

ESAP

The keys for Status are listed below the table.

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status *
PR1	Assessment and Management of Environmental and Social Impacts and Issues						
1.1	Prepare and submit reports on status of ESAP implementation and environmental and social performance	<ul style="list-style-type: none"> > Monitor the implementation status of the ESAP > Comply with contractual & payment requirements and of the Bank 	EBRD PR 1	to be defined	In accordance with Loan agreement, but at least once a year as an attachment to AESR	Submission reports on environmental, occupational health and safety and social performance	NA
1.2	Appoint responsible manager for environmental issues	<ul style="list-style-type: none"> > Dedicated resource to manage environmental and social impacts > Global visibility on environmental and social aspects 	EBRD PR 1, clause 21	to be defined	2022	Increased awareness and understanding of the relevant issues throughout the Company staff. Completion of required reports and visible improvement in overall environmental performance. Progression in establishment of an environment management system	NA
1.3	Develop and implement an integrated	<ul style="list-style-type: none"> > Implement international best practice 	EBRD PR 1, Clause 15	to be defined	Q3, 2022 and on-going from therein	Environmental and social management system reports every six months outlining progress and	NA

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	<p>environmental, social management system (ESMS) for the Project including appropriate policies, procedures and documentation.</p> <p>The ESMS is to be developed and implemented based on ISO 14001 and ISO45001 international standards. Formal certification is not required. The ESMS to include:</p> <ul style="list-style-type: none"> ESMS policy – register of regulatory documents, permits, permissions, 	<p>> Implement a continuous improvement cycle based on the well-known Plan-Do-Check-Act model</p>				<p>planned activities</p>	

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	etc. <ul style="list-style-type: none"> ● ESMS objectives and targets ● ESMS programme ● Company description and location of facilities ● Roles and responsibilities ● Awareness and training ● Overall communication ● Checks and update ● Contractor overview, including license, registration, permits, OHS trainings 						
1.4	Establish corporate	> Ensure that	EBRD PR 1,	to be defined	Q4, 2022	Report on inspections, appointments	NA

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	policy and procedures for oversight of contractor environmental, occupational health and safety and social performance	EBRD requirements are cascaded to key contractors, who will have a leading role in defining the project and implementing it	Clause 20			etc. Contractor summaries (both at contractor level and compiled project level) in terms of environmental and occupational health and safety performance and summaries.	
1.5	Obtain all required permits for the project and comply with permit requirements	> Comply with national legislation	EBRD PR1, Local regulation and municipal structures	to be defined	Prior to construction and operation as applicable	Report on compliance in quarterly reporting outlined above. Provision of copies of required permits.	NA
PR2	Labour and Working Conditions						
2.1	Develop a human resources (HR) policy and occupational health and safety (OHS) policy. The HR policy should be gender inclusive and non-discriminatory and	> Communicate to all stakeholders the engagement of the company in terms of OHS and HR	EBRD PR 2, clause 6-12 International best practice	HR Department	Q1, 2023	Copy of the HR and OHS policy is presented, improvements identified and system developed	NA

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	aligned with EBRD PR 2 and the International Labour Organisation (ILO) Standards.						
2.2	Carry out gap analysis of existing labour safety management system and that of ISO45001	> This is a must-have input to action 1.3 of this ESAP	EBRD PR2	HR Department	Q1, 2023	Gaps identified and report presented	NA
2.3	Develop a human resources management plan, including associated procedures, relevant documentation and an employee grievance mechanism, in line with ILO standards and EBRD PR 2.	> Improve HR retention rate and reduce turnover > Define a bottom-up information process to obtain information about issues faced by employees	EBRD PR 2, clause 20	HR Department	Q1, 2023	Report annually on key staff data including dismissal, new hires, medical issues, accidents etc. Outline full breakdown of staff per business units, disciplines etc. Summary of changed or updated procedures	NA

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2.4	Provide training to relevant staff on labour safety management and how to prepare and operate a labour safety system taking into consideration local human resource and financial means	> Enable the implementation of the ESMS (action 1.3) ; training is key	EBRD PR2, PR4, Clause 13	HR Department	Q3 2022, but training and knowledge should be updated for all staff on an annual basis	Certificate of attendance – no member of staff should be allowed on a Company related construction site if they have not attended such a course	NA
2.5	Ensure contractors and sub-contractors implement the relevant environment, health and safety procedures as outlined above and in line with national, company and EBRD policy - Introduce an inspection system for both Company	> Provide visibility to management on the level of adherence of (sub)contractors to requirements and take necessary corrective actions	EBRD PR2, PR4, clause 12	To be defined	Once the above training is completed. On-going through construction period	Proven compliance with policy that is introduced with regards to environment, health and safety issues	NA

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	staff and contractors – “on the spot”						
2.6	Develop a labour safety management system with clear procedures, protocols and, above all, a concise action plan.	> As per action 1.3	EBRD PR 2 (cause 17), PR 4	Director General - HR Department	Q4, 2022	All employees are fully aware of the required measures. Clear plan is developed, training is provided	NA
2.7	Mitigate any adverse impacts associated with collective dismissals (planned redundancies), due to project automation.	> Increase project adoption by staff, local authorities and other stakeholders	EBRD PR 2 (clause 19)	Director General - HR Department	Q1, 2023	Measures of success: Retrenchment analysis is prepared and alternatives are analysed. If the analysis does not identify viable alternatives to retrenchment, a retrenchment plan is prepared. The plan must assess, reduce and mitigate the adverse impacts of retrenchment on workers, in line with national law and good international industry practice and based on the principles of non-discrimination and consultation. All stakeholders, including unions	NA

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						concerned (where they exist), workers and their representatives and, if appropriate, relevant public authorities, are informed on the change of employment conditions. All outstanding back pay and social security benefits and pension contributions and benefits are paid: (i) on or before termination of the working relationship to the workers; (ii) where appropriate, at a point in time agreed with the worker; or (iii) payment will be made in accordance with a timeline agreed through a collective agreement. Final retrenchment report is prepared.	
2.8	Prepare and implement a specific procedure for incident and accident investigation and the need for corrective actions. This will also extend to	> This is a key improvement lever for health and safety ; only transparent reporting of incidents and accidents and honest and deep investigations will allow to improve	EBRD PR 2	Technical Director	Prior to site clearance and construction works	Incident and accident investigation procedure in place and implemented. H&S statistics reported to EBRD as part of quarterly and annual reporting.	NA

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	contractors.						
2.9	Develop transparent grievance mechanism for employees and incorporate into HR policy	> See 2.3	EBRD PR 2 , international best practice	HR Department	2023	Grievance mechanism is developed and fully operational. Employees enabled to put forward opinions and complaints without feeling threatened	NA
PR3	Resource Efficiency and Pollution Prevention and Control						
3.1	Develop and implement mitigation plan, pollution and abatement measures in regards all emissions and potential pollutants in accordance with local permitting requirements and EU Best Available Technology / Environmental Quality Standards.	> Reduce adverse environmental impacts > Increase project acceptance	EBRD PR3, Clauses 8-9 International best practice, national regulations	Technical Director	Plan to be in place prior to construction, to be implemented throughout construction period and thereafter during operation	Quarterly reporting clearly identifying progress and tracking implementation. Submit reports to relevant authorities as required	NA

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3.2	Develop and implement environmental management plan for: <ul style="list-style-type: none"> ● Minimization of use of natural gas, electricity and other energy sources ● Noise control ● Minimization of water use ● Minimization and utilization of generation of hazardous and non-hazardous waste materials (including special provision for identification, handling and disposal of asbestos containing 	> Define practical expectation to manage identified priority environmental issues	EBRD PR3, Clauses 16-22	To be defined	Plan to be in place prior to construction, to be implemented throughout construction period and thereafter during operation	Bi annual management reports to be prepared. Environmental management plan to be reviewed and updated on an annual basis. Noise from the new wood chipper to be measured and reported, following EBRD requirements and international best practice	NA

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	materials)						
3.3	Develop and implement environmental monitoring plan	> Provide factual information to top management, Bank other stakeholders about the evolution of the environmental impacts of the company	EBRD PR3, international best practice, national regulations	To be defined	Plan to be in place prior to construction, to be implemented throughout construction period and thereafter during operation	Quarterly reporting illustrating monitoring of facilities during both construction and operation. Results of monitoring to be submitted to relevant authorities if compliance with standards, license or permits required	NA
3.4	Develop and update an emergency response plan to include measures for taking actions to prevent or reduce impacts on people or property that could be affected by unexpected failures or events	> Reduce risks to neighbouring communities	EBRD PR3, international best practice	To be defined	Prior to construction commencing	Any serious incidents quickly and swiftly dealt with. The plan should be reviewed and updated on a regular basis	NA

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3.5	Prepare policy to ensure that the supply chain ensures pollution and abatement control in their own activities in particular with regards biomass production	> Positively impact the local economical landscape to help them reduce their environmental impacts	EBRD PR3, international best practice	To be defined	Prior to signing of supply contracts	Suppliers of biomass implement the relevant pollution and abatement control measures – annual inspection of facilities of Company environmental manager	NA
3.6	Appoint responsible manager for environmental and occupational and safety issues – the company has appointed ecologist	> See 1.2	EBRD PR 4	To be defined	Q3, 2022	Increased awareness and understanding of the relevant issues throughout the Company staff. Completion of required reports and visible improvement in overall health and safety.	NA
3.7	Develop and enforce implementation by contractors of procedures to protect public	> Make sure that contractors manage and reduce their environmental and social risks > Increase project	EBRD PR 4, clause 17,18, 28, 29, 30	Technical Director	Prior to construction commencing, 2022, thereafter throughout	<ul style="list-style-type: none"> Traffic management plan is prepared Construction management 	NA

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	<p>health and safety. Procedures to include (but not to be limited to):</p> <ul style="list-style-type: none"> - Traffic management plan for contractors (speed limits, training, traffic routes, avoidance of sensitive areas) - Construction management plan to ensure that disruption to supply of heat and water and traffic caused by network upgrade is kept to an absolute minimum whilst also ensuring safe transport throughout the city during construction - Public notice of construction operations in areas 	acceptance			construction and operation	<p>plan is prepared</p> <ul style="list-style-type: none"> ● Public notices ● Adequate trained security in palace ● Physical barriers, signs etc in place e.g. “men at work”, high visibility barriers etc 	

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	<p>open to the public</p> <ul style="list-style-type: none"> - Security as needed to prevent unauthorized access to project locations, with appropriate training for security personnel - Hazard notices, signs, barriers etc to discourage/prevent access to dangerous areas 						
3.8	<p>Develop and update an emergency response plan to include measures for taking actions to prevent or reduce impacts on people or property that could be affected by unexpected</p>	> Increase project acceptance	EBRD PR4. Clause 35 International best practice	Technical Director	Prior to construction commencing, 2022	Plan is developed. The plan should be reviewed and updated on a regular basis	NA

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	failures or events						
3.9	Provide safe working conditions on site including <ul style="list-style-type: none"> - Risk assessment procedure - Procedures developed to manage each type of risk identified in the risk assessment (eg : managing electrical risk ; managing risks in excavation works...) - provision of the necessary safety 	> Clearly define expectations in terms of H&S > Define a tool to measure the level of implementation of those expectations	EBRD PR2, PR 4	To be defined	Prior to construction commencing	<ul style="list-style-type: none"> - Risk assessment results - Risk management procedures - List of available safety equipment, compliant with the EBRD requirements and international best practice Work site inspection results	NA

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	<p>equipment such as high visibility jackets, steel capped boots, hard hats, gloves etc</p> <p>Periodic inspections of work sites against established checklists</p>						
3.10	Training for new employees on environmental procedures	> Ensure new employees are aware of environmental requirements	EBRD PR2, PR 4	HR Department	Prior to construction commencing	Certificate of attendance – no member of staff should be allowed on a Company related construction site if they have not attended such a course.	NA
3.11	Training on environmental procedures when on a construction site for all staff	> Ensure staff is aware of environmental requirements on construction sites	EBRD PR2, PR 4	HR Department	Prior to construction commencing	Certificate of attendance – no member of staff should be allowed on a Company related construction site if they have not attended such a course	NA
3.12	Ensure contractors	> Define a tool to	EBRD PR2, PR	To be defined	Once the	Proven compliance with policy that is	NA

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	and sub-contractors implement the relevant environment, health and safety procedures as outlined above and in line with national, company and EBRD policy - Introduce an inspection system for both Company staff and contractors – “on the spot”.	measure the level of implementation of requirements communicated to contractors	4		above training is completed. On-going through construction period	introduced with regards to environment, health and safety issues.	
PR4	Health and Safety						
4.1	Appoint responsible manager for environmental and occupational and safety issues – the company has appointed	> Define a tool to measure the level of implementation of those expectations	EBRD PR 4	To be defined	Q3, 2022	Increased awareness and understanding of the relevant issues throughout the Company staff. Completion of required reports and visible improvement in overall health and safety	NA

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	ecologist						
4.2	Develop and enforce implementation by contractors of procedures to protect public health and safety. Procedures to include (but not to be limited to): - Traffic management plan for contractors (speed limits, training, traffic routes, avoidance of sensitive areas) - Construction management plan to ensure that disruption to supply of heat and water and traffic caused by network upgrade is kept to an absolute	See 3.7	EBRD PR 4, clause 17,18, 28, 29, 30	Technical Director	Prior to construction commencing, 2022, thereafter throughout construction and operation	<ul style="list-style-type: none"> ● Traffic management plan is prepared ● Construction management plan is prepared ● Public notices ● Adequate trained security in palace ● Physical barriers, signs etc in place e.g. “men at work”, high visibility barriers etc 	NA

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	minimum whilst also ensuring safe transport throughout the city during construction - Public notice of construction operations in areas open to the public - Security as needed to prevent unauthorized access to project locations, with appropriate training for security personnel - Hazard notices, signs, barriers etc to discourage/prevent access to dangerous areas						
4.3	Develop and update an emergency response plan to include measures	See 3.8	EBRD PR4. Clause 35 International best practice	Technical Director	Prior to construction commencing, 2022	Plan is developed. The plan should be reviewed and updated on a regular basis	NA

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	for taking actions to prevent or reduce impacts on people or property that could be affected by unexpected failures or events						
4.4	Provide safe working conditions on site including <ul style="list-style-type: none"> - Risk assessment procedure - Procedures developed to manage each type of risk identified in the risk assessment (eg : managing electrical risk ; managing risks in 	See 3.9	EBRD PR2, PR 4	To be defined	Prior to construction commencing	<ul style="list-style-type: none"> - Risk assessment results - Risk management procedures - List of available safety equipment, compliant with the EBRD requirements and international best practice - Work site inspection results 	NA

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	<ul style="list-style-type: none"> - excavation works...) - provision of the necessary safety equipment such as high visibility jackets, steel capped boots, hard hats, gloves etc - Periodic inspections of work sites against established checklists 						
4.5	Training for new employees on health and safety procedures	> Ensure new employees are aware of OHS requirements	EBRD PR2, PR 4	HR Department	Prior to construction commencing	Certificate of attendance – no member of staff should be allowed on a Company related	NA

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						construction site if they have not attended such a course.	
4.6	Training on health and safety procedures when on a construction site for all staff	> Ensure staff is aware of OHS requirements on construction sites	EBRD PR2, PR 4	HR Department	Prior to construction commencing	Certificate of attendance – no member of staff should be allowed on a Company related construction site if they have not attended such a course.	NA
4.7	Ensure contractors and sub-contractors implement the relevant environment, health and safety procedures as outlined above and in line with national, company and EBRD policy - Introduce an inspection system for both Company staff and contractors – “on the spot”.	See 3.12	EBRD PR2, PR 4	To be defined	Once the above training is completed. On-going through construction period	Proven compliance with policy that is introduced with regards to environment, health and safety issues.	NA

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PR5	Land Acquisition, Involuntary Resettlement and Economic Displacement: not applicable						
PR6	Biodiversity and Living Natural Resources: not applicable						
PR7	Indigenous People : not applicable						
PR8	Cultural Heritage						
8.1	Prepare and implement mitigation measures	Reduce risks to affect cultural heritage	EBRD PR8, clause 10	Technical Director	Prior construction, 2022	Mitigation measures are clearly outlined and prevention measures are exercised	NA
PR10	Information Disclosure and Stakeholder Engagement						
10.1	Develop and implement a stakeholder engagement plan, Update the Stakeholder Engagement Plan during lifecycle of the project	> Enhance project acceptance	EBRD PR10. Clause 11	HR department	2022 and to continue throughout development of the project	A stakeholder engagement plan has been developed as part of this project. During the construction and operational stages clear stakeholder actions must be taken, including announcements, notices and other appropriate measures complied	OT SEP defined

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						with Moldovan national regulations and EBRD requirements	
	Develop stakeholder grievance mechanism	<ul style="list-style-type: none"> > Enhance project acceptance > Improve the ESMS through the collection of grievances 	EBRD PR 10 Best practice	HR department	2022 and to continue throughout development of the project	Grievance mechanism is developed and fully operational	NA

*Status as per EBRD procedure :

Exceeding Target (ET):

The project has gone beyond the requirements of the defined ESAP target and evaluation criteria within the defined timeframe.

Achieved Target (AT):

The project has achieved the ESAP action targets and fulfilled the evaluation criteria within the defined timeframe.

On Target (OT):

The project is on target for achieving ESAP action targets and fulfilling the evaluation criteria within the defined timeframe.

Minor Delay (MD):

The project has not achieved the ESAP action targets within the defined timetable but has put systems, processes or mitigation measure in place, which are working towards addressing the deficiencies within a reasonable timeframe. In such case please specify the new target date.

Significant Delay (SD):

No significant progress has been made towards achieving the ESAP action targets within the defined timeframe. In such case please specify the new target date.

Not Applicable yet (NA):

The defined ESAP action is not applicable yet, e.g., if the project is currently at design stage and the defined ESAP action will be applicable only during the operational stage