility
	• Supervision of grave relocation works • Supervision of Chance Finds Procedure implementation by contractors
Land Acquisition and Management Specialist	• Appropriately land acquisition specialist familiar with internationally financed projects implementation. • Reports to HSE Manager • Based on site for the duration of the land disturbing execution • Performing duties both at corporate level and on site.
	• Responsible for land acquisition and livelihoods restoration • Coordinates external specialist teams in charge of land acquisition • Supports the Communications and Community Relations Manager in resolution on land and livelihoods-related grievances resolution.

3.3 EPC CONTRACTOR ESHS ROLES AND RESPONSIBILITIES [PLAN]

It is EPC Contractor`s responsibility to ensure that ESHS compliance is achieved according to the requirements and processes defined in this ESMP. In attaining this objective, the EPC Contractor establishes and maintains through its own ESHS Management System a documented process to identify risks and impacts, implements adequate management measures to mitigate these in line with the Project Requirements, Regulations and Standards specified in section 2.2 of this ESMP. EPC Contractor ESHS monitoring of its own activities and its subcontractors ESHS performance is referred to as 'self-verification' and forms the first level of ESHS compliance monitoring under this ESMP.

The EPC Contractor is responsible for:

- Self-verification of its own compliance by maintaining a system to manage ESHS aspects and impacts in line with Project Owner's and its own management system requirements;
- Ensuring that all ESHS Non-conformances and incidents are reported and dealt with effectively and that lessons are learned;
- Ensuring their organizations have adequate resources and expertise for ESHS compliance monitoring and control to meet the ESMP requirements;
- Keeping the Project Owner fully informed of any ESHS issues;
- Recording and reporting monitoring observations, required actions and raising non-conformance reports where appropriate;
- Instructing own and subcontractors staff in their responsibilities with respect to compliance assurance and incident reporting and response;
- Ensure facilitation of any grievances they may receive into the Project Grievance Mechanism
- Cooperating with the Project Owner in relation to ESHS compliance assurance activities;
- Participating in joint inspections, performance reviews and audits as required by the Project Owner;
- Providing Project Owner with access to monitoring records (including all relevant documentation and databases) as required;
- Ensuring adequate expertise, planning and resources are in place to appropriately identify ESHS risks sufficiently in advance of construction, in order to ensure compliance;
- Identifying ESHS risks as part of its planning processes and through implementation of appropriate mitigation measures and communicating these to its workforce;

- Reporting to the Project Owner on ESHS performance, including KPIs on weekly and monthly basis in a commonly agreed format;
- Maintaining updated registers that capture the range of compliance monitoring and assurance information necessary to demonstrate that Project ESHS standards are being met during construction works execution and reporting on this to the Project Owner.

To ensure implementation of the above, the EPC Contractor is required to structure their organization to include sufficient and adequately qualified ESHS staff. The EPC Contractor is responsible for determining the required number of ESHS personnel to ensure that Project ESHS policies, regulations and standards are met throughout works execution.

Furthermore, the EPC Contractor is responsible to ensure that their subcontractors implement throughout their Project activities the requirements set forth in this ESMP and subordinated plans. For this purpose, the EPC Contactor is required to put in place adequate, documented processes for supervision and monitoring of subcontractor responsibilities.

EPC Contractor's ESHS team is to include appropriately qualified personnel covering following roles (individual positions may combine multiple roles as appropriate):

- HSE Manager(s) (responsibilities including Environmental, Social, Health and Safety, and Cultural Heritage aspects);
- ESHS Supervisors
    - multiple positions as needed;
    - to ensure permanent presence of one ESHS Supervisor on each construction work site and each shift.

In case, during project execution, the monitoring of EPC Contractor's ESHS performance as performed by the Project Owner indicates insufficient ESHS oversight, compliance assurance resources or practices by the EPC or subcontractors, the Project Owner is entitled to enforce required corrective actions on the EPC Contractor. This may include requiring the EPC Contractor to allocate additional ESHS staff and resources.

4.0 ESHS MANAGEMENT CONTROLS

4.1 GENERAL APPROACH

ESHS Controls in place during the Project construction stage are based on an ESHS compliance assurance (monitoring and reporting) process to ensure that ESHS Project policies, regulations and standards are met.

Project Owner's management controls ate focused on the following:

i. implementation of the Project's ESHS Management System described in this ESMP,

ii. implementation by the EPC Contractor of the Project Policies, Regulations and Standards,

iii. oversight of EPC Contractor's activities, and

iv. compliance assurance to verify that the works are performed according to the Project Policies, Regulations and Standards and in line with ESHS management system.

This ESHS compliance assurance process (including the full range of environmental, occupational health and safety, labour and working conditions, socio-economic, community safety and cultural heritage aspects) is implemented at two levels:

- First level: EPC Contractor's Self-Verification program (inspections, monitoring, reporting) to demonstrate compliance with ESHS policies, regulations and standards, and to provide evidence that EPC meets their obligations. Includes oversight of subcontractors.
- Second level: Project Owner's Oversight and Assurance activities.

Oversight is performed by the Project Owner's ESHS staff to ensure that Project Owner's own and EPC Contractor's activities (including their ESHS self-verification) are aligned with the Project standards and the provisions of this ESMP. This includes review of EPC ESHS reports, documentation, monitoring data, procedures & plans, undertaking formal site inspections and attending meetings with EPC Contractors to drive performance and address issues.

Assurance activities are performed by personnel (or specialized service providers) not directly involved in the works being checked, to provide an additional layer of assurance beyond self-verification and oversight and measure the compliance of Project activities. Assurance process comprises targeted audits and formal reviews. Assurance activities are typically detailed and focused on defined risk areas or guided by feedback from the results of the self-verification and oversight activities.

In addition to the above, independent audits of compliance with Project Requirements, Regulations and Standards and including both Project Owner's and EPC Contractor's performance are performed periodically, typically on annual basis.

The controls put in place to manage, monitor, measure and report compliance with Project ESHS policies, regulations and standards during the Project construction stage are outlined in this ESMP section.

4.2 EPC CONTRACTOR SELF-VERIFICATION PROGRAM [DO]

EPC Contractor is required to operate an Environmental and Social Management System (ESMS) in alignment with the principles of ISO14001 and OHSAS 18001, which requires self-verification of compliance in accordance with the plan-do-check-review cycle (ESMS accreditation to ISO14001 and OHSAS 18001, although recommended, is not a requirement).

As part of its construction works planning, EPC Contractor is required to prepare and implement an EPC HSE Plan and topic-specific Contractor Management Plans (refer to sections 2.5.1 and 2.5.2). These EPC Contractor ESHS management planning documents will detail how the EPC Contractor complies with the specific Project ESHS (including environmental, occupational health and safety, labour and

working conditions, socio-economic, community safety and cultural heritage aspects) policies, regulations and standards through a self-verification program including:

- Performing ESHS inspections and audits of own (EPC) and subcontractors activities;
- Performing ESHS monitoring;
- Implementation of a non-conformance and incident notification and response procedure;
- Implementation of an EPC Contractor ESHS Action Tracking System.

4.2.1 EPC CONTRACTOR INSPECTIONS AND AUDITS

To provide assurance that the provisions of the topic-specific management plans/method statements are implemented effectively, EPC Contractors are required to implement a program of documented inspections and audits at Project sites and the associated facilities addressing own activities and those performed by subcontractors.

This includes undertaking walk-around inspections during construction works execution to visually monitor that mitigation measures are implemented, undertaking joint inspections with the Project Owner, and engagement with project-affected parties, stakeholders and regulators. These activities will also include, in addition to the ESHS matters, inspection of subcontractors' workforce management aspects (including labour and working conditions and workers accommodation) against Project Requirements, Regulations and Standards with quarterly frequency.

EPC Contractor's internal audits will be performed in line the EPC Contractor`s management system procedures as approved by the Project Owner. As a minimum ESHS internal audits are to be performed by the EPC Contractor on annual basis. Focused audits or performance reviews addressing specific aspects as required in line with the Project stage are to be performed every 6 months. The audits are to be performed by an interdisciplinary team of appropriately qualified health and safety, environmental and social auditors. Project Owner's ESHS staff may join the EPC audit team and participate in the EPC Contractor's internal audits.

4.2.2 EPC CONTRACTOR ACTION TRACKING, NON-CONFORMANCE AND INCIDENT RESPONSE AND NOTIFICATION SYSTEM

In response to any issues, observations, non-conformances and incidents, the EPC Contractor is to propose appropriate corrective actions and record these (including responsibilities and timescale for completion) in its own ESHS (including environmental, occupational health and safety, labour and working conditions, socio-economic, community safety and cultural heritage aspects) Action Tracking System (ATS). The ATS shall be implemented to ensure recording and follow-up of Non-conformances and incidents and their associated corrective actions.

Project Owner's ESHS management staff will regularly review EPC Contractor's ATS, typically on weekly basis, and will follow-up on progress to confirm closure of measures.

A two-tier non-conformances management process has been defined for the Vifor Wind Farm Project (refer to section 4.4) following a risk-based approach in line with the Project Owner's Non-Conformance Management Procedure. Non-conformances identified as result of inspections, monitoring and audits performed are recorded by EPC Contractor as actions to be addressed in line with their own management systems and reported to Project Owner in the monthly reports as a minimum.

EPC Contractor is required to implement their own ESHS Non-conformances and Incident Reporting and Investigation procedures. All ESHS incidents and near misses will be notified to the Project Owner. Incidents will be notified immediately as they occur, while near misses will be reported on weekly basis.

The Project Owner reserves the right to carry out its own investigations of EPC accidents/incidents/near-misses/non-conformances or assist the EPC investigation teams.

Project Owner's ESHS Manager will review the Non-conformances and incidents reports of the EPC Contractor. Project Owner's ESHS Manager will regularly meet relevant EPC Contractor representatives to review the Action Tracking System and status of actions progress and closure.

4.2.3 EPC CONTRACTOR MONITORING AND REPORTING

The procedures for monitoring implementation and outcomes of the ESHS mitigation measures, ESHS KPIs and environmental and social monitoring are defined by the EPC Contractor in their CMPs and method statements. The monitoring frequencies, parameters, methodology and duration are determined based upon the site activities requiring monitoring and are assessed on a case-by-case basis dependent upon construction activity type and location.

EPC Contractor is responsible for reporting monitoring results to the Project Owner on monthly basis.

4.3 PROJECT OWNER'S ESHS OVERSIGHT AND ASSURANCE PROGRAM

4.3.1 PROJECT OWNER'S ESHS OVERSIGHT (MONITORING) [DO]

ESHS oversight is aimed at monitoring construction activities to determine whether environmental, occupational health and safety, labour and working conditions, socio-economic, community safety and cultural heritage mitigation measures implemented by EPC Contractors are effective (i.e. whether these avoid, minimise the impacts as intended, or whether work practices require revision).

During construction stage, ESHS oversight monitoring is coordinated by the Project Owners ESHS Manager and performed through ongoing review and follow-up on EPC Contractor's weekly and monthly reports and on non-conformance/incident reporting, as well as through inspections of the construction worksites.

The ESHS oversight inspections are performed regularly, on monthly basis, and are intended to highlight key EPC Contractor conformance aspects, and their outcome is used to determine the required actions. In addition to the regular monthly inspections, unscheduled inspections (spot-checks) of critical/key Project areas are performed as needed. The locations and timing of the unscheduled inspections are determined based on the ongoing Project activities and issues, as informed by the EPC Contractor's weekly/monthly reports and the non-conformance/incident reporting outcomes.

The ESHS oversight is aimed at addressing all Project ESHS aspects and worksites and ensuring that each of them are visited by the Project Owner's ESHS management site weekly as a minimum or more often as needed in response to ongoing issues and ESHS management needs.

Checklists may be used in support of the field inspections which may be organized based on specific ESHS topics addressing key aspects associated with the construction works being inspected.

Inspections observations and findings are discussed with EPC ESHS representatives to determine and agree on any actions required.

Project Owner's ESHS oversight (monitoring) reports are generated as simple records to include:

- indication of the construction works/site inspected;
- indication of the construction activities inspected;
- observation notes providing description of positive aspects, good practice or issues/non-compliances identified;
- photographic evidence of the observations made/issues identified.

Where ESHS oversight (monitoring) inspections identify issues or Non-conformances, the remedial actions required in response are discussed and agreed with the EPC Contractor and recorded into the EPC Contractor's ATS.

4.3.2 PROJECT OWNER'S REGULAR ESHS OVERSIGHT REPORTING [DO]

A brief ESHS oversight report is provided by the ESHS Manager to the Project Management on monthly basis. The report summarizes the key issues and challenges during the reporting period as resulted from the ESHS oversight inspections and the review of the EPC Contractors' ESHS reports and ATS status.

Regular reporting is intended to keep the Project Management informed on ESHS aspects, so that direction and feedback can be provided to EPC Contractors and leadership support obtained for addressing key and more strategic issues at appropriate decision levels as applicable.

4.3.3 PROJECT OWNER'S SOLUTIONS ESHS ASSURANCE AUDITS [CHECK]

Environmental, social, health and safety audits of the EPC Contractor are performed on annual basis or upon attaining specific construction works delivery milestones by the EPC Contractor (e.g. 0 – 50%, 50-100% construction works execution).

The ESHS Assurance Audits are conducted primarily by Project Owner's own staff independent of the activities audited, or by contracted third-party specialists to provide assurance of oversight and self-verification activities.

The EPC Contractors are formally notified about the ESHS audits and their scope which include but may not be limited to:

- EPC Contractor ESHS organization/staffing adequacy;
- EPC Contractor ESHS documentation;
- Implementation by EPC Contractor of the ESMP and CMPs, method statements and specific ESHS Procedures;
- ESHS training and inductions;
- ESHS Key Performance Indicators (KPIs);
- ESHS Non-conformance and incident reporting, tracking and closure.

Audit protocols are developed based on the defined scope and used by auditors for guidance and for recording audit observations including good practice and non-conformances.

Audit outcomes are summarized in reports and formally communicated to and discussed with the EPC Contractor. Any required corrective actions are agreed with the EPC Contractor and recorded in their ATS and/or Non-conformance Reporting system as appropriate. Progress in addressing the audit findings is followed up on a regular basis to close the open and pending actions and reported monthly.

4.3.4 KEY PERFORMANCE INDICATORS (KPI) [CHECK]

The Project Owner and the EPC Contractor will track and monitor various performance indicators both leading and lagging so as to identify potential trends in environmental, safety and social performance, as defined in the topic-specific management plans.

4.4 INCIDENT AND NON-CONFORMANCES REPORTING, INVESTIGATION AND CORRECTIVE ACTIONS [ACT]

Non-conformances and incidents are recorded, reported, investigated and addressed.

All non-conformances and incidents (including near misses) will be investigated to establish the immediate and underlying/root causes (plans must be established to deal with immediate risks following unforeseen events) and to identify actions to:

- Evaluate and correct the situation as quickly as possible;
- Assess and limit adverse ESHS consequences of the incident;
- Prevent reoccurrence and improve ESHS performance; and
- Ensure planned actions integrate with other ESHS requirements, including contractor interfaces where appropriate;
- Improve future risk management;
- Ensure lessons are learned throughout the Project organization;
- Demonstrate commitment to effective ESHS management.

Non-conformances are unapproved deviations from Project ESHS Specifications or Standards or deviations from Project Owner's or EPC Contractor's Management Plans. These are typically identified through the oversight and assurance process (e.g. daily monitoring, oversight inspections and audits).

Non-conformities may be categorised as minor or major and are recorded and reported in a pre-defined format including: description of source/cause, categorization (severity), description and evidences, responsible party and corrective actions.

Non-conformances are recorded in a register maintained by the EPC Contractor and acting as a tool for following up on non-conformances to closure.

Incidents are classified using a 3-level severity scale (i.e. Minor, Serious, Major). All incidents and accidents taking place on contractor's locations and/or facilities, while under contract with the Project Owner will be reported to the Project Owner's management by e-mail within 12 hours from incident occurrence. In addition, immediate telephone notification will be made for severity 2 and 3 incidents.

All incident investigations are conducted and documented to appropriate level of detail dependent upon the severity of the incident.

Actions identified as being required in the incident investigation report are recorded on Corrective Action Forms to prevent reoccurrence of similar incident. Action plans for the remedial measures implementation as identified in the investigation are defined and include information on responsibilities, resources required, completion dates and reporting requirements.

The status of corrective actions and associated action plans are tracked and once all the actions are completed, this is recorded in a Corrective Action Form signed off for closure. The status of corrective actions implementation and closure is tracked in the Project Incident Register.

Incident reports and key incident statistics are analysed for trends for each Project activity and reported on a monthly basis as part of the performance monitoring program. Relevant findings are communicated throughout the Project organization.

Arrangements for incident reporting and investigation system, as well as the effectiveness of corrective actions are periodically reviewed, as a minimum with annual frequency, as part of the management review process.

4.5 EXTERNAL REPORTING [ACT]

The Project Owner will prepare an annual report on environmental, health and safety performance and implementation of the stakeholder engagement plans and grievance procedure. The annual report will be disclosed on the Project website.

In addition, the Project Owner commits to following external reporting:

- Statutory Notifications and Reporting to national regulatory bodies as required in line with the applicable regulations and Project permits, and
- Incident Notification and Reporting.

According to the incident reporting procedure in place, medium and major incidents (fatalities included) are to be reported to authorities within 2 hours from occurrence. Any such incidents will be also reported to Vifor Wind Farm Project lenders within 72 hours.

All environmental and social incidents will be appropriately documented, notified and reported in accordance with established procedures as indicated in previous sections of this ESMP.

Incident notification and reporting to relevant national regulatory bodies will be performed in line with applicable regulations in force and as stipulated in permits and licenses.

5.0 MANAGEMENT OF CHANGE [DO]

The process in place to manage changes impacting ESHS aspects of the Project are integrated in the overall change management process applicable to all Project Changes.

ESHS changes addressed in this ESMP section include:

- new planned activities or processes and or changes in project activities, design or footprint leading to potential impacts that were not subject to assessment as part of the Project ESIA package;
- changes to ESHS management, mitigation and monitoring commitments not considered in the Project ESIA package;
- changes/updates of legal and regulatory requirements, technical codes and business objectives that may trigger potential impacts that were not subject to assessment as part of the Project ESIA.

Triggers for consideration in relation to changes specified above may include:

- Design refinement or detailed design outcomes
- Changes in construction methodologies;
- Field obstacles during construction;
- Results of further field surveys and monitoring;
- Comments/concerns submitted by public/stakeholders/lenders;
- Changes in regulations or requirements by regulatory bodies.

The Management of Change provides for a simple ESHS management of change process, as represented in Figure 5 below.

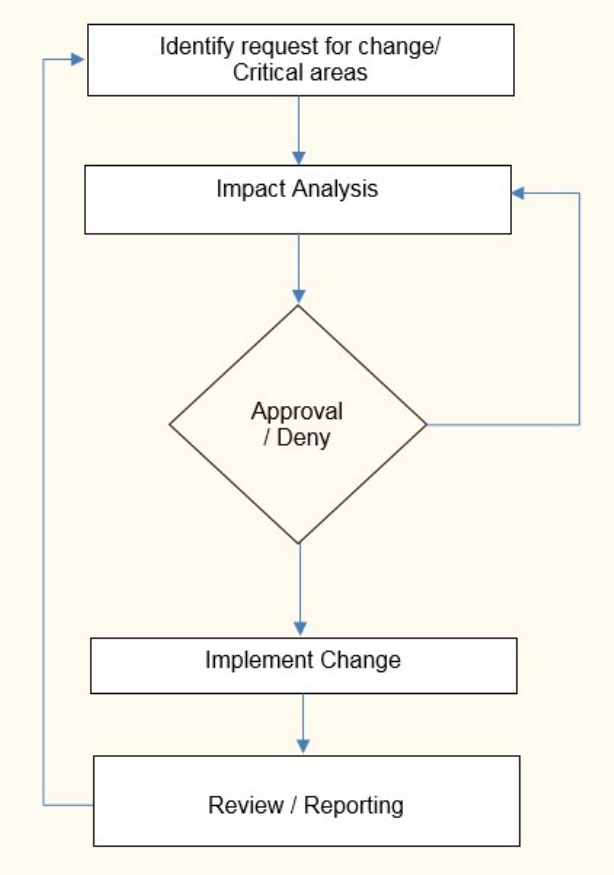


Figure 5 ESHS Change Management Process

The ESHS change management process is managed by the ESHSE Manage and comprises the following main steps.

Change Identification

ESHS changes are identified various ways, including requests by the EPC, engineering, construction teams and are summarised in a Management of Change Form.

Change Impact Analysis and Notification of Changes

Upon receiving the Management of Change Form, the HSE Manager with the support of the ESHS Specialist undertakes performs:

- An assessment of proposed change risks
- A screening review of any proposed changes that have the potential to give rise to new or additional significant impacts (positive or negative) which differ to those identified as part of the ESIA Package.

The Screening will be performed by/under the direction of the ESHS Manager with involvement, as warranted, of other Project Owner staff and EPC Contractor Environmental Expert/Design Team, and/or with support from external specialized consultants. To assist with the review, a Change Screening Matrix will be used.

The potential outcomes of the Changes Screening can be grouped in 3 tiers in relation to environmental and social impacts (in line with the corresponding definitions in the ESIA package) as follows:

- Tier 1 Changes – Changes where the potential impact of the change prior to mitigation will be no more than minor.
- Tier 2 Changes – Changes where the potential impact of the change prior to mitigation will be moderate.
- Tier 3 Changes – Change were the potential impact of the change prior to mitigation will be major.

Tier 1 Changes will be implemented by the Project Owner without notifying the Vifor Wind Farm Project lenders.

For Tier 2 Changes, Project Owner will inform the Project Lenders of the change, but will not have to secure their approval prior to implementing the change.

For Tier 3 Changes, Project Owner will seek approval from the Project Lenders prior to implementing the change.

The following changes will be considered as Tier 3 Changes:

- Changes to the Project design and footprint or activity that may result in a potential new major impact, or elevate an impact already assessed to a potential major impact.
- Changes in commitments to mitigate or avoid potential impacts that may result in a potential new major impact.

6.0 ESHS TRAINING [DO]

6.1 OBJECTIVES

The Project Owner is committed to ensure that ESHS training is delivered to all staff as required for delivering their roles. In the frame of the recruitment process, Project staff is verified for competency and experience. Following employment with the Project, the staff receive adequate induction and ongoing ESHS training according to a training plan.

The aim of the induction training is to make Project staff aware of the actual or potential actual or potential ESHS risks associated with their work activities, their behaviour, and of the potential consequences of departure from the Project ESHS procedures.

In addition to the induction, the new Project staff will further undertake specific ESHS training commensurate with their roles. Employed training process shall take into account different levels of responsibility, ability, language skills, and risks associated with each position.

A system for evaluating the effectiveness of the training or action taken will be implemented. Training records will be documented and held on file.

EPC Contractor and service providers are contractually bound to implement specified ESHS training requirements.

6.2 EPC OBLIGATIONS

The EPC Contractor's ESHS training and competency requirements are contractually specified.

EPC Contractor shall ensure that all construction employees (own and subcontractor staff) are adequately qualified and have the ESHS knowledge and skills required for the execution of their work duties.

Prior to the commencement of the work, EPC Contractor shall submit a Training Plan identifying specific training requirements against each job title for review and acceptance by the Project Owner.

The Training Plan is to be based on an analysis of training requirements and should comprise:

- an induction training program to be delivered to all personnel (own and subcontractor staff), vendor representatives and site visitors;
- general and job/task-specific training as needed for the performance of the duties to which the person (own and subcontractor staff) is assigned to.

The Training Plan will include a Competency/ Training Matrix. The Competency/ Training Matrix is to be developed as a tool documenting and comparing the required competencies for a position with the existing skill level of the employees performing the roles and shall be used to determine the training needs. The Competency/ Training Matrix is also to be used as a tool for managing people development.

The Training Plan and the Competency/ Training Matrix are to provide the mechanism to ensure that training is timely delivered, and the training program is effective. For this purpose, the EPC Contractor is to perform regular evaluations throughout the construction works period to ensure that the Training Plan has achieved its objectives i.e. that all staff (own and subcontractor employees) are suitably qualified, competent and fit for their job duties. The frequency and timing of such evaluations is to be determined by the EPC Contractor and subject to Project Owner's approval.

Implementation of ESHS training requirements will be reviewed by the Project Owner throughout the contract period according to the provisions of this ESMP.

7.0 MANAGEMENT REVIEW [CHECK]

Management Review is a key element of the ESMP Cycle (Figure 1), closing the adaptive management loop as part of the continual improvement process of the implemented management system.

Project Owner's and EPC Contractor's management reviews are undertaken at several levels of the organization and include the following:

- Project Owner performance reviews.
- EPC Contractor's ESHS functional and project cross-functional reviews.
- Project management meetings.
- Weekly and monthly ESHS function meetings.

Project Owner's senior management periodically review the overall effectiveness of the ESHS management system, annually as a minimum. The scope of the ESHS Management Review include:

- Provide management with a summary of yearly ESHS performance, including:
    - Non-conformances and corrective actions
    - Monitoring and measurement results
    - Audit results
    - Stakeholder feedback and concerns (as resulting from the stakeholder engagement process)
    - Adequacy of ESHS resources
    - ESHS performance
    - ESHS incident trends, response, and reporting.
- Identify opportunities for and drive continual improvement.
- Summarize the significant ESHS risks and envisaged risk management in the following period.

The annual ESHS Management Review will inform the annual ESHS planning and targets as well as any changes including resource needs.

ATTACHMENT 1: RELEVANT LAWS AND REGULATIONS

NATIONAL LEGISLATION

General Legislation

- Law no. 50/1991 regarding the authorization of execution of construction works (Law no. 50/1991);
- Government Decision no. 839/2009 for the approval of the Methodological Norms of application of Law no. 50/1991;
- Law no. 350/2001 regarding territorial landscape and urban planning (Law no. 350/2001);
- Order no. 233/2016 for the approval of the Methodological Norms of application of Law no. 350/2001;
- Government Decision no. 525/1996 for the approval of the general urbanism regulation;

General Environmental Legislation

- Law on Environmental Protection no. 137/1995, amended several times;
- Law on Environmental Impact Assessment no. 92/2018
- Law on Ambient Air Quality 104/2011
- Law on Waters no. Law on Waters 107/1996
- Law on Nature Protection no. 49/2011 amending Law no. 57/2007
- Law on Waste no. 92/2021
- Law on Protection against Noise 121/2019

Biodiversity and Protected Areas

- Emergency Government Ordinance no. 57/2007 on the regime of protected natural areas, the preserve of natural habitats, wild flora and fauna – which transposes Directive 79/409/EEC on the conservation of wild birds, the Habitats Directive 92/43/EEC and Directive 2006/105/EC adapting Directives 73/239/EEC, 74/557/EEC and 2002/83/EC in the field of environment, by reason of the accession of Bulgaria and Romania;
- Government Decision no. 663/2016 setting up the protected natural areas and declaring special protection areas, as integral part of the European ecological network Natura 2000 in Romania;
- Government Decision no. 1284/2007 regarding the institution of bird protection areas as integral part of Natura 2000 European ecological network in Romania – which transposes the Habitats Directive 92/43/EEC;
- Order no. 46/2016 establishing protected natural areas and declaring the sites of community importance as an integral part of the European ecological network Natura 2000 in Romania;
- Order no. 1964/2007 on the institution of the protected natural area regime for sites of community importance as integral part of Natura 2000 European ecological network in Romania, which transposes the Birds Directive 2009/147/EC;
- Law no. 5/2000 re the approval of the Spatial Planning of the National Territory – Section III – protected areas.

Emissions and Air Quality

- Law no. 278/2013 on industrial emissions – which transposes the Industrial Emissions Directive 2010/75/EU;

- Emergency Government Ordinance no. 104/2001 on ambient air quality – which transposes the Ambient Air Quality Directive 2008/50/EC and Directive 2004/107/EC relating to arsenic, cadmium, mercury, nickel and polycyclic aromatic hydrocarbons in ambient air;
- Government Decision no. 780/2006 establishing a scheme for greenhouse gas emission allowance trading – which transposes Directive 2003/87/EC establishing a scheme for greenhouse gas emission allowance trading within the Community and amending Council Directive 96/61/EC;

Water

- Water Law no. 107/1996 – transposing Directive 2000/60/EC establishing a framework for Community action in the field of water policy and Directive 2007/60/EC on the assessment and management of flood risks;
- Law no. 458/2002 on the drinking water quality – which transposes Articles 9 and 15 of the Drinking Water Directive 98/83/EC;
- Order no. 662/2006 approving the Procedure and competencies for the issuance of water management permits and authorizations;
- Order no. 1406/2003 approving the Methodology for the quick assessment of environmental and human health hazards;
- Order no. 15/2006 re the approval of the Procedure for the temporary suspension of the water management authorizations and of the Procedure for amending and withdrawal of water management permits and authorizations.

Soil / Contaminated Land

- Government Decision no. 1408/2007 on the methods of investigation and assessment of soil and subsoil pollution;
- Government Decision no. 1403/2007 on the rehabilitation of the areas where the soil, subsoil and ecosystems were affected;

Noise (Airborne)

- Government Decision no. 321/2005 in relation to the assessment and management of environmental noise – which transposes Environmental Noise Directive 2002/49/EC;

Wastes and Chemical Substances

- Law no. 249/2015 relating to packaging and packaging waste – which transposes Packaging and Packaging Waste Directive 94/62/EC;
- Law no. 211/2011 on waste regime – which transposes the Waste Framework Directive 2008/98/EC;
- Law no. 360/2003 in relation to waste and hazardous materials management;
- Emergency Government Ordinance no. 196/2005 on the Environmental Fund;
- Government Decision no. 570 / 2016 regarding the approval of the Program for controlled elimination of evacuations, emissions and losses of priority dangerous substances and other measures concerning the main pollutants – which transposes Directive 2008/105/CE, Directive 2009/90/CE and Directive 2013/39/UE;
- Government Decision no. 477/2009 establishing the applicable sanctions for failure to comply with the provisions of Regulation no. 1907/2006/EC concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals, establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and

Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC;

- Government Decision no. 1061/2008 on the transport of hazardous and non-hazardous waste on the Romanian territory;
- Government Decision no. 235/2007 regarding management of waste oils;
- Government Decision no. 856/2002 on waste management evidence and approving the waste list, including hazardous waste;
- Order no. 1084/2003 approving the Notification procedures for activities posing major accident hazards involving dangerous substances and the respective major accidents;
- Order no. 757/2004 approving the Technical norms on waste storage;

National Legislation on Social Aspects

- Land Law no. 18/1991;
- Law on Cadastre no. 105/2019
- Law on Property and other al Rights no. 185/2018
- Law no. 247/2005 on property and justice reform and some accompanying measures, with special references on Legal circulation of land; amended by Decision 597/2020 on the exception of unconstitutionality conditioning the right to compensation of the holders of compensation titles, for his selection of a certain mode of compensation;
- Government Emergency Ordinance 34/2013 on the organization, management and operation of permanent grassland, and amending and supplementing Law 18/1991 on Land Reclamation.
- Law on Road Traffic Safety no. 195/2002
- Government Ordinance no. 43/1997 on roads regime;
- Law on Labour no. 53/2003
- Government Decision no. 600/2007 regarding protection of young employees against economic exploitation, transposing Directive 92/33/CE concerning protection of young employees at workplace;

Cultural Heritage

- Law on Cultural Heritage no. 422/2001 and subsequent amendments no. 26/2008 and no. 451/2002
- Law no. 182/2000 on the protection of the national cultural movable heritage;
- Government Ordinance no. 43/2000 on the protection of the national cultural heritage and the declaration of some archaeological sites as of national interest;
- Government Ordinance no. 68/1994 on the protection of national cultural heritage;
- Order no. 2361/2010 approving the List of Historical Monuments 2010;
- Order no. 2562/2010 approving the Procedure for granting archaeological research authorizations;
- Order no. 2260/2008 approving the Methodological norms for classification and evidence of historical monuments;
- Order no. 2518/2007 approving the Methodology for enforcement of the archaeological discharge procedure;

- Order no. 2392/2004 regarding the Standards and procedures in archaeology;
- Order no. 2682/2003 approving the Methodological guidelines regarding the classification and recording of the historical monuments, the List of Historical Monuments, the Analytical record card for historical monuments and the Minimal record card for recording historical monuments;
- Ordinance no. 43/2000 on the protection of the archaeological heritage and declaring certain archaeological sites as national interest areas Ministry of Culture;
- Decision no. 2314/2004 re the approval of the list of historical monuments and missing monuments;

Health and Safety

- Law no. 64/2008 on the safe operation of pressure vessels, lifting equipment and fuel-consuming devices;
- Law no. 319/2006 on safety and health at work, which transposes Directive 89/391/EEC on the introduction of measures to encourage improvements in the safety and health of workers at work;
- Government Decision no. 1425/2006 for approving the Methodological Norms for application of Law no. 319/2006;
- Law no. 307/2006 on fire safety;
- The Labour Code, approved by Law no. 53/2003;
- Government Decision no. 571/2016 approving the categories of buildings and facilities which are subject to endorsement and/or authorization for fire safety;
- Government Decision no. 971/2006 on the minimum requirements for the provision of safety and/or health signs at work - which transposes Directive 92/58/ EEC on the minimum requirements for the provision of safety and/or health signs at work;
- Government Decision no. 1091/2006 on the minimum safety and health requirements for the workplace - which transposes Directive 1989/654/EEC Directive 1989/654 concerning the minimum safety and health requirements for the workplace;
- Government Decision no. 1146/2006 on the minimum safety and health requirements for using work equipment, transposing Directive 1989/655/CEE on the minimum requirements for using work equipment by workers;
- Order no. 163/2007 approving the General fire safety norms;
- Government Decision no. 493/2006 on the minimum requirements for protection of safety and health protection of workers against hazards arisen from exposure to noise, transposing Directive 2003/10/CE concerning the minimum safety and health requirements for protection of workers exposed to noise;
- Government Decision no. 1048/2006 on the minimum requirements for personal protective equipment worn by workers, transposing Directive 89/656/CEE concerning the minimum safety and health requirements for using PPE by workers in the workplace;
- Government Decision no. 1051/2006 on the minimum requirements for health & safety of workers involved in manual handling of loads, transposing Directive 90/269/CEE concerning minimum safety and health requirements for manual handling of loads;
- Government Decision no. 1218/2006 on the minimum requirements for health & safety protection of employees exposed to hazards arisen from chemical agents, transposing Directive 98/24/CE concerning protection of health and safety of workers exposed to chemical agents in the workplace;

- Government Decision no. 355/2007 regarding workers health surveillance;
- Order no.427/2002 regarding minimal First Aid Kit inventory for workplaces without specialized medical assistance;
- Order no. 3/2007 regarding approval of template for Reporting of Lost-time Incidents;
- Order no. 242/2007 regarding nomination of H&S Coordinator during execution stage of projects using construction sites;
- Order no. 867/2007 regarding approval of Romanian standards list harmonized with European standards referring to pressurized equipment;
- Government Decision no. 557/2007 on the minimum requirements for health & safety protection of special types of employees (fixed term contract employees/ temporary employees hired via crewing agencies);
- Government Decision no. 300/2006 on the minimum health & safety requirements for temporary construction sites, transposed Directive 92/57/CEE concerning minimum health & safety requirements applicable to temporary or mobile construction sites;
- Government Emergency Decision no. 99/2000 regarding applicable control measures for health & safety protection of workers during periods of extreme weather conditions;
- Government Emergency Decision no. 96/2003 regarding protection of new and expectant mothers in the workplace, transposing Directive 92/85/CEE concerning protection of new or expectant mothers on the workplace;
- Government Decision no. 1876/2005 on the minimum health & safety protection of employees exposed to vibration, transposing Directive 2002/44/CE concerning minimum health and safety requirements applicable for workers exposed to risks generated by vibrations;
- Government Decision no. 115/2004 on establishing of essential PPE safety requirements and conditions for admittance on national market;

APPLICABLE INTERNATIONAL LEGISLATION AND PROTOCOLS

International Environmental and Social Policies and Standards

- Applicable EBRD Performance Requirements (PR)*, 2019, set out in the EBRD's Environmental and Social Policy:
    - PR 1: Assessment and Management of Environmental and Social Risks and Impacts;
    - PR 2: Labour and Working Conditions;
    - PR 3: Resource Efficiency and Pollution Prevention and Control;
    - PR 4: Health and Safety;
    - PR 5: Land Acquisition, Involuntary Resettlement and Economic Displacement;
    - PR 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources;
    - PR 8: Cultural Heritage; and
    - PR 10: Information Disclosure and Stakeholder Engagement.

    *PR7 refers to requirements linked to Indigenous Peoples, which are not present in Romania, thus is not applicable to the Project.

    *PR 9 refers to standards to be considered by financial intermediaries, thus is not applicable to the Project.

- Equator Principles IV (2020);
- International Financing Corporation (IFC), Performance Standards (PS) (2012);
- IFC Environmental, Health and Safety Guidelines for Wind Energy (2015);
- IFC Environmental, Health, and Safety Guidelines for Electric Power Transmission and Distribution (2007);
- World Bank Group, General Environmental, Health, and Safety Guidelines (2007);
- World Bank Group, Environmental, Health and Safety Guidelines for Wind Energy (2015);
- IFC/EBRD Guidance Note: Worker's Accommodation: Processes and Standards (2009);
- Voluntary Principles on Security and Human Rights.

International conventions and protocols

- The Kyoto Protocol on Climate Change (UNFCC)

  Romania became a signatory to the UNFCC in 1998 with a full ascension in 2002. This obligates Romania to assure that the future development in the country meets the conditions of the Convention.

  Relevant to the present Project are the requirements associated with the potential generation of greenhouse gas. Further conditions of relevance include:

  - Enhancement of energy efficiency in relevant sectors;
  - Protection and enhancement of sinks and reservoirs of greenhouse gases;
  - Promotion of sustainable forest management practices, afforestation and reforestation;
  - Promotion of sustainable forms of agriculture;
  - Implementation of measures to limit and/or reduce emissions of greenhouse gases; and
  - Limitation and/or reduction in methane emissions.

- The United Nations Convention on Biodiversity 1992

  This Convention seeks to conserve biodiversity and promote its sustainable use. It requires the identification and monitoring of the biodiversity in an area and adopting the necessary conservation measure. Romania become party to this Convention in 1994.

- The Basel Convention 1989

  This was developed under the auspices of the United Nations Environmental Programme (UNEP) in response to the growing worldwide awareness of the problem of international traffic in hazardous waste.

  The Basel Convention 1998 is the first and foremost global environmental treaty that strictly regulates the trans-boundary movement of hazardous wastes. It obligates parties to ensure environmentally sound management, especially during the disposal process.

  The objectives of the Convention are to:

  - Ensure that waste is disposed of as near as possible to the place or source of its generation;
  - Reduce trans-boundary waste and where it cannot be avoided, to be disposed of in an environmentally sound and efficient manner; and

- Provide assistance to developing countries in the management of hazardous waste and the generation.

- International Union for Conservation of Natural Resources Red List of Threatened Species

  The IUCN Red List, in 1994, was founded in order to provide a comprehensive inventory of the global conservation status of biological species, and to set of precise criteria to evaluate the extinction risk of thousands of species and subspecies. These criteria are applicable to all species and all regions of the world.

- Convention on the Conservation of European Wildlife and Natural Habitats, 1979, ratified by Law no. 13/1993 (Bern Convention);
- Convention on Conservation of Migratory Species of Wild Animals, 1979, ratified by Law no. 13/1998 (Bonn Convention);
- United Nations Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters 1998, ratified by Law no. 86/2000 (Aarhus Convention);
- European Convention on the Protection of the Archaeological Heritage, 1992, ratified by Law no. 150/1997 (La Valetta Convention);
- European Landscape Convention, 2000, ratified by Law no. 451/2002 (Florence Convention);
- The International Labour Organisation's Core Conventions;

ATTACHMENT 2: COMMITMENTS REGISTER