

# Environmental and Social Due Diligence, Impact Assessment and Road Safety Audit for the Moldova TENT-T Road Network Rehabilitation Project, DTM 55768

## Environmental and Social Action Plan

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## Project sheet

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# 1. Environmental and Social Action Plan

## 1.1. Approach

The primary objective of this assessment is to confirm the Project's alignment with Environmental and Social (E&S) performance requirements. This is accomplished through the Environmental and Social Requirements (ESR) Compliance Assessment separately conducted by Haskoning; which also proposes necessary measures in the form of an Environmental and Social Action Plan (ESAP) to address any identified gaps. Accordingly, this report should be read in conjunction with Section 3: Project Compliance with EBRD Standards, sub-section 3.2 – Environmental and Social Appraisal Table in the final ESR Compliance Assessment Report issued on 27 February 2026.

## 1.2. Methodology

In line with the methodology defined in Section 3: Project Compliance with EBRD Standards in the ESR Compliance Assessment Report; proposed actions are classified under each applicable standards, followed by a risk classification where the risks are categorized based on the descriptions summarized in below:

Corresponding alignment with the methodology matrix in the ESR Compliance Assessment Report (in Section 3.2) is highlighted in bold in below table.

Risk Categorization	Description
<b>Fatal Flaw</b>	<ul style="list-style-type: none"> <li>Project activities that can result in a significant regulatory non-compliance that may have repercussions for operational shut down, significant reputational damage and/or fines/criminal proceedings for the Project proponents.</li> </ul>
<b>High Risk</b>	<ul style="list-style-type: none"> <li>Project assessments and plans <b>are not aligned with EBRD PR requirements (MN)</b>, substantial effort is required to address these</li> <li>Project activities may lead to irreversible impacts on ecological and/or social resources or receptors</li> <li>Project practices could lead to severe and long term environmental and social impacts</li> <li>Project practices could lead to reputational risks and/or conflict with stakeholders</li> <li>Project practices may lead to regulatory non-compliance and can therefore result in long term business interruptions and fines</li> </ul>
<b>Medium Risk</b>	<ul style="list-style-type: none"> <li>Project assessments and plans <b>are partially aligned with EBRD PR (PC) requirements</b>, effort is required to address these</li> <li>Project practices may lead to regulatory non-compliance and can therefore result in short-term business interruptions and fines</li> </ul>
<b>Low Risk</b>	<ul style="list-style-type: none"> <li>Project assessments and plans <b>are partially aligned with EBRD PR (PC) requirements</b>, limited effort is required to address these</li> </ul>
<b>Negligible/No risk</b>	<ul style="list-style-type: none"> <li>Project assessments and plans <b>are fully aligned with EBRD PR (FC) requirements</b></li> </ul>

Table 1-1: Risk categorization and matrix

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
<b>ESR 1</b>	<b>Assessment and Management of Environmental and Social Risks and Impacts</b>						
1	<p><i>Environmental and Social Assessment- Identification of Risks and Impacts</i></p> <p><i>In line with EBRD ESR1, the Projects' ESIA process took place and ESIA Report was prepared. As part of Project ESIA, Environmental and Social Management Plan (ESMP) has also been prepared. The ESMP is clear in listing the impacts, the required mitigation and monitoring measures, as well as roles and responsibilities.</i></p> <ul style="list-style-type: none"> <li>Revisit the cumulative impact assessment before construction of the project based on actual status of the additional projects connected to M3 as listed in Section 3.2 ES Appraisal table of ESR Compliance Report, Item 1.1 (e.g., consider if quantitative modelling of combined effects from other projects, e.g., on noise, generation of dust, use of materials and water) and update the ESMP as required.</li> </ul>	EBRD ESR1 EBRD ESR2 EBRD ESR3 EBRD ESR4 EBRD ESR5 EBRD ESR6 EBRD ESR8 EBRD ESR10 Best practice National legislation	Low	<ul style="list-style-type: none"> <li>Updated ESIA or associated management plans containing cumulative impact assessment and mitigation measures</li> <li>Updated Environmental and Social Management Plan (ESMP)</li> </ul>	Before construction <sup>1</sup>	NRA	Open
2	<p><i>Environmental and Social Assessment (Cont'd)</i></p> <ul style="list-style-type: none"> <li>Update the Project ESIA once the location of the camp and project</li> </ul>	EBRD ESR1 Best practice National	Medium	<ul style="list-style-type: none"> <li>Updated ESIA or associated management plans containing impacts</li> </ul>	Before construction	NRA	Open

<sup>1</sup> Before construction, is the period after the financial close and before the actual start of construction. This is often called as the Contractor mobilization phase.

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	associated facilities are known as detailed in Section 3.2 ES Appraisal, Item 1.1, and update Project ESMP.	legislation		from the known location of camps and project associated facilities <ul style="list-style-type: none"> <li>Updated ESMP</li> </ul>			
3	<p><i>Environmental and Social Management System</i></p> <ul style="list-style-type: none"> <li>Develop and implement a comprehensive Environmental and Social Management System (ESMS), including environmental and social policy, that aligns with the requirements of EBRD ESR1. This system shall allow for the identification, evaluation, and mitigation of environmental and social risks of projects, as well as comply with regulatory requirements and lender environmental and social standards.</li> <li>ESMS system shall be aligned with good international practice and local E&amp;S regulations, the requirements of the ISO 14001 on Environmental Management System and commensurate with the E&amp;S risks and impacts of the project.</li> <li>Develop E&amp;S Policy defining the environmental and social objectives and principles that enable the project to achieve sound environmental and social performance. This policy should provide a framework for the</li> </ul>	EBRD ESR1 Best practice National legislation	Medium	<ul style="list-style-type: none"> <li>Project specific, integrated Environmental, Social, Health and Safety Management System in place</li> <li>Overarching Environmental and Social Policy in place</li> </ul>	Before financial close	NRA	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	environmental and social assessment and management process consistent with the principles of the EBRD ESRs.						
4	<p><i>Organizational Capacity and Commitment</i>  <i>The project shall be managed by the NRA. The actual work will be executed by an EPC contractor selected via a competitive tender procedure. The current E&amp;S organization present with NRA is sufficient to manage the E&amp;S risks in organization projects. However, it was identified that E&amp;S specialists guided by mainly national legislation requirements rather than best practices or any lender guideline. Therefore:</i></p> <ul style="list-style-type: none"> <li>• NRA E&amp;S specialists shall seek training and technical assistance to increase their understanding of EBRD ESRs and how to translate these into their operations, e.g., set the contractor E&amp;S requirements and monitoring projects that are implemented in line with the Lenders requirements.</li> <li>• This alignment training with EBRD ESRs shall go hand in hand with the development of guiding materials, in-house check lists and other tools / mechanisms that will aid efficient implementation and monitoring. It will also help NRA to cascade lenders requirements into project documentation to facilitate implementation and monitoring.</li> </ul>	EBRD ESR1 Best practice National legislation	Low	<ul style="list-style-type: none"> <li>• Project specific requirements in line with Lenders Requirements, monitoring tools and forms</li> <li>• Training records of E&amp;S specialists</li> </ul>	Before financial close	NRA	Open



No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
5	<p><i>Supply Chain Policy</i></p> <ul style="list-style-type: none"> <li>Develop Supply Chain Policy and cascade to contractors and each subcontractors.</li> <li>The NRA uses the FIDIC Red Book<sup>2</sup> as template for the contract and as legal document with its contractors. The FIDIC Red Book is not completely aligned with ESR1 and 2. Therefore, include additional clause to FIDIC Contract explicitly committing to: <ul style="list-style-type: none"> <li>Supply chain requirements (as per the financing documents)</li> <li>Measures listed in Project ESIA (2026)</li> <li>Complying with Project's ESMS and Applicable Standards</li> <li>Ensuring sufficient E&amp;S, safety and labor management personnel are present onsite.</li> <li>Right of site access of Project, the lenders and their advisors.</li> </ul> </li> <li>Include a requirement to FIDIC Contract for contractors to include risk screening of new suppliers.</li> <li>Include a clause in FIDIC Contract requiring contractors to ensure their</li> </ul>	<p>EBRD ESR1</p> <p>EBRD ESR2</p> <p>Best practice</p> <p>National legislation</p>	Medium	<ul style="list-style-type: none"> <li>Supply Chain Policy</li> <li>Updated FIDIC Contract including supply-chain management related clauses</li> </ul>	Before financial close	NRA	Open

<sup>2</sup> A standard construction contract published by the International Federation of Consulting Engineers (FIDIC), tailored for projects where the Employer provides the design and the Contractor executes the work. The standard FIDIC Red Book (2017/2022 editions) contains contractual obligations on the Contractor to address environmental, health, safety, and social matters—but it does not include detailed project-specific Environmental & Social (E&S) requirements. These need to be provided by the Employer, in this project case – the NRA.

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	primary supplies are free from child and forced labor.						
<b>ESR 2</b>	<b>Labor and Working Conditions</b>						
6	<p><i>HR Policy and Labor Management System</i></p> <ul style="list-style-type: none"> <li>Develop HR / Labor Management System. Management system should include labor procedures, contract oversight, grievance mechanism, monitoring, reporting and inspections, working condition standards, GBVH safeguards, OHS integration and supply chain controls.</li> <li>Adopt and implement the HR policy in line with national law and EBRD ESR2. HR policy and requirements shall apply to all project contractors. HR Policy shall include commitment to following: <ul style="list-style-type: none"> <li>Approach to managing the Project workforce, including third party and supply chain</li> <li>Working conditions and terms of employment</li> <li>Human rights</li> <li>Freedom of association/collective bargaining</li> <li>Child labor/forced labor</li> <li>Equal opportunities and non-discrimination</li> <li>GBVH safeguards</li> <li>Contractor management and monitoring</li> </ul> </li> </ul>	<p>EBRD ESR2</p> <p>Best practice</p> <p>National legislation</p>	Medium	<ul style="list-style-type: none"> <li>HR Policy</li> <li>Labor Management System which covers contractors and subcontractors</li> </ul>	Before financial close	NRA	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	<p>- Grievance mechanism</p> <p>Ensure that the labour policies are cascaded to all contractors.</p>						
7	<p><i>Working Conditions/Terms of Employment/Child Labor &amp; Forced Labor</i></p> <ul style="list-style-type: none"> <li>Update NRA Code of Conduct to be aligned with ESR2 and as detailed in Section 3.2, Item 2.1. of the ESIA.</li> </ul> <p>Include provisions on child and force labor prohibition, freedom of association and collective bargaining, employment terms, fair wages and working hours, grievance mechanism, supply chain and contractor compliance, worker accommodation (if applicable). Specifically, add a clause explicitly prohibiting child labor or any employment of persons under the age of 18 for Hazardous work.</p>	<p>EBRD PR2</p> <p>Best practice</p> <p>National legislation</p>	High	<ul style="list-style-type: none"> <li>Code of Conduct which contains provisions aligned with EBRD ESR2.</li> </ul>	Before financial close	NRA	Open
8	<p><i>Working Conditions/Terms of Employment</i></p> <ul style="list-style-type: none"> <li>Update NRA's existing FIDIC Contract (with third parties/contractors) to contain additional clauses explicitly stating the prohibition of child and force labor, ethical recruitment clauses (non-discrimination and equal opportunity to ensure fair and equal access to opportunities, training and wages), grievance mechanism requirements, passport/document retention prohibition, contractor obligation to</li> </ul>	<p>EBRD ESR2</p> <p>Best practice</p> <p>National legislation</p>	Medium	<ul style="list-style-type: none"> <li>Updated FIDIC Contract</li> <li>Audit report checking contractor/subcontractor compliance</li> </ul>	Before financial close	NRA	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	<p>meet ESR2 to all employees and subcontractors, supply-chain labor due diligence obligations, age-verification procedure, regular reporting and labor audits by the contractor.</p> <ul style="list-style-type: none"> <li>Develop and implement a Contractor Management Plan that guides monitoring for ongoing compliance with ESR2. The plan includes a risk review by NRA of the EPC contractor to identify the risk of any potential labour/human rights risks and issues.</li> </ul>						
9	<p><i>Labor Management System</i></p> <ul style="list-style-type: none"> <li>Develop Terms of References for Owner's Engineer to cover monitoring and compliance with ESR2 requirements. Please see Section 3.2 for details.</li> <li>Include ESR2-related labor and working-conditions monitoring responsibilities in the Owner's Engineer's Terms of Reference, including reviewing grievance records and monitoring compliance of ESRs 2 labor requirements including age verification.</li> </ul>	<p>EBRD ESR2</p> <p>Best practice</p> <p>National legislation</p>	Medium	<ul style="list-style-type: none"> <li>Project Terms of Reference for Owner's Engineer including provisions on PR2 monitoring.</li> </ul>	Before financial close	NRA	Open
10	<p><i>Collective Dismissal</i></p> <ul style="list-style-type: none"> <li>Develop a Collective Dismissal Procedure.</li> <li>Reference the procedure in the HR policy and incorporate into the Labor Management System.</li> </ul>	<p>EBRD ESR2</p> <p>Best practice</p> <p>National legislation</p>	Medium	<ul style="list-style-type: none"> <li>A Collective Dismissal Procedure aligned with PR2.</li> <li>HR Policy referencing developed</li> </ul>	Before financial close	NRA	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
				Collective Dismissal Procedure.			
11	<p><i>Grievance Mechanism</i></p> <ul style="list-style-type: none"> <li>Develop a worker/labor grievance mechanism and grievance register as part of the Labor Management System.</li> <li>Worker grievance mechanism to be available to all workers including contractor workers and communicated to all workers as well as contractor and sub-contractor workers. Consideration to be given to the handling of sensitive grievances.</li> <li>The grievance mechanism will include specific provision for cases of Gender Based Violence and Harassment, including appropriate resources, mechanisms and controls.</li> <li>Ensure that NRA has access and receives a copy of the contractor workers' grievance mechanism. In case of discrepancy, NRA's grievance mechanism shall be followed to resolve the grievances.</li> </ul>	<p>EBRD ESR2</p> <p>Best practice</p> <p>National legislation</p>	Medium	<ul style="list-style-type: none"> <li>An accessible and anonymous grievance redress mechanism</li> <li>Grievance records are lodged in register.</li> <li>Review records of contractor GM records and follow Project' approved GM in case of discrepancy</li> </ul>	Before financial close	NRA	Open
12	<p><i>Accommodation</i></p> <ul style="list-style-type: none"> <li>The Project shall ensure that the EPC establishes worker accommodation in line with EBRD/ IFC guidelines on Workers' Accommodation: Processes and Standards.</li> <li>Undertake an audit of the project-</li> </ul>	<p>EBRD ESR2</p> <p>EBRD ESR3</p> <p>Guidance note on worker's accommodation published by EBRD/IFC</p>	Medium	<ul style="list-style-type: none"> <li>Undertake contractor labour performance as part of the selection process</li> <li>Internal audit records for</li> </ul>	Before construction and quarterly accommodation audits during construction	NRA	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	provided worker accommodation facilities prior to occupancy, followed by quarterly audits thereafter.	(Worker's Accommodation: Processes and Standards) Best practice National legislation		worker's accommodation in line with EBRD/IFC Guidance Note: "Checklist on Workers' Accommodation"			
<b>ESR 3</b>	<b>Resource Efficiency and Pollution Prevention and Control</b>						
13	<p><i>Resource Efficiency</i></p> <p><i>Due to the stage of the project development, resource efficiency is not addressed in the ESIA. Therefore, following actions are proposed:</i></p> <ul style="list-style-type: none"> <li>• Project shall identify opportunities and alternatives for resource efficiency relating to the project in accordance with PR3 and best practices. The potential cumulative impacts of water abstraction upon third party users and local ecosystems should be assessed and demonstrate that the Project's water supply will not have adverse impacts on water resources.</li> <li>• Include requirements for resource efficiency in the ESMP and construction management plans, focusing on water recycling and water efficiency measures (due to water scarcity in the country especially in the summer periods).</li> </ul>	EBRD ESR3 Best practice	High	<ul style="list-style-type: none"> <li>• Updated ESMP</li> <li>• Contractor ESMP to include requirements for resource efficiency</li> </ul>	Before construction	NRA	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
14	<p><i>Pollution Prevention and Control - Air and noise emissions (Cont'd)</i></p> <p>ESIA process shall determine the appropriate pollution prevention and control methods, technologies and practices to be applied to the Project</p> <ul style="list-style-type: none"> <li>• Install mobile noise absorbing panels during construction and fixed noise absorbing panels during operation phase of the project as included in the ESIA, Annex 5.8 (proposed locations and specifications of the panels) and section 6.1.4 of the ESMP.</li> <li>• It is recommended that the proposed mitigation measures are included in the final detailed design and the suggested approach for locations and panel specifications, is verified via a final acoustic modelling.</li> <li>• .Ambient air quality, noise levels, water and soil sampling is foreseen during pre and peak of the construction as stated in the ESIA chapter 8 Monitoring and Supervision. Ensure sampling is representative to the scale of the project/works and considering the location of sensitive receptors. (<i>Please see ESR Compliance Assessment Report, Section 3.2, KPI Ref. 3.2 Pollution Prevention and Control for proposed parameters, locations and duration.</i>)</li> <li>• The proposed sampling methodology shall comply with ESR3.</li> </ul>	<p>EBRD ESR3</p> <p>Best practice</p> <p>National legislation</p>	Medium	<ul style="list-style-type: none"> <li>• Noise absorbing panels installed</li> <li>• Sampling undertaken and methodology aligned with PR3</li> <li>• Updated ESMP</li> </ul>	Before construction	NRA	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	<ul style="list-style-type: none"> <li>Based on the outcome of measurements, revisit Project ESMP and update if any additional mitigation measures are needed.</li> </ul>						
15	<p><i>Pollution Prevention and Control - Waste waters</i></p> <ul style="list-style-type: none"> <li>The Project shall apply pollution prevention and control techniques consistent with the mitigation hierarchy approach to minimise potential adverse impacts. Evaluate the wastewater related impacts from the worker camp and associated facilities once the final location is known.</li> <li>Update the ESIA or associated management plans and ESMP based on the wastewater related impacts relevant to workers' camp and associated facilities.</li> </ul>	EBRD ESR3 Best practice	Medium	<ul style="list-style-type: none"> <li>Updated ESMP containing wastewater related measures for workers' camp and associated facilities</li> </ul>	Before construction	NRA	Open
16	<p><i>Pollution Prevention and Control – Soil</i></p> <ul style="list-style-type: none"> <li>Update the ESIA or associated management plans and ESMP based on the soil management related impacts relevant to workers' camp and associated facilities.</li> </ul>	EBRD ESR3 Best practice	Medium	<ul style="list-style-type: none"> <li>Updated ESIA or associated management plans and ESMP</li> </ul>	Before construction	NRA	Open
17	<p><i>Greenhouse Gases</i></p> <ul style="list-style-type: none"> <li>Project shall consider alternatives and implement technically and financially feasible and cost-effective options to avoid or minimise project-related greenhouse gas (GHG) emissions during the design, construction and operation phases.</li> </ul>	EBRD ESR3 Best practice National legislation	Medium	<ul style="list-style-type: none"> <li>GHG Assessment</li> <li>Annual GHG emission reporting to EBRD</li> </ul>	<ul style="list-style-type: none"> <li>Before road exploitation</li> <li>Operation phase</li> </ul>	NRA	Open



No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	<ul style="list-style-type: none"> <li>Undertaking GHG calculation scope as GHG calculations are missing in ESIA.</li> <li>The current GHG emissions threshold is above: <math>\geq 20,000</math> tCO<sub>2</sub>e/year and reporting will be required during operation phase.</li> <li>In line with ESR3 requirements, the Project shall quantify GHG emissions in accordance with EBRD Methodology for Assessment of Greenhouse Gas Emissions (annually) and report to the EBRD.</li> </ul>						
18	<p><i>Water Demand and Surface Water Protection</i></p> <ul style="list-style-type: none"> <li>The impact of technical water demand on water availability for neighbouring communities shall be re-assessed before start construction.</li> </ul>	EBRD ESR3 Best practice National legislation	Medium	Updated ESMP	Before construction	NRA	Open
19	<p><i>Waste Management</i></p> <ul style="list-style-type: none"> <li>Project shall avoid or minimize minimise the generation of hazardous and non-hazardous waste materials and reduce their harmfulness as far as practicable. Measures are included in the ESMP in detail.</li> <li>The Project shall ascertain whether licensed disposal sites are being operated to acceptable standards in line with PR3. In order to meet this:</li> <li>Undertake an independent audit of the existing waste facilities that will be employed by the EPC for waste disposal to ensure these have</li> </ul>	EBRD ESR3 Best practice National legislation	Low	<ul style="list-style-type: none"> <li>Audit records to existing waste facilities</li> <li>Waste records produced and kept for the complete duration of the construction phase.</li> <li>Updated ESMP</li> </ul>	Before construction	NRA	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	<p>sufficient capacity and proper facilities for waste treatment/disposal.</p> <ul style="list-style-type: none"> <li>Update ESMP if any additional measures should need to be taken.</li> </ul>						
<b>ESR 4</b>	<b>Health, Safety and Security</b>						
20	<p><i>Hazardous Materials Safety</i> The Project shall apply appropriate risk management measures in order to minimise or control the release of such substances/materials into air, water and/or land resulting from their production, transportation, handling, storage, use and disposal relating to project activities. ESIA provides sufficient requirements for the operational health and safety and use of chemical substances. Additional measures are listed in ESMP, existing Occupational Health and Safety Management Plan, Pollution Prevention Management Plan, Emergency Response Plan, and Waste Management Plan. These shall be applied by the project and expanded going forward. Therefore:</p> <ul style="list-style-type: none"> <li>Add the requirement for keeping Materials Safety Data Sheets (MSDS) for all hazardous substances on-site.</li> <li>Add training of workers on MSDS content.</li> <li>Include the requirement for the use of MSDS in the Contractor's Environmental and Social</li> </ul>	<p>EBRD ESR3 EBRD ESR4 Best practice National legislation</p>	Medium	<ul style="list-style-type: none"> <li>Evidence of warning/notification for the requirement of MSDS for all hazardous substances to be placed on site</li> <li>Training of workers on MSDS content</li> <li>Contractor's ESMP include requirement to use MSDS</li> </ul>	Before construction	NRA	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	Management Plan (C-ESMP).						
21	<p><i>Natural Hazards</i>  <i>In line with ESR4, the Project identified the potential impacts and risks caused by natural hazards, such as earthquakes, landslides or floods and ESIA Report proposed adaptation measures to reduce impacts caused by climate change. The ESIA however lacks a dedicated climate risk assessment, e.g., hazard analysis and vulnerability assessment. Therefore:</i></p> <ul style="list-style-type: none"> <li>• Apply EBRD climate risk screening tool or equivalent to undertake a climate change risk assessment during the detailed design of the project.</li> </ul>	EBRD ESR4 Best practice National legislation	Medium	<ul style="list-style-type: none"> <li>• Climate Change Risk Assessment (CCRA) using EBRD climate risk screening tool</li> <li>• Updated ESMP</li> </ul>	Detailed Design Phase Before construction	NRA	Open
22	<p><i>Project specific management plans in line with ESR 4 to manage community and workers health and safety</i></p> <p>a) The Project shall update the Emergency Response Plan, based on detailed design and latest project information and assessments to:</p> <ul style="list-style-type: none"> <li>- Introduce quantified triggers (e.g., spill volumes, injury severity, fire size, environmental release thresholds) that escalate from site-level to multi-agency level and the corresponding response procedure,</li> <li>- Ensure MSDS are used to determine actions in the spill response plan,</li> <li>- Define the type of drills that needs</li> </ul>	EBRD ESR4 Best practice National legislation	Medium	Updated ERP based on the project ESIA Operational Health and Safety Plan Community Health and Safety Plan Traffic Management Plan	Before construction	NRA	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	<p>to be conducted per risk and the corresponding KPIs to recorded and monitored.</p> <ul style="list-style-type: none"> <li>- Coordinate with local authorities and public emergency services to share the Project ERP.</li> <li>- Set out a structured community communication plan for emergency alerts (multi-channel warnings, languages), safe assembly areas, or post-incident updates especially when the works will be conducted in close vicinity to the residential houses,</li> <li>- Define the drills that need to be conducted together with the community, depending on the risk type and level.</li> </ul> <p>b) Develop project specific Occupational Health and Safety Plan in line with ESR 4</p> <p>c) Develop project specific Community Health and Safety Plan in line with ESR 4</p> <p>d) Develop project specific Traffic Management Plan in line with ESR 4</p>						
<b>ESR 5</b>	<b>Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</b>						
23	<p><i>Avoid or minimize displacement</i></p> <p>The Project shall consider feasible alternative project designs to avoid or at least minimise physical and/or economic displacement, while balancing environmental, social, and economic</p>	<p>EBRD ESR5</p> <p>Best practice</p> <p>National legislation</p>	Medium	<ul style="list-style-type: none"> <li>Assessment identifying any Gaps with regards to compensation in line with EBRD PR 5</li> </ul>	Before financial close	NRA to appoint an independent consultant to conduct independent	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	<p>costs and benefits. The Project sought to avoid displacement wherever possible; however, some economic displacement was unavoidable due to the need to upgrade and extend an existing road as detailed in ESR Compliance Assessment Report, Section 2.5 and Section 3.2, KPI Ref. 5.1.</p> <ul style="list-style-type: none"> <li>NRA to appoint an independent resettlement consultant with appropriate experience of working with lender requirements to conduct the independent audit assessment of the Lot 2 land acquisition during phase 1 against the ESR5 requirements to assess: <ul style="list-style-type: none"> <li>Whether the compensation of the land acquired in 2019 meets EBRD requirements,</li> <li>The nature and scale of the impact of land acquisition,</li> <li>Whether all compensation has been paid in line with EBRD PR 5 , and</li> <li>Whether there are any outstanding grievances or disputes in relation to land acquisition, among others.</li> </ul> </li> </ul>			<ul style="list-style-type: none"> <li>Corrective actions as outcome of stand-alone assessment in Lot 2.</li> </ul>		assessment.	
24	<p><i>Avoid or minimize displacement / Resettlement Action Plan and Land Acquisition Resettlement Plan</i></p> <ul style="list-style-type: none"> <li>NRA to appoint an independent resettlement consultant with appropriate experience of working with lender requirements to develop and</li> </ul>	<p>EBRD ESR5</p> <p>Best practice</p> <p>National legislation</p>	Medium	<ul style="list-style-type: none"> <li>RAP developed identifying all Project-Affected Persons (PAPs) and defining compensation at full replacement</li> </ul>	Before construction	NRA to appoint independent consultant to develop and implement.	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	<p>implement the project specific Resettlement Action Plan based on the Land Acquisition and Resettlement Framework (LARF) document developed for this project in 2025 (by Haskoning). This action plan shall outline the general principles, procedures and entitlement framework consistent with ESR5.</p> <ul style="list-style-type: none"> <li>The scope and level of detail of the RAP shall vary with the magnitude of displacement and the complexity of the measures required to mitigate adverse impacts. In all cases, it will describe the ways and means by which the objectives of PR5 being fulfilled.</li> </ul>			<p>cost.</p> <ul style="list-style-type: none"> <li>PAPs compensated fairly in accordance with RAP provisions prior to taking possession of the land.</li> </ul>			
25	<p><i>RAP&amp;LARF documentation</i></p> <ul style="list-style-type: none"> <li>Project shall conduct socio-economic census/survey to support RAP document to be developed for alignment with PR5.</li> <li>Confirm a clear cut-off date for eligibility has been established.</li> <li>Conduct vulnerability assessment as part of the RAP considering the social profile of the community</li> <li>Identify and propose mitigation measures based on the vulnerability assessment as part of RAP.</li> </ul>	<p>EBRD ESR5</p> <p>Best practice</p> <p>National legislation</p>	Medium	<ul style="list-style-type: none"> <li>Socio-economic census/survey records</li> <li>Cutoff date communication records</li> <li>Vulnerable groups identified as part of the RAP</li> <li>Records of implementation of appropriate mitigation measures.</li> </ul>	Before construction	NRA to hire independent consultant	Open
26	<p><i>Compensation for Displaced Persons</i></p> <ul style="list-style-type: none"> <li>Land cannot be taken prior to the</li> </ul>	<p>EBRD ESR5</p> <p>Best practice</p>	Medium	<ul style="list-style-type: none"> <li>PAPs compensated fairly in</li> </ul>	Before construction	NRA	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	provision of compensation and other entitlements. <ul style="list-style-type: none"> <li>• Compensation is to be paid to all eligible landowners and users as per lender standards prior to taking possession of the land.</li> </ul>	National legislation		accordance with RAP provisions prior to taking possession of the land. <ul style="list-style-type: none"> <li>• Completion of compensation records</li> </ul>			
27	<i>RAP&amp;LARF Monitoring</i> <ul style="list-style-type: none"> <li>• Develop procedure and tools to ensure that monitoring and external reviews are scheduled to track RAP/LRP success.</li> <li>• Schedule independent external reviews to track the long-term success of RAP&amp;LARF.</li> </ul>	EBRD ESR5 Best practice National legislation	Medium	<ul style="list-style-type: none"> <li>• Reporting of findings and corrective actions.</li> <li>• Records of external reviews</li> </ul>	Before construction	NRA	Open
28	<i>Funding/Budgeting</i> <ul style="list-style-type: none"> <li>• Confirm budget includes top-up for full replacement costs.</li> <li>• Additional budget will need to be secured to meet lender requirements under ESR 5</li> </ul>	EBRD ESR5 Best practice National legislation	Medium	All PAPS are compensated at full replacement cost.  Additional budget secured to meet ESR 5 requirements	Before construction	NRA	Open
<b>ESR 6</b>	<b>Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>						
29	<i>Assessment of Biodiversity and Living Natural Resources (cont'd)</i> <ul style="list-style-type: none"> <li>• The proposed biodiversity measures in the ESIA shall be further elaborated and made obligatory where needed, especially once the construction camp,</li> </ul>	EBRD ESR6 Best practice National legislation	Medium	Biodiversity Management Plan	Before construction	NRA	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	<p>work roads and other locations are known as well associated facilities.</p> <ul style="list-style-type: none"> <li>The detailing of the proposed mitigation actions shall be done by an ecologist based on and latest project insights and must be agreed upon before actual start of interventions and included in a Biodiversity Management Plan (to be reviewed and agreed by the Lenders E&amp;S Advisor on compliance with ESR6).</li> <li>Biodiversity monitoring shall continue during the construction phase of the project. If biodiversity monitoring identifies possible effects or risks for fauna and flora, identify suitable measures to avoid and reduce the risk, e.g., if nesting birds are found that might be disturbed by the project, the construction must be put in hold until after the hatching or the disturbing activities should be done after or before the sensitive period.</li> <li></li> </ul>						
<b>ESR 8</b>	<b>Cultural Heritage</b>						
30	<p><i>Assessment and Management of Impacts on Cultural Heritage</i></p> <p><i>Most of the roadworks shall be carried out on an existing road corridor whereby there are no cultural heritage sites located. The ESIA identifies cultural and memorial sites along the road corridor but</i></p>	<p>EBRD ESR8</p> <p>Best practice</p> <p>National legislation</p>	Negligible	<ul style="list-style-type: none"> <li>Records of chance find entries (if any)</li> <li>Official notification to authorities in line with Chance Find Procedure</li> </ul>	<ul style="list-style-type: none"> <li>Before construction</li> <li>During construction</li> </ul>	NRA	Open



No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	<p><i>confirms that there is no direct physical interference between these sites and construction works.</i></p> <ul style="list-style-type: none"> <li>The Project shall ensure that the EPC Contractor responsible for civil works shall prepare and implement a Chance Finds Procedure for the Project. This procedure shall be designed to address any potential discoveries of new cultural heritage elements during the construction phase and ensure appropriate measures are taken in response.</li> </ul>						
<b>ESR 10</b>	<b>Information Disclosure and Stakeholder Engagement</b>						
31	<p><i>Stakeholder Engagement Plan</i></p> <p><i>In line with ESR10, Project specific Stakeholder Engagement Plan (SEP) appropriate to the nature and scale or the risks, impacts and development stage of the project was developed within the scope of ESIA process and Moldovan legislation. The SEP includes stakeholder identification, defines engagements principles and methods, establishes a Grievance Redress Mechanism procedure, outlines the roles and responsibilities for the implementing agencies and monitoring indicators. Although official GRM is in place, the mechanism was observed as a general procedure rather than Project-specific grievances. Therefore:</i></p>	<p>EBRD ESR10</p> <p>Best practice</p> <p>National legislation</p>	Medium	<ul style="list-style-type: none"> <li>Updated SEP</li> </ul>	<ul style="list-style-type: none"> <li>Before construction</li> <li>During construction</li> <li>During operation</li> </ul>	NRA	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	<ul style="list-style-type: none"> <li>Update SEP regularly including any records of stakeholder engagements.</li> </ul>						
32	<p><i>Grievance Redress Mechanism (GRM)</i></p> <ul style="list-style-type: none"> <li>Develop Project-specific Grievance Redress Mechanism Procedure as outlined in ESR10 and disclose with community and local authorities and make accessible to them.</li> <li>Implement and communicate project specific GRM. Ensure that priority is given, and resources allocated, to implement stakeholder engagement and communication activities.</li> </ul>	EBRD ESR10 Best practice National legislation	Medium	<ul style="list-style-type: none"> <li>Record of engagements and grievances</li> <li>A documented GRM procedure outlining the mechanism and resolution timeframe.</li> <li>Register evidencing taken actions to resolve grievances</li> </ul>	<ul style="list-style-type: none"> <li>Before construction</li> <li>During construction</li> <li>During operation</li> </ul>	NRA	Open
33	<p><i>Information Disclosure</i></p> <p><i>The Project shall involve PAPs at the earliest stages and through all resettlement activities, including host communities in line with PR10:</i></p> <ul style="list-style-type: none"> <li>ESIA/LARF/SEP disclosure and consultation to be undertaken for all 4 lots.</li> <li>Communicate Project specific Grievance Redress Mechanism (GRM) channel and procedure with community.</li> <li>The Project shall ensure that the ESIA and associated documents and plans remain available for consultation in the</li> </ul>	EBRD ESR10 Best practice National legislation	Medium	<ul style="list-style-type: none"> <li>Records of ESIA/LARF disclosure and consultation for all 4 lots.</li> <li>Records of consultation and feedback received.</li> <li>Updated/maintained ESIA documents package</li> </ul>	<ul style="list-style-type: none"> <li>Before construction</li> <li>During construction</li> <li>During operation</li> </ul>	NRA	Open

No.	Action	Applicable Standards	Risk Classification	Target and Evaluation Criteria	Deadline	Responsibility	Status
	public domain for the life of the Project, including any supplements, additions and updates to the ESIA disclosure package.						

Table 1-2: Environmental and Social Action Plan for the Project