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International

## NORTH MACEDONIA – REGIONAL GASIFICATION PROJECT

# ENVIRONMENTAL AND SOCIAL ACTION PLAN

**September 2022**

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## ENVIRONMENTAL AND SOCIAL ACTION PLAN

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**Prepared for:**

**European Bank for Reconstruction and Development**

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## DETAILS OF DOCUMENT PREPARATION AND ISSUE:

Version	Prepared by	Reviewed by	Authorised for issue	Issue Date	Description
1	Sean O'Beirne Maia Gachechiladze-Bozhesku	Sean O'Beirne	Maia Gachechiladze-Bozhesku	8 September 2022	Draft version for review by the EBRD
2	As above	As above	As above	11 September 2022	Draft version integrating for review by the EBRD and the Client
3	As above	As above	As above	16 September 2022	Final version for disclosure

## LIST OF ABBREVIATIONS

BAP	Biodiversity Action Plan
E&S	Environmental and social
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESAP	Environmental and Social Action Plan
ESMS	Environmental and Social Management System
ESMS	Environmental and Social Management Plan
LRF	Livelihood Restoration Framework
LRP	Livelihood Restoration Plan
OHS	Occupational Health and Safety
PR	Performance Requirement (of EBRD)

## ENVIRONMENTAL AND SOCIAL ACTION PLAN

National Energy Resources JSC Skopje<sup>1</sup> (NER or “the Company”), the North Macedonian state-owned company responsible for the country’s gas transmission network, is planning to construct three underground gas pipeline sections (“the Project”) in North Macedonia:

- a 67-km North Macedonian section of the Greece-North Macedonia Interconnector,
- a 28-km Sveti Nikole-Veles Section, and
- a ca. 35-km Gostivar-Kicevo Section<sup>2</sup>.

Financing for the Project is being sought from the international financial institutions including the European Bank for Reconstruction and Development (EBRD) and the European Investment Bank (EIB – for the North Macedonian section of the Greece-North Macedonia Interconnector) (together “the Lenders”).

The Environmental and Social Action Plan (ESAP) presented below has been prepared **for the Project** in line with the EBRD’s requirements. The ESAP is based on the compliance review of a) Interconnector’s Environmental Impact Assessment (EIA, 2021), Social Impact Assessment (EIA, 2021), Supplementary Environmental and Social Impact Assessment (Supplementary ESIA, 2022); b) ESIA for the Sveti Nikole-Veles Section (2022), and c) Gap Analysis for the Project (2022) against the EBRD’s Environmental and Social Policy (2019) and Performance Requirements (PR)<sup>3</sup>.

As the three pipeline sections are in different development stages, their public disclosure per EBRD requirements and consideration for funding by the EBRD will occur in two stages:

- first, the environmental and social documents for the Interconnector and Sveti Nikole-Veles Sections (and the Gostivar-Kicevo Section at a high level, to the extent the section’s details are known as of August 2022) will be publicly disclosed for review by stakeholders in English and Macedonian, and
- second, the environmental and social documents for the Gostivar-Kicevo Section will be disclosed at a later stage, once developed. To reflect new information on the Gostivar-Kicevo Section, the relevant Project’s environmental and social documents will be updated and re-disclosed as well. These documents will also be made available in Albanian.

The EBRD will decide on financing for the Interconnector and Sveti Nikole-Veles Sections following the conclusion of the 120-day disclosure period. The Gostivar-Kicevo Section will be considered for financing by the EBRD only once its environmental and social documents have been prepared and disclosed for 120 days, at a later stage.

The ESAP is an overarching document describing the measures needed to bring the performance of the Company (the Bank’s Client) and Project implementation in compliance with the requirements of the EBRD and the national legislation of the Republic of North Macedonia (RNM).

NER will hold responsibility for the implementation of the Project activities and ESAP.

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<sup>1</sup> The Company’s website is <https://mer.com.mk/en-US/ForUs/ZaMer>.

<sup>2</sup> As the route is being re-aligned, the length of the section might change.

<sup>3</sup> EBRD. 2019. Environmental and Social Policy. <https://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html>.

**Table 1. Environmental and Social Action Plan**

No.	Action	Environmental & Social Risks (Liability / Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
<b>PR1</b>	<b>Assessment and Management of Environmental and Social Risks and Impacts</b>					
	<b>Pre-construction phase</b>					
1.1	<b>Corporate level</b> Develop an Environmental and Social Management System (ESMS) to consolidate and combine all the E&S management requirements for the design, construction and operation of the three Project pipelines. The ESMS should be benchmarked against applicable EU standards and EBRD Performance Requirements (PRs) for compliance	All E&S risks and benefits	EBRD PR 1	NER consultant with	Prior to any further project activities	Good practice E&S management compliant with EBRD requirements on all three pipelines with few complaints and minimal incidents.
1.2	<b>Corporate level</b> Develop an organizational E&S Policy that details Company's commitment to issues such as low carbon activities, pollution prevention, biodiversity management and conservation, compliance with lender requirements and so forth	All E&S risks and benefits	EBRD PR 1	NER consultant with	Prior to any further project activities	E&S Policy adopted. Good practice E&S management compliant with EBRD requirements on all three pipelines with few complaints and minimal incidents.
1.3	<b>Corporate level</b> As part of the ESMS, develop and implement a Change Management Procedure to ensure any changes to the original design, capacity, location or process technology are assessed from environmentally and socially and any new impacts are appropriately addressed and mitigated.	Assessment and management of E&S impacts resulting from changes in the Project	EBRD PR 1 and PR10	NER consultant with	As part of the ESMS	Change management procedure is adopted and applied
1.4	<b>All sections</b> Develop an E&S specification detailing the E&S requirements, including those contained in this ESAP, Livelihood Restoration Framework (LRF) and respective Biodiversity Action Plans (BAPs), as applicable to construction period, to be met by bidders to ensure that financial provision is made for the mitigation specified in the ESAs, in their bids.	All E&S risks associated with construction activities and which are the responsibility of the contractor	EBRD PR 1, PR2, PR3, PR4, National laws	NER	Develop before issuing tender / procurement documents.	The E&S specification included in the tender documents. Good practice E&S management compliant with EBRD requirements on all three pipelines with few complaints and minimal incidents.

No.	Action	Environmental & Social Risks (Liability / Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	The specification to include <i>inter alia</i> , all mitigation prescribed for the Construction Contractor for the construction phase so that financial provision is made for that mitigation.					
1.5	<p><b>All sections</b>            Appoint dedicated E&amp;S and Occupational Health and Safety (OHS) managers assisted by a dedicated E&amp;S and OHS resource for each of the three pipeline sections at 1) NER, 2) Construction Supervision Contractor, and 3) Construction Contractors responsible for implementation of the ESAP requirements. Provide required training on the EBRD PRs.</p> <p>E&amp;S and OHS Managers of the Construction Contractors should be capable of directing construction activities to comply with the E&amp;S and health and safety requirements detailed in the ESMS and the associated E&amp;S Management Plans (ESMPs).</p>	All E&S risks associated with construction activities	EBRD PR 1, PR 4	NER; Construction Supervision Contractor; All Construction Contractors	Provisions to have such staff to be made in the tender documents; implementation prior and during construction	E&S and OHS Managers appointed and E&S and OHS support is available for all pipeline sections Good practice E&S management compliant with EBRD requirements on all three pipelines with few complaints and minimal incidents.
1.6	Develop a single E&S Commitments Register to aggregate all required avoidance and mitigation measures, as identified by relevant ESIA documents, and include these into Tender Specifications and E&S and health and safety plans as appropriate.	All E&S, including health and safety, risks associated with construction activities	EBRD PR 1	NER	Provisions to have such staff to be made in the tender documents; implementation prior and during construction	Implementation of all commitments is tracked, verified and reported
1.7	<p><b>All sections</b>            Develop an alignment E&amp;S risks map, based on the selected routes and approved construction schedule, to flag the key third party risks from construction and ultimately operational activities (and other risks) as a function of the pipeline alignment. These risks include but are not limited to road and river crossings, proximity to sensitive social infrastructure such as schools, hospitals, places of worship, land acquisition requirements and timing, sensitive environmental features and management</p>	E&S risks pertaining to sensitive E&S receptors	EBRD PR 1	Construction Supervision Contractor's E&S manager together with the NER E&S managers	Prior to any further project activities for Construction Supervision Contractor	No damage to, or loss of, amenity at sensitive receptors.

No.	Action	Environmental & Social Risks (Liability / Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	requirements for the same, especially in respect of seasonal timing (viz. avoiding breeding seasons and so forth).					
1.8	Develop and implement a <b>Procedure for Managing Construction Contractors</b> to manage their E&S, including Health & Safety, performance per EBRD PRs and national regulations.	Effective management of contractor's E&S performance and improved safety of their operations	PR1, PR2, PR3, PR4, PR8 National regulations	NER	Develop prior to the construction stage and implement during it	NER's Construction Contractors' Management Procedure developed and applied Contractor management outcomes reported to EBRD annually
1.9	<b>All sections</b> Specify overall monitoring and reporting obligations as detailed in the ESIA as part of the Scope of Work for the construction supervision contractor. Information from the monitoring network will be reported to NER.	All E&S risks associated with construction activities	EBRD PR 1	Construction supervision contractor	Prior to construction	High quality E&S performance management record
1.10	<b>Gostivar-Kicevo Section</b> Prepare an ESIA for the Gostivar-Kicevo Section to meet the EBRD requirements, including holding scoping consultations.  <i>[NB: in case an EIA will be required by the MoEPP as part of the national permitting process, NER will assess its gaps and will develop a supplementary ESIA for this section in line with the EBRD requirements].</i>	All E&S risks	EBRD PR 1 and other applicable PRs	NER, Consultant	Prior to the second 120-day disclosure	ESIA compliant with EBRD requirements
1.11	Implement all mitigation and monitoring actions from the following E&S documents: 1. Interconnector's Environmental Impact Assessment (EIA, 2021), Social Impact Assessment (EIA, 2021), and Supplementary Environmental and Social Impact Assessment (Supplementary ESIA, 2022); and 2. Sveti Nikole-Veles Section ESIA (2022).	All E&S risks	EBRD PRs 1, 2, 3, 4, 5, 6, 8, and 10	Construction Contractors during the construction stage under supervision of NER and Supervision Contractor	As required in the E&S documents	Full implementation of all E&S mitigation and monitoring requirements.
	<b>Construction and operational phases</b>					

No.	Action	Environmental & Social Risks (Liability / Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
1.12	Commission an independent Lender's E&S Consultant to monitor the Project performance against the EBRD requirements.  <i>NB: the Terms of Reference for this consultant are to be agreed with the EBRD before hiring</i>	Achieved compliance with the Project's E&S commitments	EBRD requirements	NER / consultant selected by the EBRD	Quarterly during construction and bi-annually during operations	Monitoring reports submitted to the EBRD's and NER; Corrective actions identified in the monitoring reports are implemented
1.13	Provide Annual E&S Reports to the EBRD on the ESAP progress and the Projects E&S performance.	Timely monitoring and reporting on the Project's E&S commitments	EBRD PRs 1, 2, 3, 4, 5, 6, 8, and 10	NER	As agreed in the Loan Agreement	Annual reports are submitted to the EBRD
<b>PR2</b>	<b>Labour and Working Conditions</b>					
	<b>Pre-construction phase</b>					
2.1	<b>Corporate level корпоративно ниво</b> <ul style="list-style-type: none"> <li>Update and implement an overarching Human Resources (HR) policy, confirming commitment to comply with EBRD PR2. Inform the staff and contractors about the provisions of this HR Policy.</li> <li>In the HR Policy, include clear commitments to non-discrimination, equal opportunities, and principles to prevent and respond to Gender-Based Violence and Harassment (GBVH).</li> <li>Cascade the above commitments into the existing HR procedures and inform the staff and contractors about these commitments.</li> </ul>	Improved human resources management, reduced risk of poor employee / management relations	EBRD PR2 EBRD Guidance Note "Human Resources Policies and Employee Documentation" (2017) SA 8000:2014, ISO 26 000; Good international practice <sup>4</sup>	NER	Before construction starts	Updated Human Resources Policy and supporting procedures adopted and communicated to the Company employees and contractor staff. Monitoring results reported annually
2.2	<b>All sections</b> Establish a worker grievance mechanism that meets the EBRD's PR2 requirements (including addressing anonymous and verbal grievances) and that will be accessible to NER staff and	Improved management of social risks. All grievances are	EBRD PR2	The Company / third-party experts if needed	Before construction starts and implement	Grievance procedure adopted and explained to employees and contractors. An Employee Grievance Log maintained to reflect the

<sup>4</sup> For example, EBRD, IFC and CDC Guidance on Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector (2020).

<https://www.ebrd.com/news/2020/new-guidance-for-private-sector-on-addressing-risks-of-genderbased-violence-and-harassment.html>



No.	Action	Environmental & Social Risks (Liability / Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	non-employee workers. Inform the employees and non-employee (contractors) about the worker grievance mechanism and its use.	considered and addressed properly			during the Project life-cycle	status of each grievance and actions taken to deal with it Grievance results reported annually
2.3	<b>All sections</b> Undertake a supply chain screening assessment for forced and child labour once the involvement of foreign-based companies to provide materials and personnel to the Project is confirmed (or require the Construction Contractor to undertake this task).	Avoidance of a risk that foreign-based companies who are 'primary suppliers' to the Project violate the EBRD's and national labour policies	EBRD PR2	NER (or Construction Contractor)	Before construction starts	Supply chain risk assessment
2.4	<b>Sveti Nikole-Veles Section</b> Oblige the Construction Contractor to arrange temporary on-site facilities for workers in line with the EBRD requirements.	Safe working conditions of on-site workers	EBRD PR2 and PR4, national regulations.	NER, Construction Contractor	Include in the tender documents	On-site facilities for workers available and assessed for compliance
2.5	<b>Interconnector</b> <ul style="list-style-type: none"> <li>Oblige the Construction Contractor to develop a Worker Accommodation Plan (depending on the accommodation strategy to be used) to set out the standards for workers accommodation and specific management measures (should the accommodation be required).</li> <li>Review and approve this plan prior to implementation.</li> </ul>	Safe living conditions of workers	EBRD PR2, EBRD / IFC <sup>5</sup> Guidance Note: Worker's Accommodation: Processes and Standards (2009)	NER, Construction Contractor	Include in the tender documents	A Worker Accommodation Plan developed and implemented
<b>Construction phase</b>						
2.6	<b>All sections</b> Inspect the worker accommodation conditions and mobile on-site facilities for workers against the lenders standards quarterly, as part of the Project's E&S monitoring scheme and	Safe working and living conditions of workers	EBRD PR2, EBRD / IFC Guidance Note: Worker's Accommodation: Processes and Standards (2009)	NER with support of Supervision Contractor	<i>During construction</i>	Inspection records

<sup>5</sup> International Finance Corporation.

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	contractor management procedure. Keep records.					
2.7	<b>All sections</b> Monitor the labour performance and working conditions of contractors quarterly. Keep records.	Safe working and living conditions of workers	EBRD PR2	NER with support Supervision Contractor	<i>During construction.</i>	Monitoring records
<b>PR3</b>	<b>Resource Efficiency and Pollution Prevention and Control</b>					
	<b>Pre-construction phase</b>					
3.1	<b>All sections</b> Develop and implement Soil Management Plan, including erosion prevention measures, soil reinstatement and rehabilitation of disturbed land post construction.	Soil resources	EBRD PR 6	Contractor – develop Plans;  NER and the Construction Supervisor - review and approve the Plans;  EBRD to review and provide comment on the Plans, which NER and their contractor must address.	<i>Include the provision to develop a plan in tender documents; development of the plan – prior to construction, implementation of the plan - during construction.</i>	No reduction in soil fertility across pipeline footprint
3.2	<b>All sections</b> Develop and implement an Air Quality and Greenhouse Gas Emissions Management Plan.	Air quality	EBRD PR 3			No sustained reductions in air quality and no complaints about dust
3.3	<b>All sections</b> Develop and implement a Noise and Vibration Management Plan.	Noise disturbance and possible building damage	EBRD PR 3			No damage to existing buildings or structures
3.4	<b>All sections</b> Develop and implement a Waste Management Plan.	Waste	EBRD PR 3			Overall reduction in waste generated and confirmation of safe disposal of waste that required disposal
3.5	<b>All sections</b> Develop and implement a Hazardous Materials Management Plan including spill prevention and countermeasures and ensure that sites have adequate clean up kits available to deal with a spill.	Soil, surface and ground water	EBRD PR 3,			No loss of containment of hazardous materials on the construction sites. No contamination of ground and/or surface water. No untreated spills on the construction site.
	<b>Construction Phase</b>					
3.6	<b>All sections</b> Cross all natural water courses using a Horizontal Directional Drilling with no disruption	Riverine habitats protection	EBRD PR 6, PR3	Construction Supervisor and NER to ensure;	Prior to river crossings	No loss of riverine habitat as a result of the river crossing

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	of the natural stream bed. No vehicles are to be allowed to drive across such natural water courses. Temporary bridges can be constructed provided that they do not destabilise the river banks and cause erosion.			Construction Contract to implement		
3.7	Ensure no refuelling takes place or any hazardous materials are stored or handled in the water protection and buffer zones.	Water protection	EBRD PR3	Construction Supervisor to ensure; Construction Contractor to implement	During the site planning and construction phases	Water quality parameters correspond to baselines
<b>PR4</b>	<b>Health, Safety and Security</b>					
	<b>Pre-construction and construction phase</b>					
4.1	<b>All sections</b> Develop and implement a Construction Phase Occupational Health and Safety Management Plan.	Proper management of OHS hazards and risks	EBRD PR 4, national, and EU requirements	Contractor to develop Plans;  NER and the Construction Supervisor - review and approve the Plans and monitor implementation;	Include the provision to develop a plan in tender documents; development of the plan – prior to construction and implementation of the plan during construction	Annual reporting on any OHS incidents. No injuries, fatalities, or adverse health effects to construction workers
4.2	<b>All sections</b> It is assumed that the pipeline sections will be welded and coated outside of the trench and as such it will not be necessary for workers to get into the trench. If it is necessary for workers to enter the trench, action must be taken to prevent a collapse of the trench wall and other possible hazards.	Worker safety	EBRD PR 4, national, and EU requirements			Annual reporting on any OHS incidents. No injury to workers as a result of a trench collapse
4.3	<b>All sections</b> Identify access roads to be used for the transportation of equipment and machinery and document their condition. Conduct Road Safety Audit to ensure Project-related traffic does not deteriorate the quality of the roads, causes an increased noise, vibration or risk of traffic jams and accidents.	Prevention of road safety accidents	EBRD PR 4, national, and EU requirements			Findings of the Road Safety Audit are reported and required follow-up actions approved and implemented by contractors
4.4	<b>All sections</b>					

No.	Action	Environmental & Social Risks (Liability / Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	Develop and implement a Construction Phase Traffic Management Plan. Base this Plan on the above-mentioned Road Safety Audit of the potential Project's construction traffic routes.	Safety and/or adverse health effects to third parties	EBRD PR 4, national, and EU requirements			Annual reporting on any OHS and community incidents. Construction Phase Traffic Management Plans developed and implemented.
4.5	<b>All sections</b> Ensure that the Construction Contractor commits to the development of a Construction Phase Security Management Plan to address pipeline and above-ground installations integrity and security and prevent any unauthorised access. All security guards will need to be vetted and trained on UN Voluntary Principles Security and Human Rights Implementation.			NER and Supervisor		No adverse health effects, no injuries and no complaints from third parties as a result of the pipeline project.
4.6	<b>All sections</b> Ensure that the Construction Contractor develop and implement the Worker Code of Conduct.			NER with support of Supervision Contractor	Prior to construction works & upon hiring new workers	
4.7	<b>All sections:</b> Request contractors to complete a Full Safety Design Study and Hazards and Operability Study (HAZOP/HAZID) and Safety Integrity Level (SIL) assessment and ensure that the recommendations be implemented.	Operational safety risks	EU requirements including EN1594:2013 and other applicable EU technical standards and directives (e.g. ATEX Directive 2014/34/EU).	Contractors – develop assessments; NER and the Construction Supervisor - review and approve the Plans and ensure implementation	Before construction starts	Findings of HAZOP and HAZID studies are reported and any follow-up actions incorporated into relevant technical specifications, method statements, E&S and health and safety plans, etc. No abnormal operations that present a risk of human injury or environmental damage
4.8	<b>All sections</b> Develop and implement a Construction Phase Emergency Preparedness and Response Plan based on results of the modelling of risk factors (i.e. location of the pipeline and above-ground installations, their vicinity to areas susceptible	Abnormal events and accidents	EBRD PRs 4 and 3, national and EU requirements	Contractor – develop Plans; NER and the Construction Supervisor - review and approve the	Develop prior to construction works and implement during construction	Construction Phase Emergency Preparedness and Response Plan developed and implemented.

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	to extreme weather events or natural hazards, other high-risk industrial installations, and so forth).			Plans and monitor implementation		Annual reporting on any OHS incidents. No adverse health effects, and no injuries as a result of emergency incidents. In the event of injury rapid and effective evacuation and immediate medical care.
	<b>Operational Phase</b>					
4.9	<b>All sections</b> Develop and implement an Operational Phase Emergency Preparedness and Response Plan based on risk modelling and parameters such as actual location and capacity of the pipeline infrastructure, prevailing meteorological conditions, vicinity of sensitive receptors and other high risk industrial activities, that might heighten the risk and exacerbate the emergency, extreme weather events and susceptibility of the Project areas to natural hazards.	Operational health and safety risks	EBRD PR 4, national, and EU requirements	NER (pipeline operator)	Before operation starts	Operational Phase Emergency Preparedness and Response Plan in place
4.10	<b>All sections</b> Develop and implement an Operational Occupational Health and Safety Plan.					Operational Phase Occupational Health and Safety Plan in place
<b>PR5</b>	<b>Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</b>					
	<b>Pre-construction phase</b>					
5.1	<b>All sections</b> Prepare section-specific Livelihood Restoration Plans (LRPs) based on principles and requirements stipulated in the Project Livelihood Restoration Framework (LRF), agree the LRPs with EBRD, allocate required budget for LRPs and implement them.	Avoiding impact on livelihoods of the Project-affected people (PAP) Prevention of conflict / improving relations with the PAPs	PR5 National legislation	NER with support of the Livelihood Restoration Consultants and in cooperation with the relevant authorities	Development - once the detailed design is confirmed per section; compensation - prior to construction. Implementation and monitoring during	The LRPs developed, in consultation with PAPs, agreed with the EBRD, disclosed and implemented

No.	Action	Environmental & Social Risks (Liability / Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
					construction and onwards	
5.2	<b>Corporate level</b> Hire a competent resettlement/livelihood restoration expert, experienced in the implementation of LRPs compliant with EBRD PR5, to train the NER staff responsible for supervising and/or implementing the LRF and LRPs.	Building capacity on implementing land acquisition and livelihood respiration per EBRD requirements	PR 5	NER	When developing and implementing the LRPs	NER staff trained and evidence of this provided.
5.3	<b>Gostivar-Kicevo Section</b> Re-align the Gostivar-Kicevo Section so that to avoid any physical resettlement and minimise economic displacement.	Avoidance of physical resettlement	PR 5	NER	During the design work	No physical resettlement triggered.
	<b>Construction phase</b>					
5.4	<b>All sections</b> Regularly monitor performance of the Construction Contractor in terms of impacts on land and assets and oblige the Construction Contractor to remediate any damage in line with the LRF and LRP requirements.	Avoidance of impacts and proper monitoring	PR 5	NER and Supervision Contractor	<i>during site preparation and construction</i>	No damage occurs or remains uncompensated / unremedied
5.5	<b>All sections</b> After the completion of the LRPs, commission independent experts (organisations) to conduct a Resettlement Completion Audit.	Evaluating the effectiveness of the LRPs delivery and ensure no negative impacts on the PAPs	PR5	The PIA / the Company / Third-party experts	Toward/upon completion of the LRPs as per the schedules proposed therein	The Terms of Reference for the Completion Audit agreed with the EBRD Audit report provided to the EBRD for review
<b>PR6</b>	<b>Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>					
6.1	<b>Interconnector:</b> Ensure the implementation of the BAP, including dedicated biodiversity mitigation and monitoring actions, for the Interconnector. Ensure qualified staff are nominated for biodiversity monitoring and relevant budget approved.	Biodiversity loss	EBRD PR 6	NER, with support of consultants	As indicated in the E&S documents: during pre-construction, construction and operations.	Due implementation of the BAPs; No damage to highly sensitive habitats, no net loss of natural habitats and net gain of critical habitats.

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6.2	<p><b>Sveti Nikole-Veles Section:</b> Ensure the implementation of the BAP, including dedicated biodiversity mitigation and monitoring actions for the Sveti Nikole-Veles Section. Ensure qualified staff are nominated for biodiversity monitoring and relevant budget approved.</p>					Ensure legal protection status and relevant industrial development activities restrictions are verified and documented prior to the land clearance and construction and inform the BAPs in line with the adaptive management principle
6.3	<p><b>All sections</b> Define a maximum length of open trench ahead of the pipeline construction and backfilled area and maintain that length throughout the construction phase. If there is a delay in the pipe installation then trench excavation must be similarly delayed. This to reduce the risk of animals falling into an open trench.</p>			Construction Contractor and Supervision Contractor		Monitoring data for invasive species vi-a-vis the baseline prior to the construction is collected and acted upon Monitoring data for any animal carcasses identified at the project sites is collected and analysed and relevant mitigations measures developed
6.4	Install suitable barriers around the trenches and any excavations and provide safe passage for animals.					
6.5	<p><b>All sections</b> Implement erosion prevention measures on steep slopes both to prevent erosion and to protect the stability of the trench.</p>					Regular monitoring and reporting on the effectiveness of erosion prevention measures, especially after the extreme weather events (e.g. excessive precipitation; spring thaws, flooding, landslides, earthquakes, etc.)
6.6	<p><b>All sections</b> All natural habitats lost as a result of the pipeline require no net loss of such habitat as the final outcome of the project.</p>					Areas of the critical habitat types affected by the project are larger once the project is completed than they were when the project started.
6.7	<p><b>All sections</b> All critical habitat lost as a result of the pipeline requires net gain of such habitat as the final outcome of the project.</p>					
6.8	<p><b>All sections</b> All areas identified as very high sensitivity habitats are to be completely avoided by the pipeline routing. If avoidance is not possible</p>					

No.	Action	Environmental & Social Risks (Liability / Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	then no construction should take place during sensitive seasons and the working strip should be reduced to a minimum. All sensitive areas should be mapped and signposted to ensure the construction contractors abide by restrictions and mitigation measures as included in BAPs.					
6.9	<p><b>All sections</b> The formal protection status of sites identified as potential Emerald Sites that are directly affected by the pipeline footprint must be determined together with the specified protection requirements. The protection requirements must be applied to the project and fully complied with, even if that means rerouting the pipeline.</p>					
<b>PR8</b>	<b>Cultural Heritage</b>					
	<b>Pre-construction phase</b>					
8.1	<p><b>All sections</b> Ensure that the Chance Find Procedure is integrated into tender documents and its implementation is supervised. Include the requirement on a Chance Find Procedure training in the contractual documentation.</p>	Preventing damage or destruction of cultural heritage	EBRD PR 8 and national legislation	NER	Prior to tendering; training of the contractors - prior to construction; implementation during construction	Relevant training provided to construction contractors and procedure applied
8.2	<p><b>Gostivar-Kicevo Section</b></p> <ul style="list-style-type: none"> <li>Ensure that the ongoing re-alignment of the Gostivar-Kicevo Section would avoid impacts on cultural, including archaeological, heritage.</li> <li>Assess impacts of the re-alignment on cultural heritage and develop due mitigation in the new ESIA.</li> </ul>	Avoidance impacts on cultural heritage	EBRD PR 8 and national legislation	NER	During re-alignment design works	The new ESIA contains assessment of impacts on tangible and intangible cultural heritage and due mitigation
<b>PR10</b>	<b>Information Disclosure and Stakeholder Engagement</b>					
	<b>Pre-construction phase</b>					



No.	Action	Environmental & Social Risks (Liability / Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
10.1	<b>All sections</b> Disclose the Project's E&S documents in Macedonian and English for the Interconnector and Sveti Nikole-Veles Section	Improved visibility/ accessibility of the Project documents, improved communication and relations with stakeholders, preventing conflicts / complaints	EBRD requirement for category A projects	NER	September 2022	Evidence of disclosure provided
10.2	After the E&S documents for the <b>Gostivar-Kicevo Section</b> are prepared, disclose them for 120 days in Macedonian, Albanian and English, together with the updated Stakeholder Engagement Plan (SEP), Non-technical Summary (NTS), LRF and ESAP.		EBRD requirement for category A projects	NER, Consultant	Once the E&S documents are ready	Evidence of disclosure provided
<b>During Project lifecycle</b>						
10.3	<b>All sections:</b> Implement the Project SEP. Review, update and disclose the SEP, as necessary, e.g., following the disclosure period to integrate the received feedback and/or adjust engagement strategies; prior to commissioning the gas pipeline sections; when new stakeholders are identified; or when changes to the Project occur and/or new E&S information becomes available.	Preventing conflicts / complaints, improving relations with stakeholders and reducing risk of impact on communities	EBRD PR10, EBRD 2019 Access to Information Policy and Directive	NER	Start implementing at the design stage and continue throughout the Project	Stakeholder engagement records; The SEP updated and disclosed as relevant
10.4	<b>All sections:</b> Document stakeholder engagement events for the Project and maintain a communication logbook/stakeholder engagement records.		EBRD PR10	NER		Stakeholder engagement records
10.5	<b>All sections:</b> Implement the grievance procedure for external stakeholders in line with EBRD PR10, to include, inter alia, anonymous and confidential grievance channels.		EBRD PR10	NER		The grievance procedure developed and implemented (and can be accessed on the website) A Grievance Log maintained to reflect the status of each grievance and actions taken Grievance results reported annually

