



Public Company "REPUBLIC OF SRPSKA MOTORWAYS"

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ENVIRONMENTAL AND SOCIAL ACTION PLAN (PR COMPLIANCE)

No.	Findings	EBRD Performance Requirement (PR)	Proposed Actions	Time frame	Responsibility
1		Policy	The RSM and Contractors shall manage the Project's Environmental, Social and Health and Safety ("ESHS") matters in a manner that is compliant with: applicable national and EU; and International good practice and EBRD Environmental and Social Policy (2008).	All project phases	RSM
2	The RS Motorways company does not have any written HSE policy, standards and rules, and currently nobody inside the company is in charge for the HSE management (The position of the Environmental Protection Engineer is currently vacant).	PR 1 ESHS Management System for construction phase	RSM to establish, maintain, and strengthen as necessary, an organisational structure that defines roles, responsibilities, and authority to ensure the effective monitoring of the ESHS performance of the Contractors. RSM shall appoint an Independent Engineer to monitor the ESHS performance of the Contractors.	Prior to construction	RSM
3		ESHS Management System for RSM	RSM shall establish and maintain an Environmental and Social management system in line with International good practice through the EBRD Institutional Strengthening TC Project.	End of 2010	RSM
4		PR 1	The Contactor shall implement ESH-MS in line with International good practice. This system shall include: Environmental Management Plan, H&S Plan, Training Plan, Grievance process, ESHS monitoring plan, Stakeholder Engagement Plan.	Before Construction - Tender requirement	Contractor

5	The Company human resources policies and management are not fully implemented but the RS Motorway Company staff being employed according to the RS Labour Law.	PR 2 – Working conditions and employment	RSM shall establish and maintain a HR Policy compliant with PR 2 requirements as part of the EBRD Institutional Strengthening TC Project.	End of 2010	RSM
6	Projects will comply with relevant EU OHS requirements and, where such requirements do not exist, relevant IFC EHS guidelines (general and for Toll Roads) in the sections referred to OHS. Based on the Gradiska – Banja Luka motorway working site visits, some OHS non-compliances were found: A	PR 2 – OHS	RSM shall establish and maintain an OHS MS in line with International standard (OSHAS 18001) though the EBRD Institutional Strengthening TC Project. RSM shall appoint an Independent Engineer to monitor the OHS-MS performance of the Contractors.	End of 2010 Before and during Construction	RSM
7	- fuel storage tank without proper safety equipments (fire fighting station, safety signals, etc); - workers without proper fall-protection equipments and/or without hard hats; - temporary excavations not fenced.	PR 2 – OHS	Contactors shall establish and implement an OHS-MS in line with good international practice. e.g. IFC EHS guidelines (General and for Toll Roads) in the sections referred to OHS or with international standards of OHS (OSHAS 18001). Report on performance shall be submitted to be Independent Consultant on monthly basis.	Before and during Construction	Contractor
8			As a minimum all workers on site must attend a ESHS Site Induction and record of training must be maintained.	Before and during construction	Contractor
9	No specific training plan has yet been developed.	PR2 – OHS	All workers shall be given ESHS training and be informed of their obligations described in this ESAP, as appropriate, as part of the training plan. Records of training are to be maintained.	Before Construction Tender emission	RSM
10	No specific written procedures are in place for workers grievances.	PR2 – OHS	The contractor will provide a grievance mechanism for workers to raise reasonable workplace concerns and a process for their resolution.	Before construction	Contractors

			RSM shall appoint an Independent Engineer to monitor the Contractors' workers grievance mechanism effectiveness.		
11	A proper management of Unexploded (UXO) should be ensured for the protection of the on-site workers and community.	PR2 – OHS	A procedure for the management of UXO's shall be established, which include a stop work procedure and safety measures to be adopted in the event of a UXO find.	Before construction	Contractor
12	Implement measures to address issues raised by stakeholders, particularly regarding the negative impacts of dust (during the construction) and noise (during and after the construction).	PR 3 – Noise	The RSM should appoint an independent Consultant to assess the baseline noise level in the area of the MI interchange.	Before construction	RSM
		PR 3 – Noise	The Contractor shall develop a noise and vibration plan/procedures to minimise construction and motorway noise to meet applicable national and EU requirements particularly at sensitive receptors. The plan as a minimum should include; <ul style="list-style-type: none"> - schedule of the activities, - equipment maintenance - consultation with local community - evaluation the need of additional abatement/mitigation measures, based on the results of the noise monitoring. RSM shall appoint an Independent Engineer to monitor the noise levels	Before and during Construction	Contractors
13		PR 3 – Dust	Dust suppression methods will be specified in specific plan and procedures, which should address at minimum: <ul style="list-style-type: none"> - Soil and waste to be cleared from public roads to prevent nuisance and/or a driving hazard; - Work vehicles tyres to be cleaned prior to leave the working site and entering public roads. RSM shall appoint an Independent Engineer to monitor dust levels.	Before and during Construction	Contractors

14	Cumulative impacts of the new MI interchange have not considered in previous EIAs.	PR3 – Atmospheric Contaminants	The RSM should appoint an independent Consultant to assess the baseline atmospheric pollutants (dust, NO _x , SO _x , etc.) level in the area of the MI interchange.	Before construction	RSM
15	Based on the Gradiska – Banja Luka motorway working site visits, some environmental non-compliances were found: - fuel storage tanks without secondary containment; - fuel loading/unloading area not paved and bermed; - chemicals storage area not paved and covered.	PR 3 – Hazardous materials	The Contractors shall provide and implement a Hazardous Materials management plan and procedures. As a minimum the Plan should contain: - PPE - Oil spill contaminant - Clean-up equipment - Proper storage areas for fuel and chemicals RSM shall appoint an Independent Engineer to monitor the Haz. Mat. Plan implementation.	During Construction	Contractors
16	The client will avoid or minimise the generation of hazardous and non-hazardous waste materials and reduce its harmfulness as far as practicable.	PR 3 – Waste management	A specific Waste Management Plan should be developed for the MI project. RSM shall appoint an Independent Engineer to monitor the Waste Management Plan implementation.	Before and during Constructions	Contractors
17	Emergency situations most commonly associated with road operations include accidents involving single or multiple vehicles, pedestrians, and/or the release of oil or hazardous materials. During the site visit the lack of a specific Emergency Preparedness and Response Plan has been identified.	PR 3 – Emergency Response	A Project Emergency Preparedness and Response Plan should be prepared in coordination with the local community and local emergency responders to provide timely first aid response in the event of accidents. RSM shall appoint an Independent Engineer to monitor the Emergency Preparedness and Response Plan implementation.	During Constructions	Contractors
18	The MI will operate moving equipment on public roads and infrastructure. Therefore, the client will seek to prevent the occurrence of incidents and accidents associated with the operation of such equipment.		A Transportation plan for moving equipment and construction material on public roads should be developed and agreed with relevant local Authorities, including also Hazardous Material Transportation Plan (if applicable). RSM shall appoint an Independent Engineer to monitor the Transportation plan implementation.	Before and during Construction	Contractors

	It is usual practice for Contractors to have security guards that may be armed	PR 4	The Contractors Code of conduct for security personnel is to be in line with the Banks ES Policy (PR4 Sections 23-25).	During Construction	Contractors
19	MI project development has resulted in the involuntary resettlement (both physical and economic displacement) of affected individuals. The Client should, therefore, develop and disclose a RAP, which include a procedure on how to deal with grievances.	PR 5	RSM shall implement the RAP.	Before and during Construction	RS Ministry of Infrastructure and Communication
	The RAP will also include procedures to monitor and evaluate the implementation of resettlement plans and take corrective action as necessary.	PR 5	RSM shall provide a Initial Monitoring Report on the implementation of the RAP at the time of the Loan condition effectiveness and annually thereafter for three years as part of the Annual Reporting to EBRD.	Before and during Construction	RSM
20	Disclosure of information should continue during project implementation.	PR 10	Finalise and implement the SEP requirements.	During project preparation and implementation	RSM
21		PR 10	The Contractor shall distribute information on a timely basis prior to work commencing concerning to : <ul style="list-style-type: none"> - Inform affected communities about any construction activities that may affect them (traffic and access obstructions, noise and dust); - Inform affected communities on the progress of construction; - Solicit feedback from community members on the effectiveness of any mitigation measures for construction nuisance, and the availability of the grievance Procedure to the public. 	During project preparation and implementation	RSM
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