

EBRD Environmental and Social Action Plan

No.	Environmental & Social Action	E&S Risks/ Benefits	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibilities	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
PR1	Assessment and Management of Environmental and Social (E&S) Impacts and Issues						
1.1	<p>Ensure that Requirements from the national Environmental Impact Assessment (EIA), Ecological Permit and this ESAP are included in Tender Documents:</p> <p>RSM will ensure that the Tender Documents prepared for the Project include the following:</p> <ul style="list-style-type: none"> All requirements of the EIA, and the Ecological Permit which apply to this Project, as well as the requirements of this ESAP, the Stakeholder Engagement Plan (SEP), and the Land Acquisition and Resettlement Framework (LARF) and subsequent Land Acquisition and Resettlement Plan (LARP). A clear requirement for the Contractor to develop a full Construction Environmental & Social Management Plan (CESMP) which includes the following: Site Management Plan, Borrow Management Plan, Spoil Management Plan (which details the expected volumes and locations of spoil generation, planned locations and methods for storage and disposal, and mitigation methods and procedures to be followed), Waste Management Plan, Wastewater Management Plan, Materials Management Plan, Health and Safety Plans (Community & Worker), Traffic Management Plan, Social Management Plan, Emergency Preparedness & Response Plan, Biodiversity Management Plan, and a Method Statement for Working in and close to Watercourses (setting out how the river flow will be maintained during the works, how water quality will be protected, and including an approach to maintenance of plant and machinery taking into account the requirements to avoid pollution to the ground and watercourses). All EBRD's E&S requirements for construction projects, including reporting requirements and PR2 and PR4 clauses within the EBRD Standard Tender Document for Works. A change management process whereby any changes or design proposals from the Contractor are adequately reviewed and assessed by the Engineer (and RSM) for environmental and social implications, and any additional mitigation measures identified and applied. A requirement that the Engineer and Contractor agree the specific Construction phase monitoring programme, based on the Ecological Permit, and agree specific monitoring locations for all parameters. 	<p>All construction-related environmental and social issues and impacts are appropriately addressed.</p> <p>Compliance with EBRD Performance Requirements</p>	<p>PR1: Assessment and Management of Environmental and Social Impacts and Issues.</p> <p>PR2: Labour & Working Conditions.</p> <p>PR3: Resource Efficiency and Pollution Prevention and Control.</p> <p>PR4: Health & Safety.</p> <p>PR6: Biodiversity Conservation and Sustainable Management of Living Resources.</p>	<p><i>Responsibility:</i> RSM.</p> <p><i>Resources:</i> In house (RSM).</p>	<p>Tender Documents to be prepared and issued in accordance with RSM's Project schedule.</p> <p>Engineer to be procured to begin in parallel with design-and-build contract.</p>	<p>Tender Documents containing all specified requirements, available for review by EBRD.</p> <p>Supervising Engineer to have reviewed and approved that plans meet EBRD PRs or Good International Practice (GIP) where appropriate.</p> <p>CESMP implementation supervised by Engineer.</p> <p>Monthly reports to RSM from Engineer during construction.</p> <p>Annual AESR Report to EBRD.</p>	
1.2	<p>Ensure that Information on the Project Status is available to River Bosnia Regulation Project (RBRP)</p> <p>RSM to contact the agency responsible for the RBRP and ensure that if the Project development is restarted, RSM will be informed. RSM will then provide all updated information on the Roads Project to RBRP, including as built drawings, and any updated flood studies.</p>	<p>Possible cumulative effects related to the RBRP are understood and addressed.</p>	<p>PR1: Assessment and Management of Environmental and Social Impacts and Issues.</p>	<p><i>Responsibility:</i> RSM.</p> <p><i>Resources:</i> In house (RSM).</p>	<p>During Tender process, so RBRP is informed of Project implementation status.</p>	<p>Note of communication with RBRP, and contact details.</p>	

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1.3	<p>Establish an Environmental and Social Management System (ESMS)</p> <p>RSM to continue to develop its ESMS system, in line with ISO14001 or other internationally recognised standard and in line with the guidance contained in ISO26001. RSM to bring together the various components in place now such as procedures based on RS Rulebooks to form a more integrated management system. The ESMS should cover all aspects of RSM’s operations, including roads construction, operation, and its own internal institutional operations.</p> <p>The system will include:</p> <ul style="list-style-type: none"> • Policy; • Objectives, targets; • Identification of legal and other requirements; • Risk assessments of activities (inclusive of all EHSS topics); • Procedures and operational controls to minimise impacts; • Training and communication; • Monitoring of performance; • Internal reviews and audits; and • Management reviews. <p>The ESMS should include an annual review of systems and procedures, including emergency response procedures, to determine whether any updates are needed. It will also include more frequent reviews as needed in response to any EHSS incidents.</p>	Optimisation of environmental management through a harmonised / integrated system.	PR1: Assessment and Management of Environmental and Social Impacts and Issues.	<p><i>Responsibility:</i> RSM.</p> <p><i>Resources:</i> In house, may need to identify small budget.</p>	To be agreed with EBRD. Ideally, by the time of commissioning the new road.	ESMS documentation, including provisions for and results of monitoring related to the Project implementation.	
1.4	<p>Operational Environmental and Social Management Plan (OESMP): RSM to develop and implement an OESMP for the Project to include management and monitoring actions for road operation as required in the EIA, the Ecological Permit, by EBRD (including road safety), in the ESAP, and from the Contractor’s recommendations. This should also address the responsibility for implementation and supervision of OESMP actions. This OESMP should be costed so that an annual budget can be established.</p>	E&S risks during road operation.	PR1: Assessment and Management of Environmental and Social Impacts and Issues.	<p><i>Responsibility:</i> RSM.</p> <p><i>Resources:</i> RSM to budget for ongoing OESMP and monitoring actions.</p>	OESMP to be developed prior to commencement of operation of the road.	<p>OESMP document available before operation begins.</p> <p>Supervising Engineer to have reviewed and approved that plans meet EBRD PRs or GIP where appropriate.</p> <p>Annual AESR Report to EBRD on road operation.</p>	
PR2	Labour and Working Conditions						
2.1	<p>HR Policies: RSM to require construction Contractor to prepare and implement an HR Policy, including provisions to prohibit use of child labour and forced labour and provisions for worker grievances.</p>	Effective and improved HR & workforce management.	PR2: Labour and Working Conditions.	<p><i>Responsibility:</i> RSM to develop requirements in Tender, Contractor responsible to implement during Construction.</p>	Prior to construction commencing	HR Policies in place and approved by Supervising Engineer.	

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				<i>Resources:</i> Contractor.			
2.2	<p>Use of Local Workforce: Tender Documents to require Contractor to produce a HR Policy which includes a policy of i) advertising all jobs locally, ii) of encouraging and attracting local workforce (including women) to apply for jobs, and iii) of prioritising the hire of local workforce where reasonable and practical, including women and people affected by the Project Land Acquisition and Resettlement process who have received training for employment (see PR5 actions below), where possible.</p> <p>Contractor to implement policy.</p>	Local economic benefits and restoration of livelihood affected by displacement due to the Project	PR2: Labour and Working Conditions. Good practice.	<p><i>Responsibility:</i> RSM to develop requirements, Contractor responsible to implement during Construction.</p> <p><i>Resources:</i> Contractor</p>	Prior to finalisation of Tender Documents.	<p>Appropriate sections on labour and workforce provisions in revised Tender Documents.</p> <p>Local employment during construction should be recorded by Contractor and submitted to Supervising Engineer.</p> <p>Include in annual AESR report to EBRD.</p>	
2.3	<p>Workforce Conduct/General Management: Contractor will implement measures to manage potential impacts of influx of workers into the local area, including general measures, health surveillance, code of conduct for workers, etc. – this shall be proportional to the numbers of workers required by the Project.</p>	Effective workforce management.	PR2: Labour and Working Conditions. PR4: Health & Safety.	<p><i>Responsibility:</i> RSM to develop requirements in Tender, Contractor responsible to implement during Construction.</p> <p><i>Resources:</i> Contractor.</p>	Measures outlined within CESMP prior to construction and implemented throughout construction.	Measures outlined in CESMP.	
2.4	<p>Siting of Worker Accommodation: If dedicated worker camps have to be established these will be located appropriately and avoid sensitive areas. Consultation will be undertaken by the Contractor with the relevant authorities to identify appropriate locations and minimise disturbance to local communities. Engagement with local communities where worker accommodation is proposed should be undertaken and clear contact details for dealing with any issues arising provided by the Contractor to the local communities.</p>	Minimising disturbance to local communities.	PR2: Labour and Working Conditions.	<p><i>Responsibility:</i> RSM to develop requirements, Contractor responsible to implement during Construction.</p> <p><i>Resources:</i> Contractor.</p>	Prior to agreements over temporary land to locate worker accommodation.	Consultation complete and no complaints regarding operation of worker camps.	
2.5	<p>Health & Safety of Workers and Disease Control: Contractor shall undertake appropriate measures to reduce the risk of transfer of STDs and HIV/AIDS among the Contractor’s Personnel and the local community including providing condoms and information for raising awareness among employees of sexually transmitted disease and HIV/AIDS.</p> <p>Contractor to ensure sufficient provision of medical care facilities and resources for workforce.</p>	Management of health risks to workers and community health.	PR2: Labour and Working Conditions. PR 4: Health & Safety.	<p><i>Responsibility:</i> RSM to develop requirements in Tender, Contractor responsible to implement during Construction.</p> <p><i>Resources:</i> Contractor.</p>	Clause needs to be in Tender Documents prior to their issue.	<p>Tender document updated with EBRD requirements.</p> <p>Measures outlined in CESMP.</p>	

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PR3 Resource Efficiency and Pollution Prevention and Control							
3.1	<p>Noise Barriers</p> <p>RSM shall ensure that the exact locations where noise barriers are required are identified, and that sufficient details on these are included in the Tender Documents. The EIA for Project 1 requires barriers at four specific locations. These may be specified either in the Tender Documents, or by the Contractor, with the agreement of the Engineer and RSM. Communities close to where noise barriers will be installed should be notified in advance.</p>	All RSM's E&S risks are appropriately addressed and actions tracked.	<p>PR3: Resource Efficiency and Pollution Prevention and Control.</p> <p>RS Rulebook on allowed sound intensity and noise levels, 1989.</p>	<p><i>Responsibility:</i> RSM.</p> <p><i>Resources:</i> Once specified, will be part of Project cost proposed by Contractor.</p>	To be determined before Tender Documents agreed, unless part of design and build Contractor's output.	Map/drawings with sufficient design detail for these to be costed and erected.	
3.2	<p>Flood Studies</p> <p>RSM to engage experts to review the flood studies done in 2010, in the light of the information from the 2014 flood. This should be done in conjunction with the river basin authority. RSM to ensure that the scheme designs are reviewed, and revised where necessary, based on the updated flood studies.</p>	<p>Risks to Project infrastructure from flooding.</p> <p>Risks to nearby environment from Project-related flooding.</p>	<p>PR3: Resource Efficiency and Pollution Prevention and Control.</p>	<p><i>Responsibility:</i> RSM.</p> <p><i>Resources:</i> Once specified, will be part of Project cost proposed by Contractor.</p>	Urgent. Revised flood studies (or confirmation that current ones remain relevant) and design revisions (if necessary) needed before Tender Documents finalised.	<p>Revised flood studies reports approved by relevant stakeholders, including river basin authority.</p> <p>These should also be reviewed by EBRD.</p>	
3.3	<p>Environmental Monitoring and Compliance</p> <p>Environmental monitoring of water quality, air quality and noise parameters is already a requirement in the Ecological Permit, but where the environmental limits required in the EU <i>aquis</i> are more stringent than in RS, the EU requirements should be met.</p>	Compliance with internationally accepted environmental standards.	<p>PR3: Resource Efficiency and Pollution Prevention and Control.</p>	<p><i>Responsibility:</i> RSM.</p> <p><i>Resources:</i> For construction monitoring, costs will be borne by Contractor. For operation, costs met from RSM's ongoing operations monitoring budget.</p>	During construction and operation phases. Construction phase requirement to be included in tender documents.	<p>Reported in Contractors monitoring programme, via Supervising Engineer (for construction), and in RSM's annual submission to Pollution Register.</p> <p>Included in annual AESR report to EBRD.</p>	
PR4 Health and Safety							
4.1	<p>Occupational Health & Safety Plan (OHS) During Construction: Contractor will establish a Health and Safety Plan as part of an OHS management system in accordance</p>	Improved health and	PR4: Health & Safety.	<p><i>Responsibility:</i> Contractor.</p>	Plan must be approved by	Documented Health & Safety Plan -	

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	with OHSAS 18001 or other international standard. The contractual conditions of the Contractor are to ensure that all sub-contractors are also required to follow the Contractor's Health & Safety Plan and the OHS management system.	safety performance and a safe working environment for workforce.		Review by Supervised Engineer. <i>Resources:</i> Contractor – Designated OHS Manager.	the Supervising Engineer before construction. Implemented during the construction phase.	ongoing health & Safety statistics and data. Provide updates to RSM on implementation and statistics to EBRD.	
4.2	Occupational Health & Safety Plan During Operation: RSM (maintenance division) will establish a Health and Safety Plan as part of an OHS management system for the maintenance of the Project road in accordance with OHSAS 18001 or other international standard.	Improved health and safety performance and a safe working environment.	PR4: Health & Safety.	<i>Responsibility:</i> RSM. <i>Resources:</i> RSM & contractors.	Plan must be submitted to EBRD prior to operation of the road. Implemented during the operation of the road.	Documented Health & Safety Plan - ongoing health & Safety statistics and data. Provide updates to RSM on implementation and statistics to EBRD.	
4.3	Road Safety Audit (RSA): A Road Safety Audit in line with EU Directive 2008/906/EC (and relevant aspects of RS legislation and standards) to be carried out by an independent appropriately certified auditor on the detailed design which should then be updated for the findings of the RSA. This RSA will include, but not be limited to, a review of the following issue: <ul style="list-style-type: none"> Fencing at specific locations: There are locations where the new Project road will run in close proximity to existing communities and may increase the risk of people directly crossing the new motorway at these locations, e.g. where the road runs particularly close to houses near Kamenjani (in the village of Kostajnica) and in the village of Grapska Gorna, where the road and bridge approaches runs close to individual households on the floodplain, and also where it runs close to field tracks or crossing points which may be used for local access. A review of whether fencing should be installed to reduce these risks will be carried out as part of the RSA. Following the RSA there should be the mandatory inclusion of economically viable improvements into the design. Where the RSA recommendations are not implemented, the reasons why each recommendation has been declined needs to be confirmed to EBRD. A road safety inspection shall be carried out on the road once operational, and if appropriate action plans developed for low cost remedial road safety measures.	Reduction of accident risks and improved road and community safety.	PR4: Health & Safety.	<i>Responsibility:</i> RSM to procure Consultant. <i>Resources:</i> RSM to cover consultant costs.	Before finalisation of the detailed design for tendering and subsequent RSAs at key stages, as required under the EU Directive 2008/96/EC.	Documented RSA. Updated detailed design & Tender Documents. Report in AESR to EBRD.	
4.4	Traffic Management Plan (& Community H&S Measures in CESMP): Contractor to include relevant Community Health & Safety measures within the CESMP and the Traffic Management Plan (TMP). Haulage routes - avoiding communities as far as	Compliance with EBRD requirements	PR4: Health & Safety.	<i>Responsibility:</i> Contractor. Review by Supervised	TMP & CESMP must be submitted	Documented TMP & CESMP - ongoing accident statistics	

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	<p>possible - should be considered in the TMP. Drivers should be trained in safe driving and the code of conduct. The TMP will need to consider phasing of the works to ensure local access is retained, including public transport. The management of mixed traffic during construction needs to be reinforced in the TMP especially due to the predominant agricultural land use in the area, including the potential management of livestock movements and peaks of agricultural machinery and need for frequent access during harvest times.</p> <p>Contractor will be expected to monitor potential traffic and road safety risks (including accidents) within the 'Works' area as part of their Traffic Management Plan.</p>	on health & safety and to ensure health & safety, access and severance issues are minimised for the local communities and agricultural land users.		<p>Engineer.</p> <p><i>Resources:</i> Contractor – Designated OHS Manager.</p>	<p>and approved by the Supervising Engineer before construction commences.</p> <p>Implemented during the construction phase.</p>	<p>and data.</p> <p>Provide updates to RSM on implementation and statistics to EBRD.</p>	
4.5	<p>Measures to Exclude the Public from Entering the Works Site: During the CESMP preparation and works planning, the Contractor will identify measures to discourage public access to the works site, especially at locations close to communities, e.g. where the road passes close to Kamenjani (in the village of Kostajnica), and the village of Grapska Gorna. The provision of temporary fencing at specific locations should be considered where the risk of public access may be increased (e.g. where works run close to local communities etc.).</p>	Compliance with EBRD requirements on health & safety.	PR4: Health & Safety.	<p><i>Responsibility:</i> Contractor.</p> <p>Review by Supervised Engineer.</p> <p><i>Resources:</i> Contractor – Designated OHS Manager.</p>	<p>CESMP must be approved by the Supervising Engineer before construction.</p> <p>Implemented during the construction phase.</p>	Documented CESMP.	
4.6	<p>Community & Staff Road Safety Awareness</p> <p>RSM will, prior to opening of the Project road, arrange and deliver Community Road Safety Awareness raising activities to the local communities to discourage:</p> <ul style="list-style-type: none"> • direct crossing of the Project road. • taking direct access onto the new road with agricultural/other vehicles/livestock. • generally raise awareness amongst the community and staff of safe driving practices including use of seat belts and phones whilst driving. 	Compliance with EBRD requirements on health & safety.	PR4: Health & Safety.	<p><i>Responsibility:</i> RSM.</p> <p><i>Resources:</i> RSM.</p>	<p>During the construction period and prior to opening of Project road and/or project road sections.</p>	<p>Programme of Community & Staff Road Safety Awareness activities defined and delivered.</p> <p>Provide updates to EBRD.</p>	
PR5	Land Acquisition, Involuntary Resettlement and Economic Displacement						
5.1	<p>Preparation & Implementation of Land Acquisition & Resettlement Plan (LARP):</p> <p>Complete the preparation and implementation of the Land Acquisition & Resettlement Plan in line with the <i>Law on Expropriation of RS¹</i> and EBRD's PR5. The Project LARF will be used as the basis for the development of the LARP, including implementing the actions required in the LARF with respect to additional engagement of Project Affected</p>	Compliance with EBRD and national requirements ..	PR5: Land Acquisition, Involuntary Resettlement & Economic Displacement.	<p><i>Responsibility:</i> RSM.</p> <p><i>Resources:</i> RSM.</p>	<p>Before construction starts.</p>	<p>Submit LARP to EBRD for review when prepared.</p> <p>Documented and implemented LARP.</p>	

¹ Official Gazette of RS, No. 112/06, 37/07, 66/08, 110/08, 106/10, 121/10, 2/15, 79/15

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	Peoples.					Report progress in AESR to EBRD.	
5.2	Land Acquisition & Resettlement Consultation Materials: Consultation materials, such as pamphlets and posters on the expropriation process, including Land Acquisition & Resettlement (LARF) / LARP, and information on the Grievance Mechanism for the Project need to be prepared to support the consultation with affected persons. These should be available in Serbian.	Compliance with EBRD and national requirements ..	PR5: Land Acquisition, Involuntary Resettlement & Economic Displacement.	<i>Responsibility:</i> RSM. <i>Resources:</i> RSM.	For public meetings and consultation process on land acquisition and resettlement.	Consultation materials available and distributed within local communities and to affected persons.	
PR6 Biodiversity and Living Natural Resources							
6.1	Wildlife Crossings at Kostajnica: Add to the Project design at least one additional box culverts to run under the Motorway embankment at Kostajnica, in the area identified in the River Bosna Screening Report where animals are known to cross to the river. These culverts should be at least 2.5 m high and 10 m in width, and should be designed for the target species to ensure they have safe passage. The advice of a local ecologist should be sought for the final location, sizing and design. These should be designed to comply with the requirements of the forthcoming Regulation on Animal Crossings (expected in later 2017). During the post-construction rehabilitation, the advice of an ecologist should be sought to ensure that suitable vegetation is planted on the approaches to these culverts, to signal their presence to animals.	Crossing for protected species is maintained.	PR6: Biodiversity Conservation and Sustainable Management of Living Resources.	<i>Responsibility:</i> RSM to include in Tender Documentation. <i>Resources:</i> Once specified, will be part of Project cost proposed by Contractor.	To be addressed before Tender Documents agreed, unless part of design and build Contractor's output.	Map/drawings with sufficient design detail for these to be costed and established. Built as per design.	
6.2	Biodiversity Management Plan: RSM will develop and implement a Biodiversity Management Plan (BMP) to ensure that construction activities (and future operations) meet EBRD's <i>No Net Loss</i> requirements for Priority Biodiversity Features. The BMP will include a suite of standard on-site mitigation measures aimed at avoiding/minimising/mitigating impacts to Priority Biodiversity Features (as identified in the River Bosna Biodiversity Screening Report, 2017). The BMP should include good industry practices related to road mitigation, as well as providing specific guidance on: <ul style="list-style-type: none"> Flora/fauna surveys to be completed by qualified ecologists prior to vegetation clearance in the right of way to confirm adequacy of mitigation measures proposed in the EIA and River Bosna Biodiversity Screening Report; Construction scheduling to avoid impacting species and habitats of conservation importance throughout the year (e.g. bird nesting periods); Site specific restrictions when working near water / within riparian areas; Measures to protect birds (including fence / noise barrier design); Installation of wildlife friendly culverts at Lukavica River, and Grapska Creek; Development and implementation of a Reinstatement Plan, including Key Performance Indicators (KPIs) which qualify/quantify successful revegetation; Monitoring Plan, including monitoring parameters, frequency & reporting. 	Good Industry Practice. Compliance with EBRD Performance Requirements	PR1: Assessment and Management of Environmental and Social Impacts and Issues. PR6: Biodiversity Conservation and Sustainable Management of Living Resources.	<i>Responsibility:</i> RSM & Contractor. <i>Resources:</i> Specialist consultant & RSM staff.	Prior to Construction. Tender Documents to be prepared and issued in accordance with RSM's Project schedule. BMP to be updated prior to Operations and implemented by RSM.	Tender Documents containing all specified requirements, available for review by EBRD. Supervising Engineer to have reviewed and approved that plans meet EBRD PRs or Good International Practice (GIP) where appropriate. CESMP implementation supervised by Engineer. Monthly reports to RSM from Engineer	

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	The BMP will need to be updated by RSM to address future operations.					during construction. Updated BMP for operations. Annual AESR Report to EBRD.	
6.3	Borrow Management Plan: RSM to ensure that Tender Documents specify that the Contractor's Borrow Management Plan (see 1.1) should include: location of proposed extraction sites, plan for access, dust management on access roads, stockpile locations and management, and plan for rehabilitation of sites, commitments to obtain all regulatory approvals, and a prohibition on establishing new borrow locations in the River Bosna watercourse. This Plan should also establish that taking material from the river basin is only to be done from existing, permitted extraction facilities, where there is clear, specific approval from the authorities. In addition, the Engineer should verify that the borrow pit will not affect any aquatic habitats identified and mapped in the Screening Exercise. The Contractor is not permitted to open new extraction pits within the river basin.	Degradation of water quality and river bed in watercourses.	PR6: Biodiversity Conservation and Sustainable Management of Living Resources.	<i>Responsibility:</i> RSM. <i>Resources:</i> Contractor to include costs in Bid Price.	Requirement included in Tender Documents. Plan ready for approval before works begin.	Appropriate section included in Tender Documents. Borrow Management Plan approved by Engineer.	
PR8 Cultural Heritage							
8.1	Chance Finds Procedures: RSM shall require the Contractor to include in his Construction Environmental and Social Management Plan, a section on the procedures to be taken to ensure the protection of any known cultural heritage resources to the Project area, and implement a Chance Finds Procedure, in accordance with the requirements of the Ecological Permit and EBRD PR8.	Minimising risks to cultural heritage sites.	PR8: Cultural Heritage.	<i>Responsibility:</i> RSM. <i>Resources:</i> Contractor to include implementation costs in Bid Price.	Requirement included in Tender Documents. Plan ready for approval before works begin.	Appropriate section included in Tender Documents.	
PR10 Information Disclosure and Stakeholder Engagement							
10.1	Stakeholder Engagement and Disclosure of Project Information: Implement Stakeholder Engagement Plan and update as necessary. RSM to ensure Contractor (& as necessary the Supervising Engineer) are involved in engagement with stakeholders. Contractor to develop their own SEP, inserting appropriate links to the RSM SEP, to cover implementation of the actions relevant to them as part of this. Pre-Construction SEP actions include (but are not limited to): <ul style="list-style-type: none"> • Disclose the EIA for the Project, the Non-Technical Summary (NTS), SEP, LARF, Biodiversity Screening Report, and this ESAP on RSM's website. • Consultation materials on the grievance mechanism for the land and acquisition process should be prepared and distributed at relevant locations in the villages containing PAPs as soon as possible. • Consultation meetings with PAPs to complete the socio-economic survey of PAPs and review of census materials to ensure all assets (including non-registered assets) have been identified to inform the LARP. 	Management of risks and impacts on affected communities & other stakeholders.	PR 10: Information Disclosure & Stakeholder Engagement.	<i>Responsibility:</i> RSM. Contractor. <i>Resources:</i> RSM. Contractor. <i>(Supervising Engineer as required).</i>	Before construction phase and continue implementation during construction and operation.	Contractor SEP developed prior to construction start. Consultation undertaken, information disclosed and SEP updated as required. Report in AESR to EBRD.	

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	<ul style="list-style-type: none"> • During these consultations explanations should be provided of the revised access arrangements and access to the Project road when completed; this should be done using the NTS and Project maps. A clear list of underpasses and local service road access arrangements should be available as part of this consultation exercise. • All materials supplied to the public and to support the consultation should be in the Serbian language. 						
10.2	<p>Grievance Mechanism: RSM will disseminate information on the Project grievance mechanism. A pamphlet and poster will be prepared on the grievance mechanism. Relevant clauses will be contained within the contract conditions for the Supervising Engineer and the Contractor regarding their roles in supporting RSM with the grievance mechanism. All grievances should be logged and tracked.</p>						