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 Iss	ues					
1.1	Ensure that Requirements from the Environmental Permit and this ESAP are included in Tender Documents: RSM will ensure that the Tender Documents prepared for the Project include the following: • All requirements of the Environmental Permit which apply to this Project, as well as the requirements of this ESAP; • A clear requirement for the Contractor to develop a full Construction Environmental & Social Management Plan (CESMP) which includes the following: • Site Management Plan, • Dust Management Plan, • Noise and Vibration Control Plan, • Borrow Management Plan, • Waste Management Plan, • Waste Management Plan, • Waste Management Plan, • Materials Management Plan, • Emergency Preparedness and Response Plan, • Biodiversity Management Plan (if required by the Screening Exercise), • Method Statement for Working in and Close to Watercourses, and • Management of in-combination effects of concurrent tunnelling works (see 1.2). • EBRD 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.	All construction-related environmental and social issues and impacts are appropriately addressed. Compliance with EBRD Performance Requirements Compliance with local legal requirements	PR1: Assessment and Management of Environmental and Social Impacts and Issues. PR2: Labour and Working Conditions. PR3: Resource Efficiency and Pollution Prevention and Control. PR4: Health & Safety. PR6: Biodiversity Conservation and Sustainable Management of Living Resources.	Responsibility: RSM. Resources: In house (RSM).	Tender Documents to be prepared and issued in accordance with RSM's Project schedule. Engineer to be procured to begin in parallel with design-and-build contract.	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. Annual AESR Report to EBRD on road construction.	
1.2	Cumulative Impacts from Tunnelling: RSM shall establish and maintain a collaborative relationship with JP Autoceste (JPAC) of FBiH regarding design and construction of the tunnel Putnikovo Brdo 2, and to understand and appropriately address the in-combination environmental and social effects from the concurrent construction of the tunnel Putnikovo Brdo 2, particularly on traffic and transport, local infrastructure and public safety. RSM shall ensure that the Tender Documents include a clear requirement for the Contractor that sections of the CESMP relevant for the concurrent tunnelling works will be harmonised with respective sections of the CESMP for the JPAC Project.	All construction- related environmental and social issues and impacts are appropriately addressed. Compliance with EBRD Performance	PR1: Assessment and Management of Environmental and Social Impacts and Issues.	Responsibility: RSM. Resources: In house (RSM), state authorities, Contractor, Engineer.	Administrative decision before the Tender Documents are prepared and issued. CESMP to be harmonised with the JPAC CESMP before commencement	Formal administrative decision on cooperation during construction. CESMP to address the in-combination effects of concurrent tunnelling.	

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		Requirements.			of the tunnel works.	Supervising Engineer to have reviewed and approved the CESMP provisions on concurrent tunnelling.	
1.3	Establish an Environmental and Social Management System (ESMS) 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. The system will include integrating management plans required within this ESAP. They should include an Environmental and Social Management Plan (ESMP) which should be a key contractual document related to the Contractor's contract and should include a Construction Environmental and Social Management Plan (CESMP) and an Operational Environmental and Social Management Plan (OESMP). As part of the review of existing procedures that will occur in order to develop the ESMS, RSM will need to review the adequacy of the coverage of their procedures for supervising tunnel works, if this has not already occurred as part of the construction of the two short existing tunnels in RS.	Optimisation of environmental management through a harmonised / integrated system.	PR1: Assessment and Management of Environmental and Social Impacts and Issues.	Responsibility: RSM. Resources: In house, supported by EBRD technical funds / consultants to the extent separately agreed with EBRD.	To be agreed with EBRD, but work to begin prior to construction and be complete by the time of commissioning the new road. The review of adequacy of coverage for supervision of tunnel works needs to occur prior to construction.	ESMS documentation, including provisions for and results of monitoring related to the Project implementation.	
1.4	Operation Environmental and Social Management Plan (OESMP) RSM to develop and implement an OESMP to include the requirements outlined in the Environmental Permit and this ESAP, and include at least the following: Pollution and run-off control, Right-of-way maintenance and vegetation control, Landscaping, Waste management, Emergency preparedness and response. 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.	All operation-related environmental and social issues and impacts are appropriately addressed. Compliance with EBRD Performance Requirements.	PR1: Assessment and Management of Environmental and Social Impacts and Issues.	Responsibility: RSM. Resources: In house (RSM) to budget for ongoing OESMP and monitoring actions. Consultant support for some plans.	OESMP to be developed before commencement of road operation.	OESMP document available before operation begins. Annual AESR Report to EBRD on road operation.	
1.5	Project monitoring and reporting: RSM shall require that the Engineer and Contractor agree the specific Construction phase monitoring programme, to include the requirements of the Environmental Permit and this ESAP, i.e.: • Pre-construction baseline monitoring to be conducted for air quality, noise, structural integrity of dwellings (in case of tunnel blasting), surface water quality; • Construction monitoring to include: air quality, noise levels, vibration at receptors affected by tunnelling (in case of blasting), groundwater	All construction and operation related environmental and social issues and impacts are appropriately addressed.	PR1: Assessment and Management of Environmental and Social Impacts and Issues. PR3: Resource Efficiency and	Responsibility: RSM to oversee and ensure implementation. Contractor to organise. Engineer to	Prior to construction: Baseline monitoring and Construction monitoring plan. Prior to	Documented monitoring plans, approved by RSM and the Engineer. Monthly, quarterly, and annual reports to	

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	quality and level, surface water quality, visual inspection of crops, and soil contamination. • Biodiversity monitoring (if the Screening Exercise is followed by the Biodiversity Management Plan). RSM shall require the Road Maintenance Contractor to conduct the specific Operation phase monitoring, to include the requirements of the Environmental Permit and this ESAP: • Operation monitoring to include: air emissions (including tunnels portals and ventilation shafts), noise levels, runoff effluent quality, surface water quality in case of accidents, soil contamination, and biodiversity monitoring (if required by BMP).	Compliance with EBRD Performance Requirements. Compliance with local legal requirements.	Pollution Prevention and Control. PR6: Biodiversity Conservation and Sustainable Management of Living Resources.	approve monitoring plan and supervise during construction. Resources: Contractor, procured to third-party.	operation: Operation monitoring plan.	RSM from Engineer during pre-construction and construction. Reports on monitoring results during operation. Annual reports to authorities. Annual AESR Report to EBRD.	
PR2	Labour and Working Conditions						
2.1	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.	Effective and improved HR & workforce management.	PR2: Labour and Working Conditions.	Responsibility: RSM to develop requirements in Tender, Contractor responsible to implement during Construction. Resources: Contractor.	Prior to construction commencing	HR Policies in place and approved by Supervising Engineer.	
2.2	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. Contractor to implement policy.	Local economic benefits and restoration of livelihood affected by displacement due to the Project	PR2: Labour and Working Conditions. Good practice.	Responsibility: RSM to develop requirements, Contractor responsible to implement during Construction. Resources: Contractor	Prior to finalisation of Tender Documents.	Appropriate sections on labour and workforce provisions in revised Tender Documents. Local employment during construction should be recorded by Contractor and submitted to Supervising Engineer. Include in annual AESR report to EBRD.	
2.3	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	Effective workforce management.	PR2: Labour and Working Conditions. PR4: Health &	Responsibility: RSM to develop requirements in Tender,	Measures outlined within CESMP prior to construction and	Measures outlined in CESMP.	

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	Project.		Safety.	Contractor responsible to implement during Construction.	implemented throughout construction.		
				Resources: Contractor.			
2.4	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.	Minimising disturbance to local communities.	PR2: Labour and Working Conditions.	Responsibility: RSM to develop requirements, Contractor responsible to implement during Construction. Resources: Contractor.	Prior to agreements over temporary land to locate worker accommodation.	Consultation complete and no complaints regarding operation of worker camps.	
PR3	Resource Efficiency and Pollution Prevention and Control						
3.1	Air Quality Monitoring During Construction: The Contractor shall develop an air quality monitoring plan, as part of the CESMP, which will define monitoring regime and representative locations based on their actual proximity to receptors. The plan shall be agreed with the Engineer and approved by RSM and air quality monitoring reports provided.	All construction related environmental and social issues and impacts are appropriately addressed. Compliance with EBRD Performance Requirements. Compliance with local legal requirements.	PR1: Assessment and Management of Environmental and Social Impacts and Issues. PR3: Resource Efficiency and Pollution Prevention and Control.	Responsibility: RSM to oversee and ensure implementation. Contractor to organise. Engineer to approve monitoring plan and supervise during construction. Resources: Contractor, procured to third-party.	Prior to construction: Baseline monitoring and Construction monitoring plan	Documented monitoring plans, approved by RSM and Engineer; Monthly, quarterly, and annual reports to RSM from Engineer during pre-construction and construction. Annual reports to authorities. Annual AESR Report to EBRD.	
3.2	Noise & Vibration Monitoring during Construction: The Contractor to develop a noise and vibration monitoring plan during construction, as part of the CESMP, which will define monitoring regime and locations based on their actual proximity to receptors. The plan will need to be agreed with the Engineer and approved by RSM and noise monitoring reports provided. If blasting is to be used for tunnel excavation, the structural integrity of buildings close to the tunnel excavation area should be inspected and recorded before and after blasting, and vibration levels measured at representative receptor locations during blasting.	All construction related environmental and social issues and impacts are appropriately addressed. Compliance with EBRD	PR1: Assessment and Management of Environmental and Social Impacts and Issues. PR3: Resource Efficiency and Pollution Prevention and Control.	Responsibility: RSM to oversee and ensure implementation. Contractor to organise. Engineer to approve monitoring plan and supervise	Prior to construction: Baseline monitoring and Construction monitoring plan	Documented monitoring plans, approved by RSM and Engineer; Monthly, quarterly, and annual reports to RSM from Engineer during pre-construction	

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		Performance Requirements. Compliance with local legal requirements.		during construction. Resources: Contractor, procured to third-party.		and construction. Annual reports to authorities. Annual AESR Report to EBRD.	
3.3	Air Quality Monitoring During Operation: The operations contractor shall develop an ambient air quality monitoring plan, as part of the OESMP, which will consider areas of tunnels' portals and ventilation shafts and define the monitoring regime and representative locations based on their actual proximity to receptors. The plan shall be approved by RSM and air quality monitoring reports provided.	All road operation related environmental and social issues and impacts are appropriately addressed. Compliance with EBRD Performance Requirements. Compliance with local legal requirements	PR1: Assessment and Management of Environmental and Social Impacts and Issues. PR3: Resource Efficiency and Pollution Prevention and Control.	Responsibility: RSM to oversee and ensure implementation. Resources: Contractor, procured to third-party.	Ambient air quality monitoring plan to be developed before commencement of road operation.	Reports on ambient air quality monitoring. Annual reports to authorities. Annual AESR Report to EBRD.	
3.4	 Noise Barriers: RSM shall ensure the review of the 2010 design of noise control measures for the Project to check: is the proposed noise barrier still adequate for the present number and position of receptors; and what are the potential noise effects of the proposed overpass and viaduct on nearby receptors, which were not addressed in the 2010 EIA or in the noise model. 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. 	All RSM's E&S risks are appropriately addressed and actions tracked.	PR3: Resource Efficiency and Pollution Prevention and Control. RS Rulebook on allowed sound intensity and noise levels, 1989.	Responsibility: RSM. Resources: Once specified, will be part of Project cost proposed by Contractor.	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.	
3.5	Flood Studies: RSM to engage experts to review the flood studies done as part of the Main Design for the bridge across the Bosna River, to ensure that they incorporate the 2014 flood information. 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.	Risks to Project infrastructure from flooding. Risks to nearby environment from Project-related flooding.	PR3: Resource Efficiency and Pollution Prevention and Control.	Responsibility: RSM. Resources: Once specified, will be part of Project cost proposed by Contractor.	Urgent. Revised flood studies (or confirmation that current ones remain relevant) and design revisions (if necessary) needed before Tender Documents finalised.	Revised flood studies reports approved by relevant stakeholders, including river basin authority and state design review commission. These should also be reviewed by EBRD.	

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3.6	Spoil Management Plan: The Contractor shall include in his CESMP, a Spoil Management Plan related to the disposal of surplus material (spoil), which details the expected spoil material locations and volume, proposed locations and transport, permits, options for reuse/disposal, and mitigation measures including restoration. This should require borrow pits or other degraded areas to be used to deposit spoil where possible, and should require all spoil deposit locations to be approved by the relevant authorities.	All construction related environmental and social issues and impacts are appropriately addressed. Compliance with EBRD Performance Requirements. Compliance with local legal requirements.	PR1: Assessment and Management of Environmental and Social Impacts and Issues. PR3: Resource Efficiency and Pollution Prevention and Control.	Responsibility: RSM to ensure implementation. Contractor to organise. Engineer to approve management plan and supervise during construction. Resources: Contractor, procured to third-party.	Prior to construction: Spoil management plan	Management plan, approved by RSM and Engineer. Monthly, quarterly, and annual reports to RSM from Engineer during construction. Annual reports to authorities. Annual AESR Report to EBRD.	
PR4	Health and Safety						
4.1	Health & Safety Plan (OHS) During Construction: Contractor will establish a Health and Safety Plan as part of an OHS management system in accordance 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. Contractor to ensure sufficient provision of medical care facilities and resources for workforce. Contractor shall undertake appropriate measures to reduce the risk of transfer of STDs among the Contractor's Personnel and the local community including providing condoms and information for raising awareness among employees of sexually transmitted disease. The Health & Safety Plan will need to include any measures necessary with respect to unexploded ordinance and any use of explosives for Project construction. RSM to provide any information from the Mining Action Centre of BiH (MAC) to the Contractor to support this. With respect to community health and safety, the Contractor will include health and safety measures to prevent the public from entering the works site, such as appropriate fencing and signage.	Improved health and safety performance and a safe working environment for workforce. Compliance with EBRD requirements on health & safety.	PR2: Labour and Working Conditions. PR4: Health & Safety.	Responsibility: RSM to develop requirements in Tender. Responsibility: Contractor responsible to implement. Review by Supervising Engineer. Resources: Contractor — Designated OHS Manager and appropriate equipment.	Clause needs to be in Tender Documents. Plan must be approved by the Supervising Engineer before construction. Implemented during the construction phase.	Tender document with requirements. Documented Health & Safety Plan - ongoing health & Safety statistics and data. Provide updates to EBRD on implementation, including statistics, in the AESR. In the first AESR, RSM will also include their corporate H&S statistics for the year.	
4.2	Occupational Health & Safety Plan During Operation: RSM will establish a Health and Safety Plan as part of an OHS management system for the operation and 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.	Responsibility: RSM. Resources: RSM & contractors.	Plan must be submitted to EBRD prior to operation of the road. Implemented during the operation of the	Documented Health & Safety Plan - ongoing health & Safety statistics and data. Provide updates to EBRD on implementation,	

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					road.	including statistics, in the AESR.	
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. 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.	Responsibility: RSM to procure Consultant. Resources: 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: Contractor to include relevant Community Health & Safety measures within a Traffic Management Plan (TMP). Haulage routes - avoiding communities as far as 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. 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.	Compliance with EBRD requirements on health & safety and access for the local communities.	PR4: Health & Safety.	Responsibility: Contractor. Review by Supervised Engineer. Resources: Contractor — Designated OHS Manager.	TMP must be submitted and approved by the Supervising Engineer before construction commences. Implemented during the construction phase.	Documented TMP. Provide updates on implementation and statistics to EBRD in the AESR.	
PR5	Land Acquisition, Involuntary Resettlement and Economic Displacement						
5.1	Preparation & Implementation of Land Acquisition & Resettlement Plan (LARP): Complete the preparation and implementation of the Land Acquisition & Resettlement Plan in line with the Law on Expropriation of RS¹ 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 Peoples.	Compliance with EBRD and national requirements.	PR5: Land Acquisition, Involuntary Resettlement & Economic Displacement.	Responsibility: RSM. Resources: RSM. RSM to appoint sufficient support staff to implement the LARF and LARP.	Before construction starts.	Submit LARP to EBRD for review when prepared. Documented and implemented LARP. Report progress in AESR to EBRD.	

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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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.	Responsibility: RSM. Resources: RSM.	For public meetings and consultation process on land acquisition and resettlement.	Consultation materials available and distributed within local communities and to project affected persons.	
PR6	Biodiversity and Living Natural Resources						
6.1	Biodiversity Assessment RSM shall conduct a pre-construction biodiversity screening based on a walkover survey of the Project area by experienced ecologist(s). The screening exercise should: - Confirm the presence of natural habitat or other important or priority biodiversity features that could be affected by the Project; - Establish the risk of the Project to any feature that could potentially be identified; - Identify any mitigation measures that would be needed for a no net loss (or net gain) outcome, addressing the features identified, and - Determine whether a Biodiversity Management Plan (BMP) should be developed. The screening exercise should particularly examine the risks to oak, hornbeam, and beech woodland in the cutting and tunnel portals area and identify appropriate mitigation measures to address these.	All RSM's E&S risks are appropriately addressed and actions tracked.	PR1: Assessment and Management of Environmental and Social Impacts and Issues. PR6: Biodiversity Conservation and Sustainable Management of Living Resources.	Responsibility: RSM to procure specialist consultant. Resources: Specialist consultant & RSM staff.	Prior to Construction.	Biodiversity Screening Assessment Report, reviewed by RSM and EBRD.	
6.2	Borrow Management Plan: RSM to ensure that Tender Documents specify that the Contractor's Borrow Management Plan (see 1.1) includes: location of proposed extraction sites, plan for access, dust management on access roads, stockpile locations and management, plan for rehabilitation of sites, and commitments to obtain all regulatory approvals. Any potential extraction from the Bosna River has to be agreed with the Engineer that no river habitats will be affected and permitted by the water management authority. Cultural Heritage	Degradation of water quality and river bed in watercourses.	PR6: Biodiversity Conservation and Sustainable Management of Living Resources.	Responsibility: RSM. Resources: Contractor to include costs in Bid Price.	Requirement included in Tender Documents. Plan ready for approval before works begin.	Appropriate section in Tender Documents. Borrow Management Plan approved by Engineer.	
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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 in the Project area, and implement a Chance Finds Procedure, in accordance with the requirements of the Ecological Permit, the Construction Permit, and EBRD PR8.	Minimising risks to cultural heritage sites.	PR8: Cultural Heritage.	Responsibility: RSM. Resources: Contractor to include implementation costs in Bid Price.	Requirement included in Tender Documents. Plan ready for approval before works begin.	Appropriate section in Tender Documents.	

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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. Pre-Construction SEP actions include (but are not limited to): Disclose the EIA for the Project, the Non-Technical Summary (NTS), SEP, LARF, and this ESAP on RSM's website. 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. During these consultations explanations should be provided of the construction access arrangements (whatever is known at that point in time) and access to the Project road when completed; this should be done using the NTS and Project maps. All materials supplied to the public and to support the consultation should be in the Serbian language. Grievance Mechanism: RSM will disseminate information on the Project 	Management of risks and impacts on affected communities & other stakeholders.	PR 10: Information Disclosure & Stakeholder Engagement.	Responsibility: RSM. Contractor. Resources: RSM. Contractor. (Supervising Engineer as required).	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.	
	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.						
10.3	Dedicate a responsible person for stakeholder engagement at corporate level. This person will have clear responsibilities in: - coordinating the stakeholder engagement activities of other departments within RSM; - monitoring the implementation of the SEP; - keeping records of all stakeholder engagement activities undertaken by RSM, including records of public meetings; - publication of all relevant information and documentation; - management of stakeholder grievances and keeping records of grievances as defined in SEP, as well as identification of risks associated with the filed grievances and defining corrective actions in cooperation with other involved RSM departments; - updating the SEP as necessary; and - reporting to RSM management and EBRD on stakeholder engagement activities.	Effective stakeholder management	PR 10: Information Disclosure & Stakeholder Engagement.	Responsibility: RSM. Resources: RSM.	As soon as possible	Responsible person for stakeholder engagement appointed and communicated to EBRD.	