

## Environmental and Social Action Plan

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
1.1	<p>Revise, update and implement the Project Operational Manual (for IFIs) and Project E&amp;S Management Framework (ESMF) in line EBRD PRs (2014) requirements.</p> <p>The update of the E&amp;S Framework as a minimum should address the requirements and assessments below, and in 1.3, and require that an explicit Bill of Quantities is established for E&amp;S requirements.</p> <p>This should cover environmental and social (E&amp;S) project management requirements including :</p> <ul style="list-style-type: none"> <li>• Review of E&amp;S risks and associated operational controls for individual road projects, including strategic assessments to justify investment projects.</li> <li>• Establish a process to provide</li> </ul>	<ul style="list-style-type: none"> <li>• Optimisation of environmental management through a formalised system</li> <li>• Compliance with EBRD's requirements</li> </ul>	<ul style="list-style-type: none"> <li>• EBRD PR<sub>1</sub> - Environmental and Social Management Systems</li> <li>• Best practice</li> </ul>	<p>ADF Internal resources Environment and Social Unit Addressed in detailed design preparation where appropriate</p>	<p>Prior to Project implementation</p>	<p>Project ESMS developed and implemented including ESMP template in use for all projects</p> <p>Roles and responsibilities for implementation of Project ESMS defined and clearly communicated to all workers</p> <p>Annual review of project ESMS by ADF</p> <p>Annual Monitoring Report submitted to EBRD by ADF</p>	

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
	<p>regular updates of national and EU Environmental acquis changes.</p> <ul style="list-style-type: none"> <li>• Define/Refine the standard methodologies to be used to assess environmental and social impacts.</li> <li>• Contractor management and monitoring, which needs to include checks on working conditions (wages, terms and conditions, overtime, provision of PPE and grievances)</li> <li>• Explicitly define the requirements within the framework and address in design process for: biodiversity assessments , visual impact assessments and air quality assessments in line with the EBRD PRs and good practice</li> <li>• Review Climate Change resilience including flood risk measures and undertake natural hazards risk assessments as part of the project preparation and detailed design process</li> </ul>						

OFFICIAL USE

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
	<ul style="list-style-type: none"> <li>• Adoption of ESMP document as part of contractor managements arrangements that address EBRD PRs.</li> <li>• Review requirements to update and disclose emergency preparedness and responses arrangements. Share with relevant parties such as police and other emergency services and the general public as appropriate.</li> <li>• Implementation and monitoring of ESMP and Environmental and Social Action Plan (ESAP)</li> <li>• Assign clear roles and responsibilities for implementation and reporting of stakeholder engagement</li> </ul>						
1.2	Provide an E&S Policy Statement and communicate to employees and other stakeholders.	<ul style="list-style-type: none"> <li>• Compliance with the EBRD's requirements</li> </ul>	<ul style="list-style-type: none"> <li>• EBRD PR<sub>1</sub> - Environmental and Social Policy</li> </ul>	Internal resources/ Environment and Social Unit Company's International Investment	Q2 2019	E &S Policy developed and implemented Roll out programme to staff and communication to broader stakeholders.	See PR 1

OFFICIAL USE

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
				Sector			
1.3	<p>Project ESMPs need to align with EBRD PRs, Project Biodiversity Management Plan (BMP) and must define the minimum monitoring and reporting requirements.</p> <p>Site specific ESMPs will contain provisions on, but not limited to plans and procedures for:</p> <ul style="list-style-type: none"> <li>- Air emission management</li> <li>- Noise and vibration management</li> <li>- Groundwater quality protection</li> <li>- Soil quality protection and management including stockpiles</li> <li>- Biological and ecological resources protection</li> <li>- Reinstatement and Landscaping Plan in line with the BMP requirements</li> <li>- Slope stabilisation Plans or method statements addressing safety and biodiversity requirements).</li> <li>- Waste management</li> <li>- Hazardous material</li> </ul>	<ul style="list-style-type: none"> <li>• Compliance with national regulatory and the EBRD's requirements</li> </ul>	<ul style="list-style-type: none"> <li>• EBRD PR1, PR2, PR3, PR4</li> <li>• Good international practice</li> <li>• Voluntary Principles on Security and Human Rights</li> </ul>	<p>ADF Internal resources Environment and Social Unit Supervising Engineer /PIU</p> <p>Contractors' internal resources/Contractor</p>	<p>During signing of contract with Contractor to be engaged in construction works (Contractors' contractual obligations)</p>	<p>Project ESMP and Biodiversity Offsets strategy submitted to EBRD</p> <p>ESMP and supporting plans approved by Supervising Engineer /ADF prior to works commencing</p> <p>Implementation of relevant EBRD PR requirements</p> <p>Request on development of site-specific ESMPs incorporated into contracts with Contractor</p> <p>Included in Annual Monitoring Report submitted to EBRD</p> <p>Evidence of ESMPs</p> <p>Appropriate mitigation measures implemented by the Company and Contractor</p>	

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
	<ul style="list-style-type: none"> <li>Management</li> <li>- Resource efficiency</li> <li>- Climate change resilience measures (flood risk assessment, adequate drainage system capacity to deal with intense rainfall events)</li> <li>- Spill/incident/ accident response and management</li> <li>- Labour, working conditions and welfare requirements including a code of conduct for workers (including with gender-sensitive measures)</li> <li>- Grievance management for workers and external stakeholders.</li> <li>- Worker accommodation (in accordance with the provisions of PR 2 with regards to worker accommodation and the EBRD/IFC Guidance Note "Workers' accommodation: processes and standards"</li> </ul>						

OFFICIAL USE

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
	2009 referred to in PR 2) – Security personnel requirements ((in accordance with the provisions of PR 2) <sup>1</sup> – Information disclosure and stakeholder engagement – Occupational health and safety (OHS) measures – Community health and safety measures including a community H&S risk assessment – Emergency plans – Chance Find Procedures – Induction training – as a minimum this should include EHS, grievance mechanism, gender-based violence, and biodiversity training for all workers on site. – Biodiversity offset strategy and implementation programme						
1.4	ADF to undertake an EBRD PR	<ul style="list-style-type: none"> <li>• Compliance with</li> </ul>	<ul style="list-style-type: none"> <li>• EBRD PRs</li> </ul>	ADF Internal	Q2 2020	Training needs	

<sup>1</sup> The ESMP should include a standard of practice and behaviour for such personnel in terms of: hiring (making reasonable inquiries that such personnel is not implicated in past abuses), rules of conduct (require such personnel to act within the applicable law), training (ensure such personnel is trained adequately in use of force and appropriate conduct), equipping and monitoring of such personnel, establishing and maintaining an effective grievance mechanism to allow the affected community and workers to express concerns about security arrangements and actions of security personnel).

OFFICIAL USE

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
	E&S training needs analysis to identify specific training needs, prepare a training plan and implement.	EBRD's requirements		resources Environment and Social Unit	(training needs analysis) Q4 2020 complete training programme	Training plan and dedicate budget Training records	
1.5	Obtain all permits and authorisation prior to the commencement of works	<ul style="list-style-type: none"> <li>Compliance with National Law and EBRD requirements</li> </ul>	<ul style="list-style-type: none"> <li>EBRD PRs</li> </ul>	Internal resources Environment and Social Unit Contractors	Prior to works	Register of permits	
1.6	ADF and contractors to adopt a change management procedure to assess the EHS and labour risks of any design or changes to works	<ul style="list-style-type: none"> <li>Compliance with National Law and EBRD requirements</li> </ul>	<ul style="list-style-type: none"> <li>EBRD PRs</li> </ul>	Internal resources Environment and Social Unit Supervising Engineer/PIU Contractors	Prior to works commencing	Procedure SE /PIU approval of changes.	
2.1	Incorporate PR 2 provisions related to worker organisations within the update of the ADF Operational Manual	<ul style="list-style-type: none"> <li>Compliance with National Law and EBRD's requirements</li> </ul>	<ul style="list-style-type: none"> <li>EBRD PR 2</li> </ul>	Internal resources – HR Department	Q2 2020	Updated Operations manual	
2.2	Formalise and communicate to all employees the internal grievance procedure for workplace concerns in accordance with PR2. Grievance procedure to be	<ul style="list-style-type: none"> <li>Compliance with the EBRD's requirements</li> </ul>	<ul style="list-style-type: none"> <li>EBRD PR2 – Grievance mechanism</li> <li>EBRD Guidance Note on Grievance</li> </ul>	ADF Internal resources/ HR Contractors	Prior to Project implementation	Process and number for tracking grievances included in Annual Monitoring Report submitted to EBRD	

OFFICIAL USE

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
	communicated and available for use by all workers on site including contractors.		Management			Evidence of communication of grievance mechanism to workers Contractors induction training	
2.3	Require Contractors to apply the relevant requirements of PR2 (human resources policies, working relationships, child labour, forced labour, non-discrimination and equal opportunity, workers' organisations, wages, benefits and conditions of work, occupational health and safety, worker accommodation, grievance mechanism, security personnel trained in Voluntary Principles on Security & Human Rights ) through contractual agreements and ADF to periodically check implementation of such requirements.	<ul style="list-style-type: none"> <li>Compliance with the EBRD's requirements</li> </ul>	<ul style="list-style-type: none"> <li>EBRD PR2 – Non-employee workers</li> </ul>	Contractor's internal resources	During signing of contract with Contractor to be engaged in construction works	Provisions on applying the relevant requirements of PR2 incorporated into contracts with Contractor Periodic checks and reports on contractors by ADF Included in Annual Monitoring Report submitted to EBRD	
2.4	Client and contractors to promote equal opportunities-related policies and practices to further women's inclusion in accordance with EBRD PR 2,	<ul style="list-style-type: none"> <li>Compliance with the EBRD requirements</li> </ul>	<ul style="list-style-type: none"> <li>EBRD PR2 – Equal opportunities</li> </ul>	Internal Resources Contractors	During signing of contract with Contractor to be engaged in construction		

OFFICIAL USE

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
	with a focus on the prevention and mitigation of all forms of gender-based violence and harassment on site and around the Project's area.				works		
3.1	Contractor to undertake pre-construction baseline for noise, air quality, water quality, soil conditions and biodiversity checks prior to works commencing.	Compliance with EBRD requirements	EBRD PR 3 and PR 6	Contractor  Supervising Engineer/PIU to review and approve.	Project preparation and prior to works on site	Preconstruction report with analysis of baseline and amendments to project specific mitigation if required.	
4.1	Appoint a professional responsible for occupational health and safety (OHS) within the ADF E&S unit to update ADF manuals and guidance documents (including contractors) to align with PR4 . The OHS professional will develop and implement an audit schedule to carry out periodic independent checks on OHS at project site works.	Compliance with the EBRD's requirements	EBRD PR 4 - Occupational Health and Safety	Internal resources/PIU	Prior to Project implementation (during the Project preparation phase)	Implementation of OHS management Site visit reports and follow up actions undertaken. Included in Annual Monitoring Report submitted to EBRD	
4.2	ADF to contractually require Contractors to develop and implement Traffic and Road Safety Management Plans for Project sections under construction covering both	Compliance with the national and the EBRD's requirements	EBRD PR 4 - Traffic and Road Safety	Contractors' internal resources	During signing of contract with Contractor to be engaged in construction works	Implementation of the Project Traffic and Road Safety Management Plans Included in Annual Monitoring Report submitted to EBRD	

OFFICIAL USE

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
	<p>community and occupational road risks.</p> <p>Such Plans will include provisions on, but not limited to:</p> <ul style="list-style-type: none"> <li>vehicle inspections,</li> <li>occupational road risk measures</li> <li>driving policy,</li> <li>pedestrian control,</li> <li>delivery routes</li> <li>signage</li> <li>public information policies</li> <li>agreed access routes</li> </ul> <p>Construction vehicles to keep to agreed access routes and adhere to construction speed limits;</p> <p>Ensure the competency of vehicle operators and provide induction training;</p> <p>Minimise the need for vehicle reversing</p> <p>Provide segregated routes and site entrances (i.e. with no vehicles) to be provided for pedestrians;</p> <p>Information boards about public safety hazards and emergency</p>				(Contractors' contractual obligations)	<p>Road safety initiatives</p> <p>Accident data</p>	

OFFICIAL USE

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
	contact information, schedules; Establish temporary diversions for the local access routes.						
4.3	<p>All detailed designs will be subject to a Road Safety Audit under National Law and in accordance with the provisions of EU Directive 2008/96/EC, with mandatory inclusion of technical and economically feasible and cost-effective road safety improvements into the design phase.</p> <p>Where the Road Safety Auditor's recommendations are not implemented, the reason why each recommendation has been declined will be reported to the Bank. The responses will need to be made to the Bank prior to the detailed design being approved by the relevant state expertise.</p>	Compliance with the EBRD's requirements	EBRD PR 4	Internal resources/ Design consultant	During design stage and during operation	<p>Evidence on conducted Road Safety Audits</p> <p>Compilation of accident statistics</p> <p>Included in Annual Monitoring Report submitted to EBRD</p>	
5.1	Review and update the Resettlement Policy Framework to align with PR 5, and prepare and implement Resettlement / Livelihood Restoration Plans for	Compliance with the national regulatory and the EBRD's requirements	<p>Albanian expropriation requirements</p> <p>EBRD PR5 - Land</p>	Internal resources/ Environment and Social Unit	Q1 2020	<p>Updated Project RPF to be provided to EBRD.</p> <p>RAPs / LRPs to be submitted to EBRD on a non objection basis.</p>	

OFFICIAL USE

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
	the Project.		acquisition, involuntary resettlement and economic displacement			Annual Monitoring Report submitted to EBRD	
6.1	Incorporate requirements specified in the Biodiversity Management Plan into the Project ESMP, in line with PR 6 requirements. and ADF to provide a Biodiversity offset strategy and implementation programme	Compliance with the national and the EBRD's requirements Minimising risks to biodiversity	EBRD PR 6 - Assessment of Biodiversity and Living Natural Resources EBRD PR 6 - Conservation of Biodiversity	Internal resources/ Company's Environment and Social Unit  Contractors' internal resources / Contractor	During the Project preparation phase Offset strategy by Q2 2020	Implementation of the biodiversity and conservation protective measures prescribed in the Environmental Permit and Biodiversity Assessment  Biodiversity offsets programme to be agreed with EBRD.  Monitoring Reports submitted to EBRD	
6.2	Appoint an Ecologist Clerk of works to undertake pre-construction checks, over see the implementation of the BMP requirements and provide monthly reports to ADF	Compliance with the national and the EBRD's requirements Minimising risks to biodiversity	EBRD PR 6 - Conservation of Biodiversity	Contractors' internal resources / Contractor Supervising Engineer	During the Project preparation phase	Implementation of the biodiversity and conservation protective measures prescribed in the Environmental Permit and Biodiversity Management Plan.  Monitoring Reports submitted to EBRD	
6.3	Provide animal crossing point in line with the recommendation in the BMP for the protection of	Compliance with the national and the EBRD's	EBRD PR 6 - Conservation of	Contractors' internal resources /	Detailed design to address	Implementation of the biodiversity and conservation protective	

OFFICIAL USE

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
	the Jackal and implement associated monitoring programme during construction and operations.	requirements Minimising risks to biodiversity	Biodiversity	Contractor Supervising Engineer Internal resources/ Environment and Social Unit to over sea and monitor.	Construction and Operations	measures prescribed in the Environmental Permit and Biodiversity Management Plan. Monitoring Reports submitted to EBRD	
8.1	Develop Chance Find Procedure in compliance with PR 8, and share with Contractor.  Ensure relevant staff and Contractors are trained in its requirements and consultations with affected communities and other relevant stakeholders are undertaken when relevant.	Compliance with the national regulatory and the EBRD's requirements Minimising risks to cultural heritage	Local legislation in force pertaining to protection of cultural heritage EBRD PR 8 – Cultural Heritage	Internal resources/ Environment and Social Unit Contractor	Prior to construction and during construction phase	Chance Find Procedure developed and relevant Company/Contractor staff trained Consultations undertaken when relevant Consents obtained from relevant authorities for protection of cultural heritage Annual Monitoring Report submitted to EBRD	
10.1	Implement and monitor the Stakeholder Engagement Plan (SEP) for each road section in compliance with PR 10, and require from the Contractors to implement stakeholder	Management of risks and impacts on affected communities Compliance with	EBRD PR10 - Information disclosure and stakeholder engagement	Internal resources / Environment and Social Unit	Continuously	Included in Annual Monitoring Report submitted to EBRD Monitoring reports for grievances received and	

OFFICIAL USE

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
	engagement requirements as set out in the SEP and in particular the use of the grievance mechanism.	the EBRD's requirements	UNECE Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters			follow up action taken.	
10.2	ADF to support the implementation of the Ecotourism Technical Co-operation project and the promote Sustainable/Eco Tourism Programme and assist in the promotion of the Liaison /Working Group to enable it to be self- sustaining.	Compliance with the EBRD's requirements	EBRD PR10 - Information disclosure and stakeholder engagement  EBRD PR 1, 2, 4, 6, 10	Internal resources / Environment and Social Unit  EBRD Technical Co-operation Fund	Project preparation and implementation	Implementation of the TC Stakeholder Engagement activities and training materials	

**Reviewer**  
**Environmental and Social Unit**  
**Albanian Development Fund**

Signature

Nertis Mero and Genti Cupi



**Project Manager**  
**Albanian Development Fund**

Signature

Ermir Omari



**Projects Manager Unit for**  
**Road Infrastructure Interventions**  
**Albanian Development Fund**

Signature

Dritan Mehdi Agolli



**Director of Infrastructure Department**  
**Albanian Development Fund**

Signature

Arben Skenderi

