

Table Environmental and Social Action Plan

NO	ACTION	ENVIRONMENTAL & SOCIAL RISKS (LIABILITY / BENEFITS)	REQUIREMENT (LEGISLATIVE, EBRD PR, BEST PRACTICE)	RESOURCES, INVESTMENT NEEDS, RESPONSIBILITY	TIMETABLE	TARGET AND EVALUATION CRITERIA FOR SUCCESSFUL IMPLEMENTATION	STATUS
Corporate Level							
1	Prepare and submit reports on status of this Environmental and Social Action Plan, resolution of grievances and EHSS performance of the project	Monitoring of ESAP implementation and EHSS performance	EBRD PR1-10	Regia Autosalubritate	Annually	Submission reports on progress of implementation of ESAP, grievance resolution & EHSS performance (to EBRD)	
2	Publish a Non-Technical Summary (NTS) of this project according to the requirements in SEP	Public communications of new projects and developments	EBRD PR10,	WSP PB has developed this Plan on behalf of Iasi County Council	March 2017	Disclose NTS on web sites Provide link to NTS in annual report	
3	Develop a formal employment (HR) policies to cover areas such as discrimination, equal opportunities, employment of young persons, wages (wage levels, normal and overtime), working hours, benefits, grievance mechanism for workers, dismissal, trade union recognition, collective bargaining, health and safety, harassment, forced labour, bullying, stress, bribery and corruption etc.	Social and employment Policies	Best practice EBRD PR2	Regia Autosalubritate	End of 2017	Social and Employment policies	
4	Disclose the draft SEP, address comments and suggestions after the disclosure period, finalise the SEP, implement SEP and regularly update the document as new information becomes available SEP will include a grievance mechanism that should be implemented if there are complaints	Ensure that people are informed and consulted about environmental and social issues related to the Project and that grievances are addressed in a transparent and timely manner.	Best practice EBRD PR 10	Regia Autosalubritate, PIU social manager	Draft SEP Disclosure – March 2016 Final SEP - December 2017 Implementation throughout project implementation period	Stakeholder Engagement Plan Grievance log and grievance management reports	
5	Appoint a social manager in the PIU to implement the LRF and SEP and report to the lenders	Ensure the implementation of the LRF and SEP	EBRD PR 1	Regia Autosalubritate	Prior to commencement of Project	PIU social manager appointed and regularly reports on	

						the Project progress to the Bank.
6	Develop a Project Implementation Unit (PIU) with the company involved as required	Management capacity	EBRD PR 1	City and Regia Autosalubritate	Prior to commencement of Project	PIU team appointed
7	Assign staff with EHS management responsibilities, provide training and undertake recruitment as required. Update corporate EHS organisational structure Ensure site level EHS management responsibilities for all the investment sites namely Tintareni landfill, Ciocana dump site and the transfer station and new facilities that will be built i.e. a new waste sorting facility and a new digestion plant.	Clear management of EHS issues	Best practice EBRD PR 1 and PR2	Regia Autosalubritate, staff resources	Prior to commencement of Project	Staff employed, trained and appointed roles. CVs provided
8	Disclose the draft LRF, address comments and suggestions after the disclosure period, finalise the LRF and then implement LRF	Ensure that economic displacement of waste pickers has been mitigated	EBRD PR 5 Best practice	Regia Autosalubritate, PIU social manager	Draft LRF Disclosure - March 2017 Final LRF - December 2017 Implementation - until the end of 2018	Livelihood Restoration Framework Monitoring reports on LRF implementation
9	Compensate any damages made to land surrounding the Ciociana waste dump site during construction works for the closure of the waste dump site and fully reinstate land.	Ensure that no economic displacement occurs for owners / users of land surrounding the Ciociana waste dump	EBRD PR 1 and 5 Best practice	Regia Autosalubritate, PIU social manager	During and after construction works for the Ciociana waste dump.	Any damages to land outside of the Ciociana waste dump site are compensated and land is restored. Monitoring reports on ESAP implementation.
10	Ensure that all community benefits for residents of Tintareni village are implemented, as agreed with the community.	Ensure that the local community accepts the Project and the re/opening of the Tintareni landfill	EBRD PR 1 Best practice	City of Chisinau Regia Autosalubritate, PIU social manager	Prior to commencement of Project and throughout Project implementation.	Monitoring reports on ESAP implementation.
11	Develop an approved supplier list. As part of the tendering process, an assessment of the EHS management policies, procedures and management capacities should be undertaken. All future contractors should have a Construction, Environmental Management Plan (CEMP) that should also include a Transport Management Plan. There should be periodic inspections of the subcontractors to ensure that there is compliance with national laws and EBRD's PR2.	Minimise Health and Safety risks Reduce injuries	Best practice EBRD PR1, EBRD PR2,	Regia Autosalubritate	On issue of tenders Inspections on-going thereafter	Tender specification Inspection reports
12	Develop and implement an Environmental and health and safety management system in line with	Improvement of	Best practice	Regia Autosalubritate and	End of 2017	EMS

	<p>best practice outlined in ISO 14001 and OHSAS 18001</p> <p>This should include an audit program for the EHS management system and legal compliance to be undertaken by an external consulting company to identify gaps and opportunities for Improvement.</p>	EHS performance	EBRD PR1, paragraph 1,2 EBRD PR 2 paragraph 15	external resources		
Site Specific (all sites unless specified)						
13	<p>Ensure that all environmental permits are in place at the appropriate stage of development or closure for the temporary dump site. This should include but not be limited to operational, building and closure permits.</p>	Compliance to EU guidance and National legislation	EBRD PR1 Moldova Permitting Regime	Regia Autosalubritate and external resources	Prior to commencing activities for which permits are required	Permits
14	<p>Health and safety arrangements should be reviewed as part of H&S risk assessment for all sites to include:</p> <ul style="list-style-type: none"> Robust training to ensure competent staff are used on site who are fully conversant with operational procedures, risk assessments and control measures necessary; Personal Protective Equipment provided should be appropriate for the task and worn by all staff and contractors (e.g. sharps gloves, dust masks and eye protection); Visitors to be provided with PPE; All pedestrian walkways and vehicle access areas should be clearly marked; All portable electrical equipment should be assessed for condition and signs of wear and damage and suitability for use; The location and number of first aid kits required; The location and number of fire extinguishers required; and Sun protection and drinking water for workers. <p>Development of procedures for working in confined spaces</p>	<p>Compliance to EU and National legislation</p> <p>Minimise injuries/fatalities due to accidents</p>	EBRD PR 2	Regia Autosalubritate	As part of detailed design and operating procedures prior to commencement of any new activities on the site, and commencement of work of any contractors.	Report on findings of the review along with any remedial measures and timescales for their implementation
15	<p>Ensure the design and operating procedures are in full compliance with the Landfill Directive to cover:</p> <ul style="list-style-type: none"> Security Accident Management Plan Waste characterisation, handling, acceptance, inspection and quarantining. Ensure contract in place detailing waste acceptance criteria and periodic sampling of wastes Control of dust and aerosols including 	Design and operation standards, E&S monitoring	Landfill Directive EBRD PR3	Regia Autosalubritate and Design contractor(s)	As part of detailed design and operating procedures prior to commencement of operations	Detailed Design and Develop Landfill Operating Manual

	<ul style="list-style-type: none"> • monitoring, suppression and early restoration • Stability risk assessment • Site traffic management • Litter control • Prevention of mud on road • Odour control • Noise and vibration control • Pest Control • on-going monitoring of leachate, groundwater, surface water and landfill gas (results should independently audited and be made available in the public domain). Develop monitoring plans that details objectives, standards, monitoring programmes, required monitoring infrastructure and response to any significant impact events. Adopt a risk based approach to determine if monitoring plans are required for noise and odour <p>These should include a design control process and an Operational Environmental Management Plan (OEMP).</p> <p>(Tintareni Landfill Site)</p>					
16	<p>Disclose the draft HRA.</p> <p>Following completion of the HRA undertake:</p> <ul style="list-style-type: none"> • Installation of additional boreholes on the downgradient side of the site (north) which penetrate into the underlying mid-Sarmatian Limestones • Regular leachate and groundwater quality monitoring from existing boreholes and proposed boreholes • Review of the conceptual site model and update to the quantitative risk assessment model, if required on completion of at least three monitoring events <p>(Tintareni Landfill Site)</p>	Design and operation standards, E&S monitoring	Landfill Directive EBRD PR3	Regia Autosalubritate and Design contractor(s)	As part of detailed design and operating procedures prior to commencement of operations	Detailed Design and Develop Landfill Operating Manual
17	<p>Incorporate into the detailed design the following:</p> <ul style="list-style-type: none"> • Interim lining specification to be supported geotechnical assessment • Detailed design required for lining and drainage • Detailed design for leachate treatment plant including full BAT assessment • Prior to capping, remediate if evidence of uncontrolled release of leachate or landfill gas • Detailed design of gas engine plant to meet 	Design and operation standards, E&S monitoring	Landfill Directive EBRD PR3	Regia Autosalubritate and Design contractor(s)	As part of detailed design and operating procedures prior to commencement of operations	Detailed Design and Develop Landfill Operating Manual

	<p>BAT relating to ELVs if it falls under the MCPD and minimisation of GHG emissions</p> <ul style="list-style-type: none"> Strengthen dam and dam slope using Geogrid and install sealing liner <p>(Tintareni Landfill Site)</p>					
18	<p>Measures should be developed for the transport of waste to prevent risk to public with regards to dust nuisance, falling out litter and leakage of waste leachate from vehicles. Vehicle loads should be sheeted and dampening down of access roads should be undertaken if conditions are dusty (Tintareni Landfill Site, transfer station and sorting station)</p>	Reduce potential accidents for employees and the public	EBRD PR2	Internal resource	Prior to commencement of operations	Report on the measures to be implemented
19	<p>Ensure the tariff structure for waste collection from households is set at an appropriate level of average income per capita (no more than 2%). Monitor income and tariffs</p> <p>Develop a monitoring protocol for monitoring affordability with data collection to assess affordability and the performance of the tariff collection system. Develop a procedure for setting and adjusting of the tariffs, billing and collection of payments. Introduce incentivisation schemes to encourage payment and enforcement actions for non-payment / illegal dumping. Implement targeted public awareness campaigns and education activities.</p> <p>(Tintareni Landfill Site)</p>	Socio-economic impacts	EBRD PR1	PIU	Develop income and tariff monitoring procedure as prior to start of landfill operation, implement during landfill operation	Reports on tariff procedure, monitoring on affordability, collection rates, incentivisation schemes and penalties
20	<p>Disclose the draft ESIA, address comments and suggestions after the disclosure period, finalise the ESIA.</p> <p>Implement all mitigation measures identified in the ESIA as detailed in the ESMP, a live document that should be used to document and monitor the implementation of mitigation measures in the ESIA. It should cover:</p> <ul style="list-style-type: none"> Air quality and climate change Noise and vibration Biological and ecological resources Cultural heritage Landscape and visual Geology, soils, material and waste Water environment Traffic and transportation Community Health and safety 	Environmental Impact Assessment	International ESIA Expertise EBRD PR1	WSP PB has developed an ESIA & including ESMP and other component studies	<p>Draft ESIA Disclosure - March 2017</p> <p>Final ESIA - December 2017</p> <p>Implementation throughout project implementation period – design, construction and operation</p>	ESIA

	<ul style="list-style-type: none"> Occupational Health and safety Social and population (Tintareni Landfill Site)					
21	Submit and obtain approval of a revised and separate ESIA following national EIA requirements according to the Moldovan procedure (Tintareni Landfill Site)	Environmental Impact Assessment	Moldovan EIA Expertise EBRD PR1	WSP PB has developed an ESIA & including ESMP and other component studies	Prior to start of construction	Approval for EIA obtained from SEE
22	Investigate stability of previously deposited waste/clay to ensure the integrity of any new lining system will be maintained (Tintareni Landfill Site) Review waste slopes and the degree of re-profiling required to achieve a stable landfill slopes and a suitable landform on which to place capping materials (Tintareni Landfill Site and Ciocana Dump Site)	Design and operation standards, E&S monitoring	Landfill Directive EBRD PR3	Regia Autosalubritate and Design contractor(s)	As part of detailed design prior to commencement of operations	Detailed Design
23	Provide more design information of leachate collection system, particularly of how Phase 1 leachate collection system will be maintained	Design and operation standards, E&S monitoring	Landfill Directive EBRD PR3	Regia Autosalubritate and Design contractor(s)	As part of detailed design prior to commencement of operations	Detailed Design
24	Provide more design information of landfill gas collection system, particularly of how Phase 1 landfill gas collection system will be maintained.	Design and operation standards, E&S monitoring	Landfill Directive EBRD PR3	Regia Autosalubritate and Design contractor(s)	As part of detailed design prior to commencement of operations	Detailed Design
25	Develop and implement the Closure Plan that covers the mitigation measures detailed in the ESIA, Appendix A - Review of Ciocana Closure Pan. In addition it should address: <ul style="list-style-type: none"> on-going monitoring of leachate, groundwater, surface water and landfill gas (results should be made available in the public domain). Review the frequency and duration of the monitoring including action / trigger levels for monitoring. Consider monitoring for lateral migration and surface emissions. Landfill gas monitoring from gas wells to include flow rate and pressure plus ambient meteorological conditions. Also undertake trace gas monitoring to assess potential odour / health risks and also qualitative odour monitoring (sniff tests). Undertake monitoring of flare gas emissions to compare to emission limits. Investigate base of waste mass and if leachate is being intercepted. Leachate collected should be sent to leachate treatment plant at the Tintareni landfill Undertake a Stability Risk Assessment 	Design and operation standards, E&S monitoring	Landfill Directive EBRD PR3	Regia Autosalubritate and Design contractor(s)	As part of detailed design prior to commencement of operations	Detailed Design

	<ul style="list-style-type: none"> Review the final sealing cap to create the 'impermeable layer' Implement Construction Quality Assurance testing Design spacing of waste gas extraction wells for optimal collection efficiency (Ciocana Dump Site)					
26	Prepare and implement a coordinated action plan for the clean-up and closure of existing local dump sites in Tintareni area. Introduce measures to deter future illegal dumping such as secured sites, information boards, programmes to raise awareness, fines and penalties and installation of appropriate local waste collection infrastructure (Tintareni Landfill Site)	Prevention of illegal dumping. Reducing pollution risks	Landfill Directive EBRD PR3	Regia Autosalubritate and external resource	Clean up and closure prior to landfill operations commencing	Dump site Closure Plan in place Quarterly progress reports
27	Negotiate and agree on the local benefits that should be introduced for the communities in Tintareni. These should cover: <ul style="list-style-type: none"> Free of charge waste collection Gate fee tax pay to Tintareni Mayor's Office Regularly clean cesspits at the wastewater facilities of Tintareni public institutions Payment for land lease; Rehabilitation and management of water supply system Building of a Family Doctors Centre Hiring the local people for the landfill operation. (Tintareni Landfill Site)	Community benefits	EBRD PR2 and PR4	City and Regia Autosalubritate	By end of 2017	Report on agreement
28	Include in tendering documents the requirement for contractors to develop procedures/method statements for the project to manage the EHSS issues and mitigation measures identified including but not limited to the below, adopting international best practice in line with the Moldova legislation and the EBRD PRs: <ul style="list-style-type: none"> EHSS procedures Labour, working and worker accommodation conditions Community safety and security Supply chain sustainability Grievance mechanism Consultation and information disclosure requirements in line with the SEP As part of the selection process, an assessment of EHS management policies, procedures and	Minimise Health and Safety risks Reduce injuries	Best practice EBRD PR1 and PR2	PIU,	During preparation of tender specifications/dossiers	Tender dossiers

	management capacities and previous performance should be undertaken.					
29	Prepare and implement a program for raising public awareness and changing behaviour on the following issues: new regional waste management system, waste tariffs for households and other customers, protection of water bodies and irrigation systems from waste dumping and littering, collection of recyclable waste fractions, management of construction and demolition waste, chemicals, asbestos containing materials.	Public outreach program as part of SEP	EBRD PR10	PIU	Prepare prior to start of operation, implement during landfill operation	SEP including public outreach program in place
30	Implement regular contractor inspections / audits and meetings with contractors at least annually to review compliance and advise on corrective actions	Minimise Health and Safety risks Reduce injuries	Best practice EBRD PR2	PIU	During construction phase	Audit reports