



Ecoline
International

BELARUS BRIDGES PROJECT

ENVIRONMENTAL AND SOCIAL ACTION PLAN



Bridge over the Neman River at the 65,774 km of the P-41 road



Bridge over the Berezina River at 230,961 km of the P-43 road

October 2019

BELARUS BRIDGES PROJECT

ENVIRONMENTAL AND SOCIAL ACTION PLAN

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DETAILS OF DOCUMENT PREPARATION AND ISSUE:

Version	Date	Description
1	15.10.2019	Draft Report for EBRD's review
2	18.10.2019	Pre-final Draft Report for EBRD's review
3	24.10.2019	Final Draft Report for EBRD's review
4	31.10.2019	Final Report

1. ENVIRONMENTAL AND SOCIAL ACTION PLAN

The below Environmental and Social Action Plan is based on the findings from the European Bank for Reconstruction and Development ('EBRD' or 'the Bank') compliance matrix for the Project and short review of operational performance of MinskAvtodor-Centre Regional Unitary Enterprise (RUE) ('the Company').

No.	Action	Environmental and Social Risks (Liabilities / Benefits)	Requirement (Legislation, EBRD PRs, Best Practice)	Resources, Investment Required, and Responsibility	Timetable	Target / Evaluation Criteria	Status / Comments
PR1	Assessment and Management of Environmental and Social Impacts and Issues						
1.1.1.	MinskAvtodor-Centre's Environmental and Occupational Safety Policy to include provisions on managing the contractors' environmental and occupational health and safety (EHS) performance	Effective management of Company's EHS performance	EBRD PR1 "Environmental and Social Management Systems" ISO 14001 and ISO 45001 standards	Company's internal resources - Responsible staff within the Company	Q1 2020	Provisions on managing the contractors' EHS performance incorporated in MinskAvtodor-Centre's Environmental and Occupational Safety Policy; the Policy formally approved	Open
1.2.	Implement all mitigation and monitoring measures identified in the EIA Reports for each bridge	Project implemented in an environmentally and socially sound manner	EBRD PR1 "Environmental and Social Assessment"	Company's internal resources; contractor's resources - Responsible staff within the Company	As the Project proceeds	Document the completion of mitigation and monitoring measures, report on their progress through annual reports submitted to EBRD	Open
1.3	Develop and implement the ESAP and annually report on its progress to EBRD	Proper environmental action planning, implementation and monitoring	EBRD PR1 "Environmental and Social Management Plan"	Company's internal resources - Responsible staff within the Company	Q1 2020 to develop the ASAP, and onwards – to implement and monitor it	ESAP developed and maintained; implementation progress is annually reported to EBRD	Open
1.4.1.	Define / allocate EHS responsibilities including the appointment of a dedicated officer to effectively manage and monitor the contractors' EHS performance	More effective management of Company's EHS performance	EBRD PR1 "Organisational Capacity and Commitment" ISO 14001 and ISO 45001 standards	Company's internal resources (a dedicated officer) in combination with external training	Q1 2020 – Q2 2020	EHS functions defined and allocated (job descriptions available); a dedicated EHS manager appointed and trained	Open
1.4.2.	Improve the Company's EHS management capacity through staff			- Company's top management	Q1 – Q3 2020 and onwards as per	EHS training provided; attendance record maintained	Open

	training and awareness raising on EHS issues				approved training schedule		
1.5.1.	Develop the Contractors EHS Performance Management Programme, to take account of applicable EBRD requirements and national legislation. The Programme shall cover all stages in the contractor engagement process – from formulating the bidding terms and conditions and selection of successful bidders to managing contractor's performance, including building contractor's capacity in the EHS field	More effective management of contractor's EHS performance	EBRD PR1 "Supply Chain Management"	Company's internal resources - A dedicated EHS specialist	Q1 2020 – Q2 2020	The Contractors EHS Performance Management Programme developed and adopted in line with EBRD requirements and national legislation	Open
1.5.2.	As a matter of urgency, amend the bidding documentation by including requirements for bidders that would ultimately ensure that selected contractors implement the ESAP within the framework of the Project				During the preparation of bidding documentation	Relevant EHS requirements to bidders developed and incorporated in the bidding documentation	Open
1.6.1.	Develop the monitoring and reporting procedure for the Project to ensure that all parties to the Project (including contractors and subcontractors) are in compliance with the applicable EHS requirements.	More effective management of contractor's EHS performance	EBRD PR1 "Supply Chain Management" and "Project Monitoring and Reporting"	Company's internal resources - A dedicated EHS specialist	Before the start of construction	Relevant requirements to contractors included in the bidding documentation	Open
1.6.2.	Prepare and disclose annual environmental and social performance reports to the public (as per the Project's SEP).	Greater transparency and Company's environmental and social responsibility commitment			Within 90 days after the end of the reporting year; annually	Annual environmental and social performance reports disclosed to stakeholders	Open
PR2	Labour and Working Conditions						
2.1.1.	Design stage: <ul style="list-style-type: none"> Estimate the construction labour requirement for the Project Establish worker accommodation standards for the construction 	Effective management of human resources, reduced risk of poor employee-management relations	EBRD PR2 EBRD and IFC Guidance "Worker's Accommodation:	Company's internal resources - A dedicated EHS specialist	At the design stage	<ul style="list-style-type: none"> Project's requirement for construction labour estimated Worker accommodation standards in 	Open

	workforce to be included in bidding documentation and contracts covering all construction sites.		Processes and Standards”			tendering documentation	
2.1.2.	<p>Contractor selection stage: to address the following issues in the bidding documentation:</p> <ul style="list-style-type: none"> • Non-discrimination, unacceptable forms of work such as forced labour and child labour, freedom of association, and basic human rights; • Compliance with regulations pertaining to work hours, wages and social protection of employees, • Develop worker accommodations plans for each construction site noting where employees will be housed and assurance of compliance with the worker accommodation requirements; <p>Specify how the Company will monitor worker accommodations arrangements to ensure compliance with standards.</p>	Effective management of human resources, reduced risk of poor employee-management relations	<p>EBRD PR2 EBRD Gender Equality Strategy for 2016-2020 ILO Conventions No. 100 and 111 Republic of Belarus Labour Code</p>	<p>Company's internal resources; Contractor's resources</p> <p>- A dedicated EHS specialist</p>	<p>During the development of bidding documents</p> <p>Before the start of construction</p>	<ul style="list-style-type: none"> • Relevant criteria/requirements to contractors included in the bidding documentation • Worker accommodation plans developed by the Contractors and agreed by the Company; • Monitoring of the worker accommodation incorporated into the regular EHS checks as per Action 2.5 of this ESAP 	Open
2.1.3.	<p>Contract signing stage:</p> <ul style="list-style-type: none"> • The contracts to contain the obligation to comply with EBRD's labour relations 	Effective management of human resources, reduced risk of poor employee-management relations	EBRD PR2	<p>Company's internal resources</p> <p>- A dedicated EHS specialist</p>	Contract signing stage	Relevant provisions included in the contracts	Open

	standards and responsibility for non-compliance						
2.1.4.	Develop a Human Resource Policy, adopt and implement it	Enhanced management of human resource	EBRD PR2	Company's internal resources - A dedicated EHS specialist	Q4 2019 – Q1 2020	Human Resource Policy developed and approved	Open
2.2.	Include the non-discrimination and equal opportunity provisions in the Human Resource Policy	Enhanced management of discrimination and inequality risks	EBRD PR2 EBRD's Human Resources Policies and Employee Documentation. Guidance Note (2017) SA 8000: 2014 EBRD Gender Equality Strategy for 2016-2020 ILO Conventions No. 100 and 111 Republic of Belarus Labour Code	Company's internal resources - A dedicated EHS specialist	Q4 2019 – Q1 2020	Non-discrimination and equal opportunity provisions included in the Human Resource Policy	Open
2.3.	Develop a special retrenchment procedure at least three months before the actual date of collective dismissal and communicate it to employees	Reduced risk of conflicts related to retrenchment	EBRD PR2 EBRD's Workforce Retrenchment. Guidance Note (2017)	Company's internal resources - A dedicated EHS specialist	Three months before a planned retrenchment	Retrenchment procedure developed and communicated to employees	Open
2.4	Establish and maintain a worker grievance mechanism both for the company employees and contractors. The mechanism should allow for confidential complaints to be raised and addressed. Appoint a female confidant at the Company that can be approached by female staff of the Company and its contractor(s)/ supplier(s). The Company should explain the use of the mechanism to its staff during the induction.	An effective grievance mechanism allows the Company to avoid conflicts between employees and management or in case of a conflict solve it internally not addressing it to the controlling bodies and/or to the court.	EBRD PR2, EBRD's Employee Grievance Mechanism. Guidance Note (2017)	Company's internal resources A female staff member trained to act as a confidant for female employees	Q4 2019 – Q1 2020 (to establish a mechanism) and onwards (to maintain it)	Worker/contractor grievance mechanism adopted and communicated to all employees and contractors. A female confidant appointed.	Open

2.5.	Inspect the Project sites monthly to check whether the EHS measures adopted for the Project (i.e. the use of PPE) are applied efficiently among the contractors' staff and document results	Improved management of non-employee labour used in the Project and along the supply chain. Risk of inadequate accommodation provided to contractor's workforce	EBRD PR2, EBRD and IFC Guidance "Worker's Accommodation: Processes and Standards"	Company's internal resources - A dedicated EHS specialist	Monthly after the commencement of works	Record of inspection results maintained in the Company	Open
2.6.	Require the contractors to provide a written declaration that no people below 18 will be employed and no forced labour will be used for any services or goods to be provided to the Company	Improved management of non-employee labour used in the Project and along the supply chain	EBRD PR2 "Supply Chain" ILO Convention No. 138	Company's internal resources - A dedicated EHS specialist	Prior to contract signing	Declaration provided and can be made available for the EBRD's review upon request	Open
PR3	Resource Efficiency and Pollution Prevention and Control						
3.1.	Conduct air quality and noise measurements in the bridge rehabilitation/construction areas and bridge approaches located in the immediate vicinity of residential areas. Measurements are to meet the IFC requirements (i.e. daily measurements)	Air quality and acoustic measurements conducted before the development of design documentation will provide baseline information required for identifying appropriate mitigation measures for both construction and operation stages (e.g. installing soundproof windows and noise screens, putting fast-growing plants etc.)	EBRD PR3	Company's internal resources, external consultants - A dedicated EHSS specialist	Design stage and before the start of construction	Air quality and noise measurements completed using equipment and methods included in the National Register. To improve the representativeness of measurement results, increase the duration of continuous measurements to 24 hours or to standard work shift hours (from 8:00 to 17:00). Long-term measurements conducted at the bridge rehabilitation/construction sites (including bridge approaches) located in the immediate vicinity of residential areas. Mitigation measures developed on the basis of measurement results (e.g. installing soundproof windows and noise screens)	Open

3.2.	Conduct river water quality measurements downstream of the bridge rehabilitation sites to determine background concentrations of pollutants (measure pollutant concentrations twice – during both low-flow and high-flow periods)	Background pollutant concentrations are required for determining reference concentrations and developing a river water quality monitoring programme	EBRD PR3 “Pollution Prevention and Control”	Company’s internal resources - A dedicated EHSS specialist	Design stage	Key performance parameters developed and verified	Open
3.3	Develop a local monitoring programme to monitor water pollution (turbidity) levels in the rivers during the construction and demolition works	Local water pollution monitoring will ensure that adequate control of impacts is maintained and corrective action is taken in a timely manner	EBRD PR3 “Pollution Prevention and Control”	Company’s internal resources, external consultant - A dedicated EHSS specialist	Design stage (to develop a programme) and throughout construction (to conduct monitoring)	Local water pollution (turbidity) monitoring programme developed for the construction and demolition stage. Monitoring is maintained and documented	Open
3.4.1	Develop spillage/leakage prevention and management procedures and conduct oil spill response drills for relevant staff members	Risk of local-scale soil, surface and ground water pollution	EBRD PR3 “Pollution Prevention and Control”	Company’s and contractor’s internal resources - A dedicated EHSS specialist	Procedures developed and training provided before the commencement of construction works	Spillage/leakage prevention and management procedures developed. Training provided and documented	Open
3.4.2.	Provide spill/leak control kits and spill containment trays in the places where oil product spills might occur	Risk of local-scale soil, surface and ground water pollution	EBRD PR3 “Pollution Prevention and Control”		Before the commencement of construction	Spill/leak control kits and spill containment trays provided in the places where oil product spills might occur	Open
3.5.1.	Ensure that different generated waste streams are collected separately taking account of waste recycling capacities that exist in the region	Waste generation and soil/air pollution	EBRD PR3 “Waste”	Company’s and contractor’s internal resources - A dedicated EHSS specialist	Throughout construction/rehabilitation	Generated waste collected separately in designated containers	Open
3.5.2.	Provide proper storage areas for the safe storage of generated waste					Proper storage areas for the safe storage of waste provided	
3.5.3.	Store sizeable construction wastes at the designated storage sites and hand them over to specialised waste management companies					Generated waste temporarily stored at the construction sites in line with good practices and	

	Maximise the use of generated waste in the construction of new bridges or rehabilitation of existing ones (construction waste, bridge demolition waste etc.); pre-ground waste can be used to build bridge piers, approach roads etc.					used by contractors onsite for construction purposes and/or handed over to specialised waste reuse/recycling companies ¹	
PR4	Health and Safety						
4.1	<p>Implement the following community health and safety measures:</p> <ul style="list-style-type: none"> • Complete all mitigation actions designed to reduce impacts on community health and safety and identified in the EIA Report for each bridge. • Complete all mitigation actions designed to reduce impacts brought about by changes in traffic regime and identified in the EIA Report for each bridge. • Conduct traffic and pedestrian safety awareness actions as per the Project's SEP (installation of billboards with information on traffic safety rules, holding training workshops for scholars) 	Minimise risks to communities	EBRD PR4 "Community Health and Safety"	<p>Company's internal resources Contractor's internal resources - A dedicated EHSS specialist</p>	Throughout construction/rehabilitation	Community health and safety actions completed and documented	Open
4.2.	Complete all OHS measures identified in the EIA Report for each bridge identified for operations/activities involving exposure to hazardous materials and ensuring the safe storage and use of such materials	Enhanced OHS performance of contractors	EBRD PR4 "Occupational Health and Safety" ISO 45001	<p>Contractor's internal resources - Monitoring by a dedicated EHSS specialist</p>	Throughout construction until equipment is put into operation	OHS actions completed and documented (records available for EBRD upon request)	Open

¹ Waste recycling plants have been built in Gomel Region (Gomel), Mogilev Region (Mogilev), Vitebsk Region (Novopolotsk) and Brest Region (Brest and Baranovichi) to ensure more efficient recovery of recyclable components from communal waste. The construction of a similar plant is underway in Grodno Region – Information from the 7th National Communication of the Republic of Belarus under the UN Convention on Climate Change, 2018 (available at https://unfccc.int/sites/default/files/resource/92104765_Belarus-NC7-1-AI_BLR_NC7.pdf)

4.3.	Request the contractors to identify and assess potential emergency situations that may occur in the course of the Project or as a result of natural disasters; develop an Emergency Response Plan. Conduct emergency management trainings and drills	Risk of emergencies Enhanced EHS performance of contractors; prevention of risks of injury for contractor's staff	EBRD PR4 "Occupational Health and Safety" ISO 45001 EBRD PR4 "Emergency Preparedness and Response" Good practice, e.g. IFC Managing Contractors' Environmental and Social Performance Good Practice Note (2017)	Company's and contractor's internal resources - A dedicated EHSS specialist	Before the commencement of installation works / before the contractor's staff is permitted to work at the Company site	Emergency Response Plans developed by contractors and endorsed by the Company; OHS trainings provided and results documented	Open
PR5	Land Acquisition, Involuntary Resettlement and Economic Displacement						
5.1.1.	Use state-owned/managed/used land as much as possible for siting the Project's temporary and permanent facilities	Minimise the Project's land acquisition impact	EBRD PR5	Company's internal resources, designer's time - A dedicated EHSS specialist	Design stage	Documented evidence of decisions and alternatives demonstrating efforts taken to avoid impact on land that is not owned/used by the state	Open
5.1.2.	Keep bridge approaches as short as possible whilst not compromising road safety and environmental and social considerations						
5.1.3.	Identify those roadside infrastructural facilities and services (filling stations, cafes, shops etc.), access to which might be impeded as a result of the Project. Ensure their normal operation, provide alternative access for customers where needed (depending on whether any of these facilities are included in the Land Acquisition and Compensation Plan(s) – see Item 5.2.)	Minimise the economic displacement of infrastructural facilities and services	EBRD PR5	Company's internal resources, designer's time - A dedicated EHSS specialist	Design stage	Roadside services and facilities identified. Documented evidence of decisions and alternatives demonstrating efforts taken to avoid economic displacement of roadside services and facilities located in the area of impact of new bridge approaches. Mitigation measures included in the Plans (Item 5.2) and implemented	Open

5.2.	<p>Should the need to acquire land rights from private owners arise during the Project design process, including formal and informal users as defined in EBRD PR5, and should the need to relocate any objects (cultural, infrastructural, etc.) outside the land allocated for the construction of the bridges, develop the Land Acquisition and Compensation Plan for each specific bridge and implement it before the commencement of construction activities at such sites.</p> <p>Land Acquisition and Compensation Plans to address the following issues:</p> <ul style="list-style-type: none"> • Plan consultations with affected parties, • Develop a grievance mechanism, • Adequately compensate land and impacts to the livelihoods of affected people/businesses, • Provide arrangements for ongoing monitoring and completion audit (as agreed with EBRD). 	Properly planned land acquisition process based on meaningful consultations with affected parties	EBRD PR5 Republic of Belarus legislation	Company's internal resources, external consultants - A dedicated EHSS specialist Company staff	Before the start of construction activities (both development and implementation of plans)	<p>The Land Acquisition and Compensation Plan developed and implemented for each specific bridge.</p> <p>Adequate planning, consultation, grievance and monitoring arrangements provided in each plan</p> <p>The completion audit conducted as agreed with EBRD</p>	Open
PR6	Biodiversity Conservation and Sustainable Management of Living Natural Resources						
6.1.	<p>Address the need to ensure that construction-related disturbance is prevented during fish spawning and bird nesting periods in the Construction Management Plans for Bridges No. 1 and No. 4.</p> <p>Define critical periods for protected species</p>	Risk of impact on bird and aquatic fauna in the protected areas and temporary construction sites	EBRD PR6	Company's internal resources, contractor's (designer's) time RB NAS Institutes	Design stage	<p>Periods of no disturbance defined and scientifically grounded for protected species.</p> <p>Construction schedule adjusted to take account of this requirement</p>	Open

6.2.	Develop a Biodiversity Conservation Plan that is appropriate to the Project to be implemented in the areas with rich biodiversity. Implement the Plan and monitor its progress	Risk of adverse impact on biodiversity in the construction areas and downstream sections of watercourses	EBRD PR6	Company's internal resources, contractor's (designer's) time - A dedicated EHSS specialist	Design stage	Biodiversity Conservation Plan including the monitoring procedure	Open
PR7	Indigenous People: not applicable to the Project						
PR8	Cultural Heritage						
8.1.1.	As part of the design process, obtain the official conclusion from relevant authorities regarding the presence of archaeological heritage and the need (or the lack thereof) for conducting an archaeological survey at the planned Project sites before the commencement of rehabilitation activities at each site	Compliance with the Republic of Belarus legislation	EBRD PR8 Republic of Belarus legislation	Company's internal resources, external consultants - A dedicated EHSS specialist	Design stage	Official conclusion obtained for each bridge	Open
8.1.2.	Regardless of what conclusion the relevant authority issues, conduct the archaeological survey at the new bridge construction sites (Nos. 1, 2, 3, 6, 7, 9, 10 and 11) which occupy Greenfield areas	Compliance with the Bank requirements, conservation of cultural heritage	EBRD PR8	Company's internal resources, external consultants - A dedicated EHSS specialist	Design stage	Archaeological survey conducted at the proposed construction sites for new bridges (Nos. 1, 2, 3, 6, 7, 9, and 10 and 11) which occupy Greenfield land	Open
8.2.	Develop and adopt a Chance Finds Procedure as per EBRD PR8; conduct chance finds management briefings for contractors and their employees involved in earthworks	Discovery and preservation of chance finds of potential historical and cultural significance	EBRD PR8	Company's internal resources - A dedicated EHSS specialist	Procedure developed before the start of construction/maintained throughout construction	A Chance Finds Procedure developed in line with EBRD PR8; a chance find management briefing provided for employees and documented	Open
8.3.	Upon agreement with the local authorities, communities and Museum of Local History representatives, organise the relocation of the WW2 monument to a new site. Supervise the	Conservation of cultural heritage	EBRD PR8	Company's internal resources and contractors performing the relocation work -	Before the start of construction activity at this site	Documented protocols of consultations about the relocated of the monument Formal supervision report on compliance of the	Open

	performance of relocation works to ensure compliance with OHS requirements regardless of whose workers physically perform the work.			A dedicated EHSS specialist		completed monument relocation works with EHS requirements	
PR10	Information Disclosure and Stakeholder Engagement						
10.1.1.	Implement the SEP adopted for the Project	Improved relationships with stakeholders; greater visibility/ accessibility	EBRD PR10 EBRD's Public Information Policy (2014)	Company's internal resources, management staff time Contractor's internal resources	Throughout 2019 and 2020	SEP implementation and monitoring results documented	Open
10.1.2.	As part of the design process for each bridge, identify affected groups and hold face-to-face consultations with them				Before the start of construction	Documented minutes of consultation meetings	
10.1.3.	Update the SEP before commissioning the facilities constructed / rehabilitated as part of the Project				Before the commissioning of Project facilities	Updated SEP approved by EBRD	
10.1.4.	Monitor the SEP implementation and include monitoring results in the annual progress reports for EBRD				Throughout the Project lifecycle	SEP monitoring results included in the annual reports to EBRD	
10.2.1.	Develop and adopt a grievance procedure for external stakeholders and communicate it to the general public (in line with EBRD PR10 and the Project's SEP)	Improved relationships with stakeholders	EBRD PR10	Company's internal resources - A dedicated staff member	Before the start of the Project	A grievance procedure developed and adopted (and made public on the Company's website).	Open
10.2.2.	Maintain a stakeholder grievance log book for each Project component; provide it to EBRD upon request				Throughout the Project lifecycle	A log book of grievances filed by external stakeholders maintained	

Abbreviations Used:

<i>WHO – World Health Organisation</i>	
<i>EBRD – European Bank for Reconstruction and Development</i>	<i>PPE – Personal Protective Equipment</i>
<i>ILO – International Labour Organisation</i>	<i>PR – Performance Requirement (EBRD)</i>
<i>IFC – International Finance Corporation</i>	<i>ISO 9001 – Standard on the Quality Management Systems Standard</i>
<i>EP – Environmental Protection</i>	<i>ISO 45001- Standard on the Occupational Health and Safety (OH&S) Management Systems</i>
<i>EHSS – Environmental, Occupational Health and Safety, and Social</i>	<i>SA 8000 – Standard on Social Accountability</i>
<i>OHS – Occupational Health and Safety</i>	