

**Environmental and Social Action Plan 51422, Georgia Power Grid Enhancement Project <sup>1</sup>**

No.	Action	Environmental and Social <sup>2</sup> Risks (Liability/Benefit)	Requirement	Resources, Implementation Need and Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status <sup>3</sup>
<b>Performance Requirement 1 – Assessment and Management of Environmental and Social Impacts and Issues</b>							
1.1	Appoint and maintain an experienced and competent E&S Director who is responsible for all E&S elements in the project implementation, including ESAP implementation and for the compliance of the Project with the lenders requirements	ESAP and compliance owners to be appointed	Lenders' requirements	GSE <sup>4</sup>	Appoint before appointment of contractors  Maintain throughout project implementation	Person appointed (subject to non-objection from Lenders) and maintained, acting as the main contact for the lenders and the lenders E&S advisors	
1.2	Appoint or formalise the Project E&S team, as outlined in the Environmental and Social Management Plan (ESMP), reporting to the E&S Director and set out the structure of this team, including any input from the Implementation Consultant, to ensure implementation of	E&S team to be appointed	Lenders' requirements	GSE	Appoint as soon as possible and before the appointment of Contractors	Team appointed and maintained to meet the needs of the Project  Clear roles and communication between GSE and	

<sup>1</sup> The Project is as defined in Schedule 1 of the Loan Agreement

<sup>2</sup> Social', as defined in EBRD's E&S Policy of 2014, refers to those issues which pertain to project-affected people and their communities and workers and related to socioeconomic status, vulnerability, gender identity, human rights, sexual orientation, cultural heritage, labour and working conditions, health and safety and participation in decision making. In the case of this ESAP, health and safety is explicitly referred to in various actions for ease of understanding.

<sup>3</sup> As part of annual reporting to the EBRD, the Project Entity will include in this column a status update for each action.

<sup>4</sup> GSE refers to Georgian State Electrosystem JSC or the "Project Entity" as defined in the Loan Agreement

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	<p>the E&amp;S elements in the Project, to include:</p> <ul style="list-style-type: none"> <li>- E&amp;S Manager(s)</li> <li>- E&amp;S Co-ordinators</li> <li>- Community Liaison Officers, including at least one female CLO for each Project Component.</li> <li>- Resettlement Officers</li> <li>- Environmental officers (one for each project)</li> <li>- Archaeological Clerk</li> <li>-Biodiversity Clerk of Works</li> </ul>					Implementation Consultant as set out in the Work Plan	
1.3	<p>Establish and implement an Environmental and Social Management System (ESMS) aligned to ISO14001 which sets out the roles, responsibilities and procedures to be followed by GSE, including its E&amp;S team and the Implementation Consultant in the implementation of E&amp;S elements of the Project</p>	<p>ESMS in place to ensure mechanisms for the delivery of E&amp;S performance to meet Georgian law and Lenders requirements</p>	<p>Lenders' requirements</p>	<p>GSE</p>	<p>In place by time the Contractors are appointed</p>	<p>Clear procedures in place, leading to effective E&amp;S management</p>	

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1.4	Require all Contractors on each project to each appoint a suitably qualified E&S team, including E&S managers (with a direct reporting line to each Contractor manager) who is responsible for the implementation of the E&S elements of the Project implementation which are to comply with the lenders' requirements.	Contractors E&S team and manager responsible for compliance is appointed	Lenders' requirement	GSE to require the Contractors to implement	For the duration of the Contractors' contract	E&S team is clearly communicated and present on the Project  E&S Manager is appointed and maintains role. E&S Manager is the main point of contact for the Implementation Consultant and GSE with respect to E&S	
1.5	Require the contractor to provide adequate budget and resources so that the E&S obligations set out in the ESAP and ESMP are organised and implemented	Resources and budget to implement E&S obligations are made available	Lenders' requirements	GSE to require the contractors to ensure timely availability of resources to meet E&S obligations.	For the duration of the contractors' contract	Resources budgeted and mobilised in a timely manner	
1.6	Ensure the implementation of the ESMP (ESIA Documents 8.1, 8.2 and 8.3) and its specified plans, ensuring the Contractor ESMP is prepared and meets the requirements set out in the ESMP	Management plans achieve compliance with Lenders' E&S requirements and Georgian requirements	Lenders' requirements  National requirements	GSE  GSE to require contractors to implement the CESMP	GSE to implement as soon as possible.  Contractor to implement from contract award and to be in place before construction starts.	ESMP implemented  CESMP in place and approved by GSE/ Implementation Consultant prior to the start of construction	

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1.7	Update the ESMP and its specified plans (including the CESMP) as necessary as the Project progresses or where there are changes to the Project.	Ensure all E&S mitigation and monitoring measures identified through the Management of Change (MoC) process are reflected in an updated ESMP and comply with lenders' requirements	Lender's requirements	GSE  GSE to require contractors to update the CESMP	After any significant changes that require category 2 or 3 changes as defined by the MoC process  At least every six months during construction and prior to operation consider the need for updates	Plan updated if necessary	
1.8	Reflect in the Contractor contracts, the ESMP obligations making sure that any changes to those obligations that arise after the finalisation of the ESIA, the detailed design or through the Management of Change process (as described in the ESMP) are implemented by the Contractor	Ensure that the Contractors are contractually bound to deliver all ESMP requirements and any changes to the ESMP. Changes to the ESMP are compliant with Georgian law and lenders' requirements	Lenders' requirements	GSE to include obligations in the Contractor contracts.  GSE with support of the Implementation Consultant to ensure the contractor implements the contractor obligations.	By the end of ESIA disclosure and each and any change to the ESMP	Signed contract reflecting the obligations.  Signed variation to the obligations.	

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1.9	Reflect E&S obligations of the ESMP in all Contractors' sub-contractor contracts and any changes to those obligations that arise through the finalisation of the ESIA or the detailed design	Ensure that all sub-contractors are bound to deliver the ESMP requirements	Lenders' requirements	GSE to require that the Contractor includes the E&S obligations in the sub-contractor contracts	When contracts are executed and for changes to contracts driven by changes in the ESMP and CESMP	Signed contracts reflecting clear E&S obligations  Mechanism in place to pass through any changes to E&S obligations so that new obligations are clearly captured in sub-contractor contracts	

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1.10	<p>Manage and monitor the compliance of Contractors and sub-contractors with Lenders' requirements:</p> <ul style="list-style-type: none"> <li>- Develop and Implement a Compliance Execution Plan and a Construction Work Plan for managing and monitoring the performance of Contractors and compliance with ESMP requirements</li> <li>- Include compliance with ESMP and Lenders requirements in the contracts</li> <li>- Undertake monitoring of Contractor E&amp;S performance to ensure compliance with ESMP requirements</li> </ul>	<p>To ensure that the Contractors and sub-contractors are implementing their E&amp;S obligations through all stages of the Project</p>	<p>Lenders' requirement</p>	<p>GSE and Implementation Consultant</p>	<p>Tendering process for Contractors</p> <p>Weekly and monthly monitoring for the duration of the contract</p>	<ul style="list-style-type: none"> <li>- Compliance Execution Plan and procedures available prior to start of construction</li> <li>- Construction Work Plan is in place to monitor the implementation of the ESMP actions</li> <li>- Compliance with ESMP and Lenders requirements included in the contracts</li> <li>- Inspections records and E&amp;S performance included in six monthly report to EBRD</li> </ul>	
1.11	<p>Undertake Georgian EIA of all Project Components and obtain local permits. Ensure the following takes place:</p> <ul style="list-style-type: none"> <li>-obligations added to ESMP as required</li> </ul>	<p>To ensure compliance with Georgian permitting process</p>	<p>Georgian legislation</p>	<p>GSE</p> <p>GSE to add any E&amp;S obligations to the contractor contracts</p>	<p>Prior to construction starting</p>	<p>EIAs complete and permits in place.</p> <p>ESMP and associated plans updated to</p>	

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	- Monitor compliance with permit requirements			in line with Action 1.8		reflect any additional obligations	
1.12	<p>GSE shall provide evidence that the Contractors detailed design meets the E&amp;S design criteria set out in the ESMP outlined in Document 8.2 and 8.3, and includes:</p> <ul style="list-style-type: none"> <li>- specifications set out in Section 3.2.1 of both the Transmission Line (TL) ESMP and the Substation (SS) ESMP</li> <li>- Access track plans</li> <li>- Tree and Vegetation Removal Plans</li> </ul>	To ensure compliance with the lenders' requirements	Lenders' requirements	GSE with support from the Implementation Consultant	Detail designs must be approved by the Implementation Consultant and advised to the lenders prior to the construction of the section of project in question	All plans (detailed designs (Section 3.2.1 of TL and SS ESMP), Access Track Plans, Tree and Vegetation Removal Plans) are reviewed and approved by the Implementation Consultant in accordance with agreed timescales.	
1.13	In accordance with the Management of Change procedure described in the ESMP, GSE will inform the lenders of all Category 3 changes at screening, scoping and assessment stage for approval	To ensure any proposed changes to the designs are compliant with the lenders' policies and requirements	Lenders' requirements	GSE with support from the Implementation Consultant	Prior to agreeing any design changes and prior to any construction	<p>All category 3 changes are notified to EBRD</p> <p>Contractor provides suitable E&amp;S supporting studies for proposed category 3 changes</p>	
<b>Performance Requirement 2 – Labour and Working Conditions</b>							

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2.1	<p>Prepare and implement a human resource policy and procedures which are accessible to workers to ensure rights of workers with respect to:</p> <ul style="list-style-type: none"> <li>- Wages, benefits and accommodation</li> <li>- Working hours, overtime, leave and rest</li> <li>- Equal opportunities</li> <li>- Non-discrimination</li> <li>- Gender equality</li> <li>- Child and Force labour</li> <li>- Bullying and harassment</li> </ul>	Compliance with human resources GIP and with national legislation	<p>Lenders' requirements</p> <p>EU/ILO Standards</p> <p>National legislation</p>	GSE	Plans in place at project execution and implemented throughout the Project	HR policy and procedures in place and being implemented	
2.2	<p>GSE to ensure the Contractors prepare and implement a human resources policy which is accessible to their workforce</p> <ul style="list-style-type: none"> <li>- Ensure Contractors to assign a human resources team at sites with competent personnel to manage the labour issues in line with Lender requirements</li> </ul>	Improved human resources practices and compliance with National legislations and PR2 requirements	EBRD PR2 National legislation	GSE, with the assistance of implementation consultant, to require the contractors to develop and implement their own policy and	Prior to recruitment of employees for construction and during construction	Contractors HR policies available and accessible to their workforce, including organisational chart of HR team assigned to the project, and defined roles and responsibility	

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	- Ensure Contractors and sub-contractors train all their employees about HR procedures and policies.			procedures as part of the CESMP  Construction Contractors to develop these policies and train their employees		Record of employees' trainings performance included in six monthly report to EBRD	
2.3	GSE to establish a formal 'Workers' grievance mechanism' for all direct and sub-contracted employees and provide them with information on the channels and communication protocols for raising a grievance. Workers should be informed of the process at the time of being hired in their local language. As good practice, options for submitting anonymous grievance should be established so that concerns can be raised freely. Refer to EBRD Guidance Note on Employee Grievance Mechanism (2017).	To flag employee concerns and resolve issues avoiding need for court cases against the project.  Improve worker and employee relationships	Lenders' requirement	GSE  Implementation Consultant	Prior to construction activities	Mechanism in place  Grievance register entries  Progress on grievance resolution provided with lender's progress reports	
2.4	Develop and implement a local employment management plan with clear local employment KPIs/ targets to be met by the contractors and subcontractors	Employment opportunities for local people in the affected communities	Lenders' requirements  Georgian Labour Code	GSE  GSE to require the contractor to implement and	Throughout construction	Contractor local recruitment policy in place  Local recruitment offices established	

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		Enhance local communities' relations	Voluntary and good practice	target meeting this KPI		Progress update to lenders	
2.5	Undertake independent construction labour audits against Georgian Labour code and lenders requirements	Construction labour practices comply with national and lenders' requirements	Lenders' requirement Georgian Labour Code	GSE Implementation Consultant	Quarterly starting one month prior to construction	Quarterly labour audit reports by external consultant during first 6 months; 6 monthly audits thereafter until construction complete  Corrective actions tracker  Progress updates on corrective actions submitted to EBRD.	
2.6	Monitor the Construction Contractor and its subcontractors to ensure they develop and maintain employee records/documentation in line with the legislations and Lender requirements including but not limited to:  - Put in place written employee contracts for all employees in their own language including Contractors and subcontractors,	Safeguard employees employment rights	Lenders' requirements Georgian Labour Code	GSE GSE to require Contractor to have appropriate contracts in place	Draft contracts in place prior to recruitment process  Workers contracts in place prior to construction	Employment contracts in place for all workers  Payslips provided to all workers  Working hours and overtime wages are	

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	<p>indicating role, working hours, wages and training to be provided.</p> <ul style="list-style-type: none"> <li>- Establishment of proper working time recording system, i.e. scan card, finger scan or face recognition systems</li> <li>- Announcement of regular working hours at all workplaces</li> <li>- Ensure that a pay slip is provided to all employees monthly basis</li> <li>- Overtime wages should be paid in addition to net wages and overtime working should not exceed legal limits.</li> </ul>					documented in the inspections records.	
2.7	GSE ensures that the Contractors prepare and implement a Workers' Accommodation Plan that meets the lenders' requirements and the requirements set out in the ESMP	Accommodation meets lenders requirements and does not results in social impacts on local communities	Lenders' requirements	GSE  GSE to require contractor to prepare in accordance with requirements of the ESMP	Prior to site mobilisation	Workers' Accommodation Plan reviewed and approved by the Implementation Consultant	
2.8	Undertake accommodation audits of construction workers' accommodation	Compliance with lenders' requirements	Lender's requirement	GSE	Forms part of the weekly inspections	Accommodation complies with requirements	

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				Implementation Consultant		Six monthly report to lenders outlining compliance and progress with any corrective actions	
2.9	Establish and implement procedures for selection of the contractor and their core suppliers based on their social compliance' practices; and a system for periodical assessment of labour rights and conditions of the main suppliers.	Effective supplier/subcontract or management system	EBRD PR 2 National Legislations	Construction Contractor	Prior to construction	<ul style="list-style-type: none"> <li>• Supplier/su bcontractor selection and assessment procedure available and compliant with EBRD PR2</li> <li>• Records of selection and assessment of suppliers/ subcontract ors available</li> </ul>	
2.10	Preparation and implementation of a Security Management Plan by each Contractor on each Component, in line	Improved human resources practices and compliance with	EBRD PR 2 National Legislations	Construction Contractor	Prior to construction	<ul style="list-style-type: none"> <li>• Review contract of the security</li> </ul>	

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	with the Voluntary Principles on Security and Human Rights	National legislations and PR2 requirements  Improved security service  Prevent security risk with proper management				firm to provide all necessary requirements defined in PR2  <ul style="list-style-type: none"> <li>• Training of the security personnel complies with PR2</li> </ul>	
<b>Performance Requirement 3 – Resource Efficiency and Pollution Prevention and Control</b>							
3.1	Plan and implement the disposal of hazardous waste in accordance with national legislation, lenders requirements and GIP. In particular, GSE ensures that the Contractor has in place measures for managing the handling and disposal of any PCBs, asbestos and any other polluting substances found to be present when rehabilitating substations	Hazardous wastes are identified, handled and disposed of in accordance with lenders requirements	Lenders' requirements  International conventions eg Basel; Stockholm	GSE, Implementation Consultant  Contractors	Plans in place prior to construction works and implemented during construction works	Register of hazardous wastes  Waste disposal sites and transportation identified and approved by Implementation Consultant  PCB presence or absence confirmed  PCB disposal and movement in	

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						accordance with international conventions and the approach to be approved by the lenders	
3.2	GSE will investigate and seek to rectify, if required, any complaints relating to noise nuisance	Noise emissions to local residents	Lender's requirements  National legislation	GSE, Implementation Consultant	As required	Complaints recorded and investigated  Noise monitoring undertaken  Corrective action taken and documented	
<b>Performance Requirement 4 – Health and Safety</b>							
4.1	Develop and implement culturally appropriate plans and procedures during construction to protect local communities, to include:  - Occupational Health and Safety management Plan (as noted in 4.4 below)  -Community Health and Safety Management Plan	Local communities are informed of risks and protected from hazards	Lenders' requirements  Good international practice  National legislation	GSE  GSE to require contractors to implement necessary plans as part of CESMP  Local police force informed and support if needed to deal with poor	Plans in place ahead of construction works and implemented throughout project implementation	Plans in place  Accidents avoided or minimised  Incident and complaints log kept  Progress reports to lenders outlining progress and corrective actions	

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	<ul style="list-style-type: none"> <li>-Traffic Management Plans (see action 4.2)</li> <li>- Public notices and signs of construction work and hazards</li> <li>- Emergency Preparedness and Response Plans</li> <li>- Security measures during construction</li> <li>- Notices/signs and barriers to all energised areas</li> <li>- Worker’s code of conduct</li> <li>- Gender based violence and harassment</li> </ul>			practice and incidents		Police reports	
4.2	<p>Develop and implement a Traffic Management Plan to protect workers and the local community. Plan to include:</p> <ul style="list-style-type: none"> <li>- Identification of designated transport routes for construction vehicles</li> <li>- Driver training and code of conduct for driving</li> <li>- Actions to limit and check vehicle speeds</li> <li>- Measures to minimise local obstructions</li> </ul>	Traffic accidents are avoided or minimised	<p>Lenders’ requirements</p> <p>National legislation</p>	<p>GSE</p> <p>GSE to require the Contractors to implement as part of CESMP</p>	Plan in place prior to construction and implemented throughout project implementation	<p>Plan in place</p> <p>Incident and complaints log kept</p> <p>Progress reports to lenders outlining progress and corrective actions</p>	

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	- Traffic safety measures (eg use of signs, barriers and flag men as appropriate) particularly near to sensitive receptors e.g. schools, hospitals, ,						
4.3	Require the Contractors to each appoint a suitably qualified health and safety (H&S) team, with suitably qualified and experienced H&S managers (with a direct reporting line to each Contractor manager) who is responsible for the implementation of the health and safety elements of the Project implementation which are to comply with the lenders' requirements.	Contractors H&S team and manager responsible for compliance is appointed	Lenders' requirement	GSE, Implementation Consultant, to require the Contractors to implement	For the duration of the Contractors' contract	H&S team is clearly communicated and present on the Project  H&S Manager is appointed and maintains role. H&S Manager is the main point of contact for the Implementation Consultant and GSE with respect to H&S	
4.4	Require the Contractors to prepare and implement OHS Plan which is pursuant to its health and safety management system. The plan must include:  - hazard and risk identification  - protection and prevention measures  - specific measures relating to electrical safety during commissioning works	Health and safety of workers are actively managed and protected	Lenders' requirements  National legislation	GSE, Implementation Consultant, to require the Contractors to implement	H&S Plan to be approved before any works commence and to remain in operation for duration of the contract	H&S Plan is reviewed and approved by the Implementation Consultant and GSE  H&S statistics – loss of time on the project  H&S Improvement plan implemented to	

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	<ul style="list-style-type: none"> <li>- safety behavioural programme and training</li> <li>- Accident reporting and investigation procedure</li> </ul> <p>The plan must be accessible to all workers taking account of language requirements and any gender specific H&amp;S requirements</p>				<p>H&amp;S monitoring by GSE/Implementation Consultant</p> <p>Monthly H&amp;S Performance report submitted to the Implementation Consultant and GSE</p>	<p>rectify any H&amp;S issues</p>	
4.5	<p>GSE must implement and integrate health and safety measures into the companies H&amp;S management systems for the safe working and operation of all parts of the project to include:</p> <ul style="list-style-type: none"> <li>- workers health and safety</li> <li>- community health and safety, including adequate signage, fencing and barriers to warn, protect and prevent interaction with any live electrical infrastructure and community awareness raising campaigns in each affected settlement</li> </ul>	<p>Workers and communities protected</p>	<p>Lenders' requirements</p> <p>National legislation</p>	<p>GSE</p>	<p>To be in place ahead of each project becoming operational</p>	<p>Evidence of H&amp;S measures in place within GSE H&amp;S management systems</p> <p>GSE to undertake audit of each project once operating and provide report to lenders which demonstrates compliance with H&amp;S measures and safe working procedures for all parts of the project.</p>	

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4.6	<p>GSE to implement a procedure for the monitoring of rights of way to ensure the continued health and safety of communities, to include:</p> <ul style="list-style-type: none"> <li>- registration on masterplans the grid lines</li> <li>- Development and implementation of third party crossing protocols for other infrastructure</li> <li>- stakeholder awareness raising of crossing protocols</li> <li>- monitoring of the right of way in collaboration with local authorities.</li> </ul>	Local communities continue to be protected throughout operation	Lenders' requirements	GSE and Implementation Consultant	To be in place as the projects become operational	Procedures are in place and are being used by local authorities. GSE is collaborating with local authorities and the projects are identified within local masterplans as constraints to development	
<b>Performance Requirement 5 – Land Acquisition, Involuntary Resettlement and Economic Displacement</b>							
5.1	<p>Prepare and implement Resettlement Action Plans (RAPs) in accordance with the Lenders' requirements and in line with LARCF and monitor their implementation Monitoring to comprise:</p> <ul style="list-style-type: none"> <li>- Internal monitoring by GSE including detailed records of all aspects of compensation entitlements and payments</li> <li>- External monitoring by external consultant to report to the EBRD</li> </ul>	Compensation is paid to project affected persons (PAP). Livelihoods are maintained or enhanced especially for poor and vulnerable groups	Lenders' requirement  National legislation	GSE  RAP Consultants  Georgian government and municipalities	RAP reports prepared ahead of construction works  RAP implementation monitored monthly  Six monthly audits by external consultants reporting to EBRD  RAP Completion report 1 year after	All PAPs identified and their compensation and livelihood actions agreed  EBRD and Implementation Consultant to review and approve the RAP  Number of resettlement related	

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	- Special monitoring measures will be defined for vulnerable and physically resettled people				compensation payments made/livelihood restoration initiated	complaints and their resolution.  Progress update to EBRD with reporting on targets (targets to be validated with EBRD).	
5.2	Identify the vulnerable persons and households during the preparation of the RAP.  Vulnerable households will be engaged directly to ensure their needs are appropriately understood and appropriate assistance is provided without any interference from the broader community	Protect vulnerable groups and ensure they are not disproportionately affected by the Project	Lenders' requirement	GSE RAP Consultants	RAP preparation, before start of construction	- List of all affected vulnerable households available in the RAP  - Records of all individual engagement with affected vulnerable households and vulnerable groups are included in the RAP	
5.3	Protect women rights during the RAP preparation:  - Organise women only meetings during RAP design and implementation	Women face multiple issues to secure their individual rights to land ownership,	Lenders' requirement	GSE RAP Consultants	RAP preparation, before start of construction	- Records of all women only meetings are documented in the RAP	

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	- Engage spouses together to discuss the information on land registration, land acquisition and compensation and resettlement process	particularly in rural areas				- Records of private meetings are documented in the RAP.	
5.4	Develop and implement Livelihood restoration measures	Specific livelihood restoration measures might be necessary where restrictions on use are imposed on natural resources commonly used by communities, and for vulnerable affected households	Lender's requirements	GSE RAP Consultants	During RAP preparation	Livelihood restoration measures are defined in the RAP and households benefiting from these measures are defined and listed	
5.5	Undertake RAP completion audit for all land acquisition compensation and livelihood restoration activities	Provides confirmation and final evaluation of the RAP process and that livelihoods have been restored as per the requirements set out in the LARCF	Lender's requirements	GSE	After RAP Completion	Audit signed off by external auditor and issued to EBRD for approval and determination of need for whether further ongoing monitoring is required	
<b>Performance Requirement 6 - Biodiversity and Living Natural Resources</b>							

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6.1	GSE appoints a Biodiversity clerk of works to monitor the Contractors and to ensure that impacts on biodiversity are avoided or minimised	Protection of biodiversity in accordance with lender policies	Lenders' requirements	GSE  Biodiversity consultants	To be in place for the duration of the construction works and to undertake pre-construction surveys	Protection or avoidance measures in place during breeding and nesting seasons  Sensitive areas are avoided and/or protected the details of which are provided in the 6 monthly reports to the lenders	
6.2	Ensure that Vegetation and Tree Clearance Plans (VTCP) and site reinstatement plans are prepared and implemented which demonstrate how:  - vegetation and tree clearance will be minimised  - clearing schedule takes account of fauna nesting constraints  - impacts on biodiversity are to be minimised  - site will be restored eg species proposed and aftercare plans	Protection of biodiversity in accordance with lender policies	Lenders' requirements,  National Legislation	GSE  GSE to ensure that the Contractor implements in strict accordance with ESMP	Prior to construction works  Site reinstatement plans are provided prior to completion of works  Ongoing during the operation of the project to ensure continued biodiversity protection	Contractor VTCPs demonstrate ways to minimise clearance and are submitted for approval by the Implementation Consultant  GSE VTCP submitted to EBRD for approval and demonstrates clear biodiversity protection measures	

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No.	Action	Environmental and Social <sup>2</sup> Risks (Liability/Benefit)	Requirement	Resources, Implementation Need and Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status <sup>3</sup>
6.3	Prepare and implement a Reforestation Management Plan setting out a tree replanting programme to compensate for the loss of trees removed by the project	To meet the requirement of no net loss of biodiversity	Lenders' requirement, National Legislation	GSE National Forestry Agency Local municipalities	Plan to be agreed based on the tree loss defined in the Contractors VTCPs and to be in place 6 months after these plans are provided to GSE by the Contractors	Reforestation Management Plan is submitted to EBRD for approval  Suitable land is identified  Appropriate species are used and an aftercare programme is implemented	
<b>Project Component Specific Actions - Component C1 Nenskra to Mestia (Mestia line) – Loan Tranche 2</b>							
6.4.	Implement the Bird monitoring programme set out in the ESMP to include: - Caucasian black grouse, Caspian Snowcock and raptors on Mestia line	Monitor effectiveness of the collision risk mitigation	Lenders' requirements	GSE Ornithological Consultants	Annual Spring and Autumn surveys for 5 years after completion Monitoring reports provided after each survey period	Monitoring programme and methodology developed, which must be approved by EBRD Corrective actions implemented as required	
6.5	Agree data sharing arrangements with relevant stakeholders and support Birdlife International/ Sabuko to develop a Management Action Plan for black grouse in the Svaneti IBA	To improve knowledge and long term protection of the black grouse	Lenders' requirement	GSE Sabuko/ Birdlife International	Support to be provided for 5 years after completion	Management plan in pace Data provided to Sabuko/ Birdlife International	
<b>Project Component Specific Actions - Component C2 Lajanuri to Tskaltubo (Lechkhumi and New Derchi line) - Loan Tranche 1</b>							

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6.6	Implement the Bird monitoring programme set out in the ESMP to include:  - Bird collision monitoring on the New Derchi and Lechkhumi line	Monitor effectiveness of the collision risk mitigation	Lenders' requirements	GSE  Ornithological Consultants	Annual Spring and Autumn surveys for 5 years after completion  Monitoring reports provided after each survey period	Monitoring programme and methodology developed, which must be approved by lenders  Corrective actions implemented as required	
<b>Performance Requirement 7 - Indigenous Peoples</b>							
7.1	GSE shall:  a) Participate in the re-assessment of the applicability of PR7 to the Svan people, including external engagement, in accordance with PR7 and Good International Practice (GIP) in a manner satisfactory to EBRD and  b) In co-ordination with EBRD, develop a plan to implement the conclusions and recommendations of the re-assessment, if required, in accordance with PR7 and GIP and in a manner satisfactory to EBRD	Address gaps in applicability assessment	EBRD requirement	GSE  Consultant support – EBRD provided for item a) and b)  Items a) and b) to be co-ordinated by EBRD and undertaken as a joint assessment with other current EBRD project, Nenskra HPP, in Svaneti.	Actions to be completed:  Items a) and b) prior to disbursement of Tranche 2	a) Applicability re-assessment completed and approved by EBRD  b) Implementation plan developed and approved by EBRD with input from GSE (If required as a result of the applicability re-assessment); updated ESAP	

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	c) undertake actions as described in the implementation plan in a manner satisfactory to EBRD				Item c) prior to any physical works (including site clearance and disturbance) and/or restrictions on land access for Tranche 2	approved by EBRD c) closure of actions as per the schedule described in the implementation plan	
7.2	Additional actions for the Project arising from the EBRD Board approved Management Action Plan (MAP) for the Nenskra HPP project are to be defined by EBRD, and an implementation plan shall be developed and included in the ESAP in a manner satisfactory to EBRD	Aligned approach to managing any common issues across both projects	EBRD requirement	GSE  Resources - TBD	EBRD Board MAP Approval + 30 days	Implementation plan developed and approved by EBRD with input from the Project Entity; updated ESAP approved by EBRD	
<b>Performance Requirement 8 – Cultural Heritage</b>							
8.1	Develop and implement a Cultural Heritage Management Plan for each Component to define the steps and measures to avoid and mitigate impacts on cultural heritage in consultation with local stakeholders.	Avoidance and minimisation of impacts on cultural heritage	Lenders' requirements	Construction Contractors	During the detailed design, to be in place for the duration of the construction works and to undertake pre-construction consultation	Cultural Heritage Management Plan available for each Component	

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8.2	GSE appoints an Archaeological clerk of works to monitor the Contractors and to ensure that impacts on cultural heritage are avoided or minimised	Protection of cultural heritage features in accordance with lender policies	Lenders' requirements	GSE  Archaeological consultants	To be in place for the duration of the construction works and to undertake pre-construction surveys	Protection or avoidance measures in place for identified cultural heritage features  Sensitive areas and any cultural heritage finds are avoided and/or protected the details of which are to be reported in the six monthly reports to the lenders	
8.3	Prepare and implement a Chance Finds Procedure	Minimise the risk of impacts on cultural heritage	Lenders' requirements  National legislation	GSE  GSE to require contractors to prepare and implement	Prior to construction activities	Plan prepared and submitted to Implementation Consultant for review and non-objection  Records of finds and implementation of procedure provided in six monthly reports to lenders	

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<b>Performance Requirement 10 - Information Disclosure and Stakeholder Engagement</b>							
10.1	<p>Implement Stakeholder Engagement Plan (SEP) and monitor its effectiveness.</p> <p>Specific measures shall be developed and implemented during the lock down due to Covid -19 to ensure safety of communities and workers.</p> <p>SEP to be continually updated and implemented for the operation phase to raise awareness of easement restrictions</p>	Ensures effective stakeholder engagement and good community relations	Lenders' requirement	<p>GSE – alignment with Community Visibility Plans</p> <p>Implementation Consultant</p> <p>Contractor</p>	Ongoing through project implementation and into operation phase	<p>Community engagement and activities undertaken</p> <p>Meeting register and minutes of meetings for EBRD to review</p>	
10.3	Implement and maintain an effective community grievance mechanism in line with the PR 10 requirements	Ensures effective stakeholder engagement and maintains good community relations	Lenders' requirements	GSE Contractors	Ongoing throughout the project implementation	<p>Record of grievances on the grievance register</p> <p>Record of Grievance Resolution Committee meetings</p> <p>Monthly reports from Contractor and Six-monthly reports to lenders capture grievances and their management</p>	