

# **RUISI WIND POWER PROJECT**

## **ENVIRONMENTAL AND SOCIAL ACTION PLAN**

### **Abbreviations and terms:**

The "Applicable E&S Requirements" means the national legislation, the international conventions/treaties ratified by Georgia, and the EBRD's 2019 E&S Policy

Early works/activities: All kind of Project activities undertaken before financial close

EBRD: European Bank for Reconstruction and Development

E&S: Environmental & Social

ESIA: Environmental and Social Impact Assessment

ESMS: Environmental & Social Management System

CESMP: Construction Environmental & Social Management Plan

GIS: Geographic Information System (software)

Lenders Requirements: the EBRD 2019 Performance Requirements.

PR: Performance Requirements (as defined by EBRD)

RAP: Resettlement Action Plan

SEP: Stakeholder Engagement Plan

Year 1, Year 2, etc: calendar year (Jan 1st to Dec 31st) starting after the financing agreement with EBRD is signed (Year 0).

Project implementation arrangements:

The planned implementation arrangements are recalled hereafter for the ease of the ESAP reader:

- Peri is the Sponsor of the project
- The projects will be owned and operated by Peri, through a SPV named JSC Wind Power.
- Civil Works will be done directly by Peri as a construction company (named "Peri Construction" in the ESAP). Wind turbines will be supplied and built as turn-key projects by a separate contractor.

No.	Action	E&S Risks	Requirement	Responsibility	Timetable	Target and Implementation Criteria
1.1	<b>E&amp;S Manager</b> Appoint an E&S Manager for the early activities, main construction and operation phases, responsible for the Project compliance with the national legislation and Lenders Requirements, and in charge of organizing the implementation of the ESAP actions. The E&S Manager will directly report to JSC Wind Power's Project Manager.	E&S requirements implementations	PR1	JSC Wind Power	<b>1.Before EBRD Board approval</b>  2.Early activities, construction and operation	1.Responsibility assigned. Name and contact of the responsible person provided to EBRD.  2.Position maintained
1.2	<b>E&amp;S Management: early activities</b> Prepare an Early Activities CESMP ("EA-CESMP"), including (i) a description of the early activities and contract arrangements, (ii) a register of all environmental, social and health & safety risk for the early activities period, and corresponding mitigation measures to meet the Lenders Requirements following the mitigation hierarchy, and (iii) a mechanism for the effective enforcement and monitoring of the EA-CESMP implementation across the chain of the contractors and subcontractors involved in the early work. The CESMP must be consistent with the ESIA disclosure package. Quarterly reporting to lenders on the EA-CESMP implementation.	Preventive action to ensure compliance of early activities with PRs and PSs	PR1	JSC Wind Power E&S manager, eventually with support from a consultant	Before mobilisation on site, before impact and before construction permit	EA-CESMP prepared, implemented and monitored. Early activities compliant with PRs and PSs. Quarterly monitoring report provided to the lenders.
1.3	<b>ESMS: construction period</b> Based on an E&S policy aligned on EBRD E&S policy and signed by the Sponsor's top management, establish an ESMS for the implementation of the construction activities. The ESMS shall include procedures for the management of design change and for the management of non-compliances, as well as an E&S monitoring mechanism.	E&S management system	PR1 Good Int. Practices	JSC Wind Power E&S manager, eventually with support from a consultant	ESMS prepared before the commencement of construction works.  ESMS run throughout early activities, construction and commissioning.	ESMS established and run by the E&S manager
1.4	<b>ESMS: operation period</b> Develop and run an environmental and social management system (structured according to ISO9001 –14001 standards) for the operation period. The ESMS shall include the E&S policy mentioned in action 1.3, public and occupational H&S procedures, procedures for ESAP implementation and change or non-compliances management, and an E&S monitoring mechanism.	E&S management system	PR1 Good Int. Practices	JSC Wind Power E&S manager, eventually with support from a consultant	ESMS prepared and E&S organisation in place: before operation. Implementation: during operation	ESMS prepared and implemented.

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1.5	<p><b>Consolidated ESMMP preparation and implementation</b> Based on the ESIA EMP, on the detailed design, on the permitting authority requirements and on the ESAP, mobilize a reputable and experienced consultant to prepare a consolidated E&amp;S Management and Monitoring Plan (ESMMP) for the construction and operation periods. Include in the ESMMP general and detailed maps with all required land takes: roads widening, platforms, WTGs, Substations, Transmission line footprint and easement, etc...</p> <p>The ESMMP must include a stand-alone section that "E&amp;S specifications for contractors" that defines the contractor's obligations throughout the early-activities, construction and operation, as required by the Project's E&amp;S documents, including the ESAP. The "E&amp;S specifications for contractors" must be included in the contractor's contractual obligations. Organize/monitor their effective implementation</p>	ESMMP implementation	Georgia law PR1	JSC Wind Power E&S manager + JSC Wind Power's person in charge of contractors contracts preparation, with support from the E&S manager	1.Before the commencement of construction works. 2.Before contractors mobilization 3.During construction and operation	1.Consolidated ESMMP prepared, approved by EBRD and ready for implementation 2.Inclusion of "E&S specifications for contractors" in contractors contracts. 3. Implement the ESMMP, and report on its effective implementation to EBRD
1.6	<p><b>E&amp;S performance for the construction period</b> In addition to action 1.5, include in each contractor's binding documentation a general obligation (i) to meet EBRD PRs, (ii) to implement corrective actions required by the Lenders in relation to compliance with EBRD PRs, and (iii) to cascade these requirements through the contractor's sub-contractor's chain.</p>	E&S requirements implementations	Georgia law PR1	JSC Wind Power's person in charge of contractors contracts preparation	Before contract signature with contractors.	Contractor's obligations as per the EA-CESMP and ESMMP are met. Corrective actions required by lenders are implemented.
1.7	<p><b>Peri Construction's HSEMP and management system</b> Peri Construction to prepare, submit to EBRD's non-objection and implement a Health, Safety and Environment Management Plan (HSEMP) covering the PR2, PR3 and PR4 E&amp;S risks related to the construction and commissioning activities under Peri Construction's direct control. The organization for the implementation of the HSEMP must be described in the ESMS (Action 1.3).</p>	Compliance with applicable requirements	Georgia law PR1	E&S manager, eventually with support from a consultant	During construction	HSEMP prepared and implemented by Peri, non-objectioned by EBRD
1.8	<p><b>Contractors HSEMP and management system</b> In a contractually binding manner, require each contractor to, as most practical, (i) adhere to Peri Construction's HSEMP (limited to small and non-specialized contractors only) or (ii) prepare, submit to Peri Construction's review and implement its own Health, Safety and Environment Management Plan (HSEMP) covering the PR2, PR3 and PR4 E&amp;S risks related to the construction and commissioning activities under the contractor's direct control. Request contractually each contractor to have a management system in place to ensure the effective implementation of the HSEMPs.</p>	Compliance with applicable requirements	Georgia law PR1	JSC Wind Power	During construction and for maintenance / rehabilitation works	HSEMP prepared and implemented by contractors, approved and monitored by Peri E&S manager

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1.9	<p><b>E&amp;S responsibility assigned to Contractors</b> Request contractually each contractor to appoint an E&amp;S Officer, with the responsibility to organize the implementation of the E&amp;S actions that fall under the contractor's responsibility (Action 1.5) of the contractor's HSEMP (action 1.8) and to ensure the compliance of the contractor's activities with the Lenders Requirements (Action 1.6).</p>	Compliance of construction activities; effective implementation of the ESMMP actions under the responsibility of contractors.	Georgia law PR1	Each contractor, on JSC Wind Power request	Before starting on-site activities.	E&S officer designated, acting in direct contact with the E&S manager as per the Project's ESMS.
1.10	<p><b>Regular reporting to lenders</b> E&amp;S Monitoring reports to Lenders and guarantor. The standard EBRD E&amp;S reporting template can be used and adjusted to meet this requirement.</p>	Regular lenders monitoring process	PR1	JSC Wind Power E&S manager	every six months during construction and every year during operation	Reports issued and opined by lenders
1.11	<p><b>Code of conduct</b> Provide to Peri Construction workers (and request all contractors to provide to their workers) a code of conduct, and an induction training on local customs and misbehaviours to be avoided, including awareness raising on sexually transmissible diseases and community interactions aligned with GIP and communicated in a way that is culturally appropriate for Georgia.</p>	Prevention of issues or conflict caused by intentional or unintentional misbehaviours	PR1	JSC Wind Power E&S manager	Code of conduct and induction material ready before first disbursement. Training and induction of all new workers across construction and operation.	Code of conduct and induction material prepared and updated when necessary. Training and induction of all workers hired by Peri or by contractors.
1.12	<p><b>Wind farm layout definition procedure</b> Provide EBRD with a written procedure explaining how the final layout of the windfarm will be defined, while meeting (i) the EBRD/ and IFC General and Windpower EHS guidelines (notably with regards to the potential sources of impacts that might affect the project layout: requirements for birds and bats, noise, flicker effect, cultural heritage sites and visual impacts) and (ii) the Project's commitment not to have any involuntary impact on land or livelihoods and to undertake 100% prior and amicable negotiations.</p>	Project definition and optimization	PR1	JSC Wind Power Project manager, in liaison with technical and E&S teams	<b>Before EBRD Board approval</b>	Robust procedure and EBRD's non-objection
1.13	<p><b>Land entry procedure</b> Prepare, communicate to all contractors and enforce contractually the implementation of a land entry procedure before entering new work areas. The procedure shall include a delineation (on-site, readily visible) of (i) sensitive environmental/cultural heritage features to be protected from any entry, and (ii) areas that have been acquired / leased by the Project and can be entered. Workers must explicitly not be allowed to enter sites that are protected or not acquired/leased.</p>	Prevention of environmental and social damages from inconsiderate land use.	PR1	JSC Wind Power E&S manager and contractors E&S officer	Procedure ready before the commencement of construction works.	Procedure implemented. No works undertaken outside authorized areas.

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1.14	<p><b>Supply route E&amp;S risks management</b> Require the wind turbines supplier to provide a Supply Route Management Plan, aimed at ensuring that wind turbines are supplied in compliance with EBRD PRs and the National Legislation. The Plan's scope is from the Black Sea Port to the storage sites inside the Windfarm perimeter. The Plan must address occupational and communities' safety, traffic and communities disturbance minimization. The Plan will be consulted and implemented in coordination with the competent traffic authorities and will be subject to JSC wind power review and approval.</p>	E&S requirements application to the supply route	Georgia law PR1	JSC Wind Power E&S manager in coordination with JSC Wind Power's person in charge of contractors contracts preparation	Plan prepared, coordinated with local authorities, approved by Peri before supply from the Black Sea harbour starts..	<p>Supply route managed in compliance with national obligations and lenders requirements.</p> <p>Avoidance/minimization of accident risks and disturbances to the public.</p>
1.15	<p><b>Lender's E&amp;S Advisor (LESA)</b> The Lender shall select a reputable and internationally experienced consultant to monitor (i) the effective implementation of the ESAP and (ii) the compliance of the Project with the Applicable E&amp;S Requirements. Selection of E&amp;S Advisor by JSC "Wind Power" requires Lender's approval.</p>	Effective implementation of E&S commitments	Georgia law PR1	JSC Wind Power E&S manager	<p><b>1.Before execution of the loan agreement</b></p> <p>2.Within one week after financial close</p>	<p>1.ToR approved and consultant selected</p> <p>2.Consultant contracted by the Lender.</p>
2.1	<p><b>HR policy and procedures</b> Prepare and disclose to workers a HR policy aligned on and covering all Lenders PR2 Requirements. The HR policy will cover and ensure compliance with the relevant requirements for the following: (i) working relationships; (ii) workers' rights and obligations; (iii)wages, benefits and conditions of work; (iv) non-discrimination and equal opportunity, gender-based violence and harassment; (v) prevention of child labour and forced labour; (vi) freedom of association and right to collective bargaining; (vii) workers accommodation. It should also be accessible to workers at any time in their local language including a workers grievance mechanism. Provide the HR policy to contractors with a contractual obligation to apply the policy at their level and across their sub-contractors' chain (during both the construction and operation phases). The HR policy must cover working relationships, non-discrimination and equal opportunity, workers' rights, wages, benefits and conditions of work, as well as GBVH (Gender Based Violence and Harassment). It must also refer to the workers grievance mechanism.</p>	Improved human resources practices and compliance with National legislations and PR2 requirements	PR2 ILO standards National legislation	JSC Wind Power E&S manager	<p>1.As part of the recruitment process and before the commencement of construction</p> <p>2.Throughout construction and operation</p>	<p>1.HR Policy and Procedures prepared and contractually enforced through (sub)contractors' chains</p> <p>2.HR Policy implementation</p>
2.2	<p><b>Illegal / informal employment</b> Conduct monthly unannounced and random HR audits of contractors and subcontractors to chase any form of illegal employment.</p>	Avoidance of illegal / informal employment	National legislation	JSC Wind Power	Construction (early activities and construction) and commissioning period	HR monitoring to be conducted and reported in construction reports to lenders. Eviction of contractors found non-compliant twice.

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2.3	<b>Worker's grievance mechanism</b> Prepare and run a grievance mechanism accessible to all workers (directly or indirectly employed to work on the Project). Inform workers about the grievance mechanism during induction (see Action 1.11).	Management of potential workers grievances	PR2	JSC Wind Power E&S manager	As part of the recruitment process and before the commencement of construction  Implementation throughout construction and operation	Grievance mechanism in place. Workers informed at induction stage.
2.4	<b>Security personnel</b> Security personnel hired for the construction or operation periods must be subject to a training based on the UN Voluntary Principles on Security and Human Rights.	Mitigation of risks related to non-employee security personnel	PR2	JSC Wind Power E&S manager	throughout construction and operation	Security personnel trained prior to mobilisation.
2.5	<b>Workers' commuting or accommodation</b> The Project will provide workers with (i) transport (or a transport bonus) for local workers more than 4 km from the worksites or (ii) on-site accommodation meeting the requirements of EBRD/IFC guidance for workers accommodation (see also ESAP action 4.1).	Avoidance of improper worker's accommodation and transportation	PR2	JSC Wind Power/contractors	Throughout construction and operation	Local workers provided with transportation/proper accommodation
2.6	<b>Local Employment</b> Prepare a transparent procedure for the recruitment of local workers by Contractor and its subcontractors. Consult the local authorities before finalizing the procedure and implement it.  Monitor local employment based on data provided by contractors. Distinguish men/women and their origin: local (Ruisi, Urbnisi, Dirbi, Bretis Meurneoba, Sasireti, Dzlevijvari, Breti, Sagholasheni, and Bebnisi), Georgia or international.	Management and monitoring of Local Employment	PR2 GIP	JSC Wind Power/Contractors	Throughout construction and operation	Workers from project affected communities employed
3.1	<b>Erosion control</b> Include in the CESMP requirements for erosion control actions, including a comprehensive set of measures to manage and monitor (during at least two years after works completion) earthworks, temporary sites, topsoil and reinstatement works in a way that avoids or minimize the risk of uncontrolled erosion or sediments dispersion. Implement the plan directly or through contractors.	Prevention of uncontrolled sediments transport and erosion processes.	PR3	JSC Wind Power E&S manager	Plan prepared and implemented for construction starting from early activities. Plan updated for the operation phase operation.	Erosion controlled; temporary sites reinstated.
3.2	<b>Turbine oil spills</b> To avoid any pollution caused by lubricants leaks, design the production units so that any unexpected lubricant leak is collected and retained, or use biodegradable / non-toxic lubricants.	Prevention of uncontrolled oil leaks to the environment during operation.	PR3	JSC Wind Power's person in charge of contractors contracts preparation	Design and supply stages.	Requirement included in supplier/designer specifications and contract. Toxic / polluting oil leaks avoided.

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3.3	<b>Disturbances to public facilities and activities</b> Identify sensitive public building (hospitals and health facilities, schools, cult and religious sites, police, defence) and activities (market days, school transport routes...) located in the vicinity of the project worksites and consult them on the disturbance minimization measures put in place to control noise, dust and traffic, and minimize accident risks. Inform the persons in charge of such public buildings/activities about the stakeholder engagement tools and grievance mechanism. Require construction and transport companies to implement the agreed disturbance minimization measures.	Prevention of disproportionate disturbance.	PR3	JSC Wind Power E&S manager	Construction.	Public buildings and activities managers consulted, disturbance minimization actions agreed and implemented by construction and transport companies involved in the Project..
3.4	<b>Pesticides ban</b> Ban the use of herbicides during the construction and operation period. Mechanical removal of plants only is authorized.	Avoidance of unnecessary pollutants dispersion.	PR3	JSC Wind Power E&S manager	Early activities, construction and operation phase.	No pesticide used.
3.5	<b>Flicker effect avoidance</b> Consistent with ESAP action 1.12, apply turbine shutdown during operation to avoid flicker effect on sensitive receptors (including all inhabited houses) exposed more than 30 hours per year and more than 30 minutes per day in a row. The option to physically resettle or financially compensate households affected beyond the 30hours/30minutes limit, rather than applying the turbine shutdown, will only be used as a last resort option and will be subject to EBRD's non-objection based on LESA's audit.	Avoidance of flicker effect on neighbouring communities.	PR3	JSC Wind Power E&S manager	1. During disclosure  2. During design, installation and operation	1. Final flicker effect to be determined  2. Shutdown mechanism included in automates and operated.
3.6	<b>Waste management</b> Under action 1.8 (resp. 1.7), contractors (resp. Peri Construction) to include the collection, sorting and disposal in authorized places of construction wastes in the HSEMP. Peri Construction must manage the wastes produced by small contractors that follow Peri Construction's HSEMP (as described in Action 1.8)	Waste management	PR3	JSC Wind Power through specialized contractors	Early activities, construction and operation phase.	Waste collected, sorted and disposed. No anarchical waste disposal.
3.7	<b>Use of SF6</b> The use of SF6 as insulant in electro-mechanical equipment is only allowed if aligned during design, construction and operation with the objectives of the EU Regulation No 517/2014 of the European Parliament and of the Council of 16 April 2014 on fluorinated greenhouse gases.	GHG release prevention	Georgia law PR3	JSC Wind Power E&S manager in coordination with JSC Wind Power's person in charge of designers/contractors contracts preparation	Design, construction and operation	To be included in contracts: SF6 banned or managed as per EU Regulation No 517/2014 requirements

No.	Action	E&S Risks	Requirement	Responsibility	Timetable	Target and Implementation Criteria
3.8	<p><b>Noise survey and modelling</b>            Consistent with ESAP action 1.12, mobilize a reputable and experienced company to carry out a comprehensive one week day + one week-end day 24h noise survey at the closest receptors (households or sensitive public buildings) around or within the windfarm. Undertake noise modelling for all turbines taken all-together and not individually. Develop mitigation measures according to the modelling results, to ensure that the IFC general EHS guideline requirements for noise are not exceeded. Submit the results to EBRD's non-objection after LESA's review.</p>	Noise disturbance	PR3	JSC Wind Power with specialised consultant	1.Before final layout  2.Before first disbursement  3.At construction  4.At the beginning of operation	<p>1.Noise modelling carried out and integrated in final layout</p> <p>2.JSC Wind Power issues an addendum of information for final layout / design which covers flicker, noise, visual impact and ice throw considering closest receptors.</p> <p>3.Mitigation measures implemented</p> <p>4.Audit of noise levels by an independent consultant at the selected receptors</p>
3.9	<p><b>Visual Impact</b>            Carry out a Visual Impact Assessment of the wind turbines based on the draft final layout. The assessment must include all landscape related businesses and activities (tourism, recreative sites, religious or other public sites of collective interest), include public meetings in the nearest communities and provide mitigation measures where impacts are confirmed. Mitigation measures should be readily applicable (in particular, visual screens based on tree planting can only be adopted if trees of the appropriate size can be purchased and planted). Submit the results of the visual impact assessment to EBRD's non-objection after LESA's review.</p>	Visual Impact	PR3	JSC Wind Power with specialized consultant	1..Before final layout  2.Before first disbursement  3.At construction  4.At the beginning of operation	<p>1..Visual impact assessment carried out and integrated in final layout</p> <p>2.JSC Wind Power issues an addendum of information for final layout / design which covers flicker, noise, visual impact and ice throw considering closest receptors.</p> <p>3.Mitigation measures implemented</p> <p>4.Audit of visual impacts by an independent consultant at the selected receptors</p>



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4.1	<b>Worker's accommodation</b> Accommodate (and require contractors to accommodate) workers in line with the objectives of the IFC/EBRD workers' accommodation guidance note.	Healthy and safe accommodation of workers	PR4	JSC Wind Power / contractors	Early activities and construction	Workers accommodation monitored monthly by Peri E&S Manager
4.2	<b>Emergency Preparedness and Response</b> As part of the CESMP, prepare Emergency Preparedness and Response for the construction and operation periods. Update Emergency Preparedness and Response for the operation phase	Anticipation of emergency situations.	PR4	1.Contractor 2.JSC Wind Power E&S manager	1.Starting from early activities for the construction period  2.Update for the operation period.	Plan prepared, reviewed annually and updated when necessary.
4.3	<b>Exposure to pesticides</b> Include in the HSEMPs and SEPs measures to mitigate the risks associated with pesticides use by neighbouring farmers, including (i) stopping any activity and gathering at a safe point in case of nearby pesticides spraying, (ii) monitoring pesticides spraying incidents/accidents and engagement with farmers to continuously improve workers safety.	Worker's health	PR4	JSC Wind Power / contractors	Engagement and exposure avoidance mechanism put in place before construction  Implementation during construction and operation	Engagement and exposure avoidance mechanism put in place and implemented.
4.4	<b>Exposure to hunters</b> Include in the HSEMPs and SEP (see ESAP action 10.1) measures to mitigate the risks associated with hunting in the surrounding (especially quails hunting as mentioned in the ESIA), including (i) wearing high visibility jackets at all time of the hunting season for any person inside the windfarm area, (ii) stopping any activity and gathering at a safe point in case of nearby shooting, (iii) monitoring hunting incidents/accidents and engagement with local hunters associations/representatives to continuously improve workers and infrastructure safety.	Workers and infrastructure safety	PR4	JSC Wind Power / contractors	Engagement and exposure avoidance mechanism put in place before construction  Implementation during construction and operation	Engagement and exposure avoidance mechanism put in place and implemented.
4.5	<b>Communities Health, Quietness and Safety</b> Mobilize a reputable and experienced consultant to prepare and implement a <b>Communities Health, Quietness and Safety Plan</b> . This plan will cover (i) night work regulations to avoid noisy activities from 8pm to 7am near/inside settlements, (ii) dust control, (iii) traffic management to organize safe driving on the access roads ("roads" includes both the asphalted roads to the site and the earth roads within the Project footprint). Trucks involved in the Project's construction will be equipped with permanent velocity/position control system by GPS. During high-risk transportation (e.g., blades supply), local communities should be early-informed of planned traffic disruptions.	Community health and safety	PR4	JSC Wind Power E&S manager / Contractors	1.Plan prepared and enforced before construction.  2.Plan implemented during construction	1. Plan prepared, approved by EBRD, and contractually binding commitment of the contractor to implement the plan provided  2.Plan implemented by the Contractor, and monitored by Peri E&S Manager

No.	Action	E&S Risks	Requirement	Responsibility	Timetable	Target and Implementation Criteria
5.1	<p><b>Early Land Acquisition and Livelihood Restoration activities</b></p> <p>Mobilize a reputable and experienced consultant to audit against PR5 the land acquisition work done to-date, define eventual corrective actions and develop a land owners/land users database of the land plots permanently or temporarily used/affected by the Project (including land under the overhead transmission line, underground cables, substation and access roads to be used by the Project), including as a minimum:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Land permanently or temporarily required by the Project</li> <li><input type="checkbox"/> Land whose use will be limited (and consequently whose value will be decreased) by the wind turbines noise (ref. IFC general EHS guidelines) or flicker effect (ref. IFC windpower guidelines 30hours/30 minutes rule), or by the overhead line presence.</li> <li><input type="checkbox"/> Land owners (public or private, physical or moral, legal or legalizable)</li> <li><input type="checkbox"/> Land users (formal and informal, taking into account seasonal changes in land use) and employees/workers who made a livelihood on affected land</li> <li><input type="checkbox"/> Vulnerability of land owners or users, and required assistance</li> <li><input type="checkbox"/> Known land ownership or land use issues &amp; grievances</li> <li><input type="checkbox"/> Fixed infrastructures (drainage or irrigation canals, buildings, roads...)</li> <li><input type="checkbox"/> Acquisition mode (lease or purchase) and status.</li> <li><input type="checkbox"/> Land acquisition and livelihood restoration payment: identified parties, calculation basis, negotiation result and payment status</li> <li><input type="checkbox"/> Integration in a GIS with indication of readiness for entry (see ESAP Action 1.12)</li> <li><input type="checkbox"/> Legal ownership changes (legalization, heritage...)</li> </ul> <p>Document all land acquisition done prior to financial close in this database</p>	<p>Ensure appropriate identification of project affected persons, and a robust database to monitor land acquisition, compensations, and grievances..</p>	<p>PR5/PS5 Georgia legislation</p>	<p>JSC Wind Power E&amp;S manager</p>	<p>Before 1<sup>st</sup> disbursement</p>	<p>Database presented to EBRD before land acquisition starts.</p>

No.	Action	E&S Risks	Requirement	Responsibility	Timetable	Target and Implementation Criteria
5.2	<p><b>Main Land Acquisition and Livelihood Restoration activities</b>  Consistent with ESAP action 1.12, require the consultant mobilized under ESAP action 5.1 to extend the land owners/land users database to all land plots planned to be used by the Project, and develop the LALRF into a Land Acquisition and Livelihoods Restoration Plan (LALRP) including::</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Implementation of corrective actions, if any, identified under ESAP action 5.1.</li> <li><input type="checkbox"/> Detailed records of all aspects of all (individual or collective) amicable land acquisition agreements and involuntary livelihood losses/damages compensation , through the database prepared under ESAP action 5.1.</li> <li><input type="checkbox"/> Detailed monitoring of all supporting activities, including in particular: land entry authorizations, grievances management, assistance to vulnerable stakeholders, and gender specific measures.</li> </ul>	Avoidance of adverse social impacts as a result of land acquisition and use by the Project	PR5/PS5 Georgia legislation	JSC Wind Power E&S manager	1.LALRP prepared before the 1 <sup>st</sup> disbursement and updated as land acquisition progresses.  2.Monthly internal monitoring and reporting during LALRP implementation.  3.Quarterly monitoring by the LESA	1.LALRP developed as a living document.  2.Reports shared with EBRD  3.LALRP monitored by the LESA.
5.3	<p><b>LALRP completion audit</b>  Undertake completion audit for all land acquisition and livelihood restoration activities</p>	Avoidance of adverse social impacts as a result of land acquisition and use by the Project	PR5/PS5 Georgia legislation	JSC Wind Power E&S manager	2 years after completion of land acquisition.	Audit signed off by Lenders'  Number of pending complaints and their resolution status reported to lenders.
5.4	<p><b>Pre-construction surveys:</b>  Undertake with a bailiff a pre-construction survey of the condition of access roads/bridges and adjacent houses or fences/structures, with a bailiff. The objective of these surveys will be to document the pre-construction conditions and have a basis to assess the materiality of eventual damage claims. The Project's main contractor must be committed to remedy damages he or his subcontractors would cause.</p>	Prevention of illegitimate damage complaints	PR5	JSC Wind Power E&S manager	Before civil works mobilization	Survey conducted.  Damages caused by the Project remedied.

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6.1	<p><b>Birds' collision risk verification</b>            Retain an experienced company with international experience to (i) undertake additional birds surveys meeting SNH or Birdlife guidance, including a collision risk model, (ii) define a switch-off mechanism for birds of conservation interest (if present), and (iii) define a long-term birds monitoring program, including efficiency monitoring and continuous improvement of the switch-off mechanism. When selecting the Consultant, the data collected to date must be provided to the Consultant, and the Consultant shall include in his proposal a gap analysis of this data against the SNH/Birdlife guidance, in order to value already collected data as much as possible.</p> <p>Coordinate any carcass search effort with the bats mortality monitoring (see ESAP action 6.4.)</p>	Birds collision risk	PR6	JSC Wind Power Project manager	1. The contractor has been selected. The ToR is agreed before EBRD board approval.  2. Surveys to start before first disbursement  3. Before operation and before last disbursement	1. The contractor has been selected. The ToR is agreed.  2. Survey started  3. Additional survey completed necessary to have the results of the Collision Risk Model, the switch-off mechanism (if any) considered in the operation of the wind farm and expert(s) constructed for long-term monitoring program.
6.2	<p><b>Birds' collision risk management and monitoring</b>            Implement the long-term birds monitoring program defined under ESAP action 6.1. Disclose annual results, as well as switch-off mechanism efficiency and continuous improvement decisions.</p>	Birds' collisions monitoring	PR6	JSC Wind Power E&S manager	During operation.  Monitoring schedule as defined under ESAP action 6.1	Monitoring reports disclosed.  Switch-off mechanism continuously improved
6.3	<p><b>Bats protection</b>            Ensure the integration of all the Bat mitigation measures described in the ESIA Disclosure Package in the technical design, construction and operation of the windfarm. The switch-off mechanism must be automated.</p>	Ensure biodiversity mitigation measures are effectively implemented.	PR6 Georgia legislation	JSC Wind Power E&S manager, in liaison with the technical specialists	As per the ESIA Disclosure Package	ESIA Disclosure Package mitigation measures for bats effectively implemented
6.4	<p><b>Bats mortality monitoring</b>            Mobilize a reputable and experienced consultant to design a bats mortality monitoring programme, designed to inform the Project about actual mortality rates, and verify the efficiency or modify the automated switch-off mechanism. Given the size of the Project, for the sake of efficiency, it is recommended to do carcass search for birds and bats simultaneously, using a recognized method aligned on Good International Industry Practice.</p> <p>The monitoring should at least cover the first 3 years of operation and be extended in case of significant mortality.</p>	Ensure biodiversity mitigation measures are effectively implemented.	PR6 Georgia legislation  GIIP	JSC Wind Power E&S manager	1. before operation  2. during operation	1. Monitoring programme ready  2. Monitoring programme implemented

No.	Action	E&S Risks	Requirement	Responsibility	Timetable	Target and Implementation Criteria
6.5	<b>Biodiversity and environment protection</b> Include (and request contractors to include) in the workers induction training an awareness raising training about wildlife conservation in the Project area.	Biodiversity and environment protection	PR6 Georgia legislation	JSC Wind Power E&S manager	During construction period. Workers trained at induction.	Workers trained
6.6	<b>Consolidated Biodiversity Management</b> Mobilize a reputable and experienced consultant to (i) consolidate the list of terrestrial (not birds or bats) PBF/CH trigger fauna/flora species present in the Project area, and develop an avoidance strategy, (ii) prepare a monitoring and elimination program for the invasive species ( <i>Xanthium spinosum</i> ) present in the Project area, and (iii) design the conservation programme proposed by the ESIA for <i>Thymus tiflisiensis</i> , <i>Teucrium nuchense</i> , <i>Scabiosa georgica</i> , <i>Onobrychis cyri</i> , and <i>Jurinea cartaliniana</i> .  Implement all recommendations by the Consolidated Biodiversity Management Plan prepared by the Consultant.	Biodiversity and environment protection	PR6 Georgia legislation	JSC Wind Power E&S manager	1.Prior to first disbursement  2.Prior to contractor's mobilization	1.consultant selected, with EBRD's no-objection, and contracted  2. Consolidated Biodiversity Management Plan approved by Peri and EBRD, and ready for implementation
8.1	<b>Chance finds</b> With support from an experienced archaeologist, prepare a chance find procedure for contractors involved in the Project and request them to apply it. Train (and request contractors to train) workers on the nature of potential chance finds, and the way to manage them.	Minimize risk of impacts on cultural heritage	PR8	JSC Wind Power E&S manager	Prior to Construction Activities	Procedure prepared.  Contractors required to implement  Workers trained and training records held.
8.2	<b>Archaeologist</b> Hire a reputable and independent archaeologist to perform: (i) delineation of sensitive areas, (ii) awareness raising for workers in case of chance find and (iii) identify whether the area needs preliminary observation before excavation works are done.	Minimize risk of impacts on cultural heritage	PR8	JSC Wind Power E&S manager with independent archaeologist	Prior to construction activities	Independent Archaeologist hired  Sensitive sites delineated and awareness raised.
10.1	<b>Stakeholder Engagement Plan upgrade and Non-Technical Summary</b> Mobilize a reputable and experienced consultant to prepare a stand-alone and meaningful Stakeholder Engagement Plan (SEP), fit for a Category A disclosure, covering the disclosure period, pre-construction and construction. Key information to be communicated in Georgian and English languages.  Prepare a Non-Technical Summary for disclosure with the ESIA Package.	Meaningful consultation	PR10	JSC Wind Power E&S manager	<b>Prior to the formal Category A disclosure required by EBRD</b>	Meaningful SEP prepared and approved by EBRD.
10.2	<b>Stakeholder Engagement Plan implementation</b> Implement the Stakeholder Engagement Plan (SEP). Review at least annually and update when necessary (and in any case before operation). Key information to be communicated in Georgian and English languages.	Ensure effective stakeholder engagement and good community relations	PR10	JSC Wind Power E&S manager	Across disclosure period, pre-construction, construction and operation.	SEP prepared and implemented, regularly updated.

No.	Action	E&S Risks	Requirement	Responsibility	Timetable	Target and Implementation Criteria
10.3	<b>Community grievance mechanism</b> Establish and maintain an effective community grievance mechanism, included in the SEP.	Ensure effective stakeholder engagement and maintain good community relations	PR10	JSC Wind Power E&S manager	Starting from early activities, continued across construction and operation.	Grievance mechanism prepared, put in place and communicated to affected communities. Grievance record maintained, and grievances timely managed.
10.4	<b>Environmental information sharing</b> Disclose and maintain access to environmental and social documents of interest to the public the ESIA Disclosure Package and other relevant documents available on the company and Lenders' website.	Ensure effective stakeholder engagement and maintain good community relations	Good practice	JSC Wind Power E&S manager	During operation	Environmental and social information shared with the public.