

**Table Error! No text of specified style in document.-1 - ESAP (updated version)**

NO.	ACTION	ENVIRONMENTAL & SOCIAL RISKS (LIABILITY / BENEFITS)	REQUIREMENT (LEGISLATIVE, EBRD PR, BEST PRACTICE)	RESOURCES, INVESTMENT NEEDS, RESPONSIBILITY	TIMETABLE	TARGET & EVALUATION CRITERIA FOR SUCCESSFUL IMPLEMENTATION
<b>CORPORATE LEVEL</b>						
1	Prepare and submit reports on status of this Environmental and Social Action Plan, resolution of grievances and EHSS performance of the project.	Monitoring of ESAP implementation and EHSS performance	EBRD PR1-10	Regia Autosalubritate (The Beneficiary) and PIU	Annually	Submit reports on progress of implementation of ESAP, grievance resolution & EHSS performance (to EBRD)
2	Finalise a draft employment (HR) policy that has been developed. A final agreed and formalised policy should be implemented that promotes equal opportunities, and diversity in recruitment and career development. In addition, the policy should cover areas such as discrimination, employment of young persons, wages (wage levels, normal and overtime), working hours, benefits, grievance mechanism for workers, dismissal, trade union recognition, collective bargaining, health and safety, harassment, forced labour, bullying, stress, bribery and corruption etc.	Social and employment Policies	Best practice EBRD PR2	Regia Autosalubritate, and external consultant (Seureca)	End of 2022	Final agreed and formalised employment (HR) policy
3	<p>Disclose the revised SEP and implement the revised SEP and regularly update the document as new information becomes available and stakeholder engagement activities are undertaken such as those planned in the Stakeholder Participation Programme (SPP) to be developed and implemented by a third party consultant.</p> <p>The grievance mechanism in the SEP should be implemented if there are complaints.</p>	Ensure that people are informed and consulted about environmental and social issues related to the Project and that grievances are addressed in a transparent and timely manner.	Best practice EBRD PR 10	Regia Autosalubritate, PIU E&S Consultant and external consultant (Seureca)	<p>Previous versions of the SEP were disclosed in August 2017 and March 2018.</p> <p>Disclose new revised SEP by the end of July 2022.</p> <p>Implementation throughout project implementation period</p>	<p>Revised SEP to be disclosed</p> <p>Grievance log and grievance management reports</p>
4	<p>Assign staff with EHS management responsibilities, provide training and undertake recruitment as required. Update corporate EHS organisational structure.</p> <p>Ensure site level EHS management responsibilities for all the investment sites namely Tintareni landfill, Ciocana dump site and</p>	Clear management of EHS issues	Best practice EBRD PR1 and PR2	Regia Autosalubritate and external consultant (Seureca)	Prior to commencement of any new activities on the site.	Staff employed, trained and appointed roles. CVs provided and approved.

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	other new plants that will be built.					
5	<p>Compensate any damages made to land surrounding the Ciocana waste dump site for construction works to fully reinstate the land following the works that has already taken place to close the site in 2017 and for any other construction works thereafter related to the site closure.</p> <p>Ensure that there is on-going communication with all affected and interested parties for any on-going construction works relating to either the site closure or to the reinstatement of the land. (Ciocana waste dump site)</p>	<p>Ensure that no economic displacement occurs for owners / users of land surrounding the Ciocana waste dump site.</p> <p>Ensure effective communications with owners / users of land surrounding the Ciocana waste dump site.</p>	EBRD PR 1 and 5 Best practice	Regia Autosalubritate, PIU E&S Consultant and external consultant (Seureca)	During any on-going construction works including works to fully reinstate the land at the Ciocana waste dump site.	<p>Any damages to land outside of the Ciocana waste dump site are compensated and land is restored.</p> <p>Monitoring reports on ESAP implementation.</p> <p>SEP, SPP and Communication Records.</p>
6	<p>Ensure that all community benefits for residents of Tintareni village are implemented, as agreed with the community.</p> <p>Ensure that there is on-going communication with the community on the plans for implementing community benefits and progress of implementation.</p>	Ensure that the local community accepts the Project and the re-opening of the Tintareni landfill	EBRD PR 1 Best practice	City of Chisinau, Regia Autosalubritate, PIU E&S Consultant and external consultant (Seureca)	Prior to Project becoming effective and throughout Project implementation.	<p>Monitoring reports on ESAP implementation.</p> <p>SEP, SPP and Communication Records.</p>
7	<p>Develop an approved supplier list and implement the Procurement Plan that has been developed.</p> <p>As part of the tendering process, an assessment of the EHS management policies, procedures and management capacities should be undertaken.</p> <p>All future contractors should have a Construction, Environmental Management Plan (CEMP) that should also include a Transport Management Plan.</p> <p>There should be periodic inspections of the subcontractors to ensure that there is compliance with national laws and EBRD's PR2.</p>	<p>Minimise Health and Safety risks</p> <p>Reduce injuries</p>	Best practice EBRD PR1, EBRD PR2	Regia Autosalubritate, PIU Procurement Consultant and external consultant (Hydroplan)	On issue of tenders Inspections on-going thereafter	<p>Approved Suppliers List</p> <p>Procurement Plan</p> <p>Tender specification</p> <p>Inspection reports</p>
8	Develop and implement an Environmental and Health and Safety management system in line with best practice outlined in ISO 14001 and OHSAS 18001.	Improvement of EHS performance	Best practice EBRD PR1,	Regia Autosalubritate PIU E&S Consultant and external	End of 2023	<p>E&amp;S Policy</p> <p>ESMS</p>

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	This should include an audit program for the EHS management system and legal compliance to be undertaken by an external consulting company to identify gaps and opportunities for Improvement.		paragraph 1,2  EBRD PR 2 paragraph 15	consultant (Seureca)		Audit Program
9	Prepare and adopt a medium-term investment programme for developing a separate waste / recyclable collection system and a waste minimisation, recycling and re-use scheme. This should investigate alternative waste treatment methods, such as mechanical-biological waste treatment. Options and solutions for the segregation and management of hazardous waste should also be considered.	Compliance to EU legislation and guidance	Waste Framework Directive  Landfill Directive  EBRD PR3	Regia Autosalubritate and external consultant (Hydroplan)	End of 2024  Secure loan for EU compliant landfill for design and construction and operations to commence – by end of 2022	Investment programme Report on options, assessment and outcomes  Recycling figures and targets
<b>SITE SPECIFIC (all sites unless specified)</b>						
10	Ensure that all environmental permits are in place at the appropriate stage of development for Tintareni Landfill or closure for the temporary dump site. This should include but not be limited to operational, building and closure permits.  This should also include obtaining the necessary permits including a new Environmental Agreement from the Environmental Agency which expires at the end of July 2022 for the Tintareni Landfill site and specialised permits from the Ministry of the Environment when leachate treatment plants are fully operational and prior to any discharge of treated leachate from both the Tintareni landfill site and Ciocana dumpsite to the environment.	Compliance to EU guidance and National legislation	EBRD PR1  Moldova Permitting Regime	Regia Autosalubritate and PIU E&S Consultant	Prior to commencing activities for which permits are required	Permits  Regulatory correspondence
11	Develop a H&S programme, taking into account the relevant gender issues that includes a H&S risk assessment for all sites to include: <ul style="list-style-type: none"> <li>▪ Robust training to ensure competent staff are used on site who are fully conversant with operational procedures, risk assessments and control measures necessary;</li> <li>▪ Personal Protective Equipment provided should be appropriate for the task and worn by all staff and contractors (e.g. sharps gloves, dust masks and eye protection);</li> <li>▪ Visitors to be provided with PPE;</li> <li>▪ All pedestrian walkways and vehicle access areas should be clearly marked;</li> </ul>	Compliance to EU and National legislation  Minimise injuries/fatalities due to accidents	EBRD PR 2	Regia Autosalubritate PIU E&S Consultant & Procurement Consultant and external consultants (Seureca and Hydroplan)	Full documented system covering all current and future activities on site should be implemented as part of detailed design and operating procedures prior to commencement of any new activities on the site, and	Report on findings of the review along with any remedial measures and timescales for their implementation

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	<ul style="list-style-type: none"> <li>■ All portable electrical equipment should be assessed for condition and signs of wear and damage and suitability for use;</li> <li>■ The location and number of first aid kits required;</li> <li>■ The location and number of fire extinguishers required;</li> <li>■ Sun protection and drinking water for workers; and</li> <li>■ Development of procedures for working in confined spaces;</li> </ul> <p>Specifically, for the Tinternai Landfill Site:</p> <p>The Construction Health and Safety Plan should incorporate additional measures for effective communication and management of health and safety across the whole site. Where possible, there should be segregation of construction activities and landfill activities, to reduce the health and safety risks to all workers on the site.</p> <p>The H&amp;S risk assessments should also consider the risk of air quality impacts from Tintareni landfill on the construction workers, who will now be working adjacent to an operational landfill site (as it is assumed that the site will continue to accept waste whilst being engineered).</p> <p>The Construction Traffic Management Plan should include measures to regulate the flow of construction and waste vehicles.</p>				commencement of work of any contractors.	
12	<p>Ensure the design and operating procedures are in full compliance with the Landfill Directive and this is in a detailed Design and Develop Landfill Operating Manual (DDLOM) that is developed that covers:</p> <ul style="list-style-type: none"> <li>■ Security;</li> <li>■ Accident Management Plan;</li> <li>■ Waste characterisation, handling, acceptance, inspection and quarantining. Ensure contract in place detailing waste acceptance criteria and periodic sampling of wastes;</li> <li>■ Control of dust and aerosols including monitoring, suppression and early restoration;</li> <li>■ Stability risk assessment;</li> <li>■ Site traffic management;</li> <li>■ Litter Control;</li> <li>■ Prevention of mud on road;</li> <li>■ Odour control;</li> </ul>	Design and operation standards, E&S monitoring	Landfill Directive EBRD PR3	Regia Autosalubritate, PIU E&S Consultant, Design contractor(s) and external consultant (Hydroplan)	Full documented procedures covering all current and future activities on site should be developed as part of detailed design and operating procedures prior to commencement of any new activities on the site. Interim procedures, management and monitoring plans should be reviewed, updated and finalised.	Detailed Design and Develop Landfill Operating Manual (DDLOM)

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	<ul style="list-style-type: none"> <li>■ Noise and vibration control;</li> <li>■ Pest control;</li> <li>■ Surface Water (run-off) Control Plan;</li> <li>■ On-going monitoring of leachate (raw and treated leachate), groundwater, surface water and landfill gas (results should be independently audited and be made available in the public domain). Develop monitoring plans of all the above that details objectives, standards, locations, frequency, required monitoring infrastructure and response to any significant impact events. Adopt a risk based approach to determine if monitoring plans are required for noise and odour; and</li> <li>■ Emergency Preparedness and Response Plan.</li> </ul> <p>These should include a design control process and an Operational Environmental Management Plan (OEMP). (Tintareni Landfill Site).</p>					
13	<p>Incorporate into the detailed design the following:</p> <ul style="list-style-type: none"> <li>■ Interim lining specification to be supported by geotechnical assessment;</li> <li>■ Detailed design required for lining and drainage;</li> <li>■ Prior to capping, remediate if evidence of uncontrolled release of leachate or landfill gas;</li> <li>■ An assessment of gas flows after 1-2 years should be conducted to determine whether a gas engine(s) are viable taking into quality and quantity of gas and whether for export to grid or site use (including for future activities such as a sorting / MBT plant) with CAPEX as required. The assessment should determine if the current system can be used or a new gas utilisation plant would need to be designed and installed. This should be followed by a detailed design of a gas engine plant (if viable) to meet ELVs if it falls under the MCPD and minimisation of GHG emissions; and</li> <li>■ Strengthen dam and dam slope using Geogrid and install sealing liner (this requirement should be undertaken as soon as possible due to the fact that the landfill has already re-opened for the acceptance of waste).</li> </ul> <p>(Tintareni Landfill Site)</p>	Design and operation standards, E&S monitoring	Landfill Directive EBRD PR3	Regia Autosalubritate, Design contractor(s) and external consultant (Hydroplan)	Full documented procedures covering all current and future activities on site should be developed as part of detailed design and operating procedures prior to commencement of any new activities on the site.	DDL0M
14	Measures should be developed for the transport of waste to prevent risk to public with regards to dust nuisance, falling out litter and	Reduce potential accidents for	EBRD PR2	Regia Autosalubritate and external	August 2022	Report on the measures to be implemented

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	leakage of waste leachate from vehicles. Vehicle loads should be sheeted and dampening down of access roads should be undertaken if conditions are dusty. New vehicles should be procured with the relevant specifications. (Tintareni Landfill Site, transfer station and sorting station)	employees and the public		consultant (Hydroplan)		
15	<p>Ensure the tariff structure for waste collection from households is set at an appropriate level of average income per capita (no more than 2%). Monitor income and tariffs.</p> <p>Develop a monitoring protocol for monitoring affordability with data collection to assess affordability and the performance of the tariff collection system. Develop a procedure for setting and adjusting of the tariffs, billing and collection of payments. Introduce incentivisation schemes to encourage payment and enforcement actions for non-payment / illegal dumping. Implement targeted public awareness campaigns and education activities.</p> <p>(Tintareni Landfill Site)</p>	Socio-economic impacts	EBRD PR1	Regia Autosalubritate, PIU and external consultant (Seureca)	Prior to commencement of any new activities on the site and implement during landfill operation	<p>Reports on tariff procedure, monitoring on affordability, collection rates, incentivisation schemes and penalties.</p> <p>Waste Services Tariff methodology including finalised annual tariff calculation tool for future use</p> <p>Affordability Policy</p>
16	<p>Disclose the new E&amp;S Supplementary report.</p> <p>Implement all mitigation measures identified in the final ESIA as detailed in the ESMP, a live document that should be used to document and monitor the implementation of mitigation measures in the final ESIA. It should cover:</p> <ul style="list-style-type: none"> <li>■ Air quality and climate change;</li> <li>■ Noise and vibration;</li> <li>■ Biological and ecological resources;</li> <li>■ Cultural heritage;</li> <li>■ Landscape and visual;</li> <li>■ Geology, soils, material and waste;</li> <li>■ Water environment;</li> <li>■ Traffic and transportation;</li> <li>■ Community Health and safety;</li> <li>■ Occupational Health and safety; and</li> <li>■ Social and population.</li> </ul> <p>(Tintareni Landfill Site)</p>	Environmental Impact Assessment	International ESIA Expertise  EBRD PR1	WSP has developed an ESIA, ESMP and other component studies and a subsequent E&S Supplementary Assessment Report	<p>Draft ESIA Disclosure - March 2017</p> <p>Final ESIA - December 2017</p> <p>previous E&amp;S Supplementary Assessment Report Disclosure - March 2018</p> <p>Implementation throughout project implementation period – design, construction and operation</p>	E&S Supplementary Assessment

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17	<p>Investigate stability of previously deposited waste/clay and new waste to ensure the integrity of any new lining system will be maintained (Tintareni Landfill Site)</p> <p>Review waste slopes and the degree of re-profiling required to achieve a stable landfill slopes and a suitable landform on which to place capping materials (Tintareni Landfill Site and Ciocana Dump Site)</p>	Design and operation standards, E&S monitoring	Landfill Directive  EBRD PR3	Regia Autosalubritate, Design contractor(s) and external consultant (Hydroplan)	As part of detailed design and prior to commencement of any new activities on the site.	Detailed Design
18	<p>For the leachate treatment plant at Tintareni Landfill Site and Ciocana dumpsite undertake the following:</p> <ul style="list-style-type: none"> <li>■ Provide more detailed design information on leachate collection system, particularly of how Phase 1 leachate collection system will be maintained;</li> <li>■ Demonstrate the design for leachate treatment plants meets BAT;</li> <li>■ Continue to undertake regular monitoring of the treated discharge and compare against relevant Moldovan and EU Environmental Quality Standards / Water Quality Standards;</li> <li>■ If relevant Moldovan and EU Environmental Quality Standards / Water Quality standards will not be met, assess additional treatment stages required; and</li> <li>■ Ensure compliance with the water quality limits prior to discharge of permeate to the environment.</li> </ul> <p>(Tintareni Landfill Site and Ciocana dumpsite)</p>	Design and operation standards, E&S monitoring	Landfill Directive EBRD PR3	Regia Autosalubritate and Design contractor(s) and external consultant (Hydroplan)	As part of detailed design and prior to commencement of any new activities on the site.	Detailed Design BAT Review Report  Leachate Monitoring Results
19	<p>Develop and implement the Closure Plan that covers the mitigation measures detailed in the ESIA, Appendix A - Review of Ciocana Closure Plan. In addition it should address:</p> <ul style="list-style-type: none"> <li>■ On-going monitoring of leachate, groundwater, surface water and landfill gas (results should be made available in the public domain). Review the frequency and duration of the monitoring including action / trigger levels for monitoring. Consider monitoring for lateral migration and surface emissions. Landfill gas monitoring from gas wells to include flow rate and pressure plus ambient meteorological conditions. Also undertake trace gas monitoring to assess potential odour / health risks and also qualitative odour monitoring (sniff tests). Undertake monitoring of</li> </ul>	Design and operation standards, E&S monitoring	Landfill Directive  EBRD PR3	Regia Autosalubritate and Design contractor(s) and external consultant (Hydroplan)	As part of detailed design and prior to commencement of any new activities on the site.  On-going leachate monitoring results	Detailed Design  Leachate Monitoring Results

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	<p>flare gas emissions to compare to emission limits;</p> <ul style="list-style-type: none"> <li>▪ Investigate base of waste mass and if leachate is being intercepted and all leachate is being sent to on site leachate treatment plant that has been installed;</li> <li>▪ Undertake a Stability Risk Assessment;</li> <li>▪ Review the final sealing cap to create the ‘impermeable layer’;</li> <li>▪ Implement Construction Quality Assurance testing; and</li> <li>▪ Design spacing of waste gas extraction wells for optimal collection efficiency.</li> </ul> <p>(Ciocana Dump Site)</p>					
20	<p>Prepare and implement a coordinated action plan for the clean-up and closure of existing local dump sites in Tintareni area. Introduce measures to deter future illegal dumping such as secured sites, information boards, programmes to raise awareness, fines and penalties and installation of appropriate local waste collection infrastructure (Tintareni Landfill Site)</p>	Prevention of illegal dumping. Reducing pollution risks	Landfill Directive EBRD PR3	Regia Autosalubritate, PIU and external consultant (Hydroplan)	Clean up and closure prior to commencement of any new activities on the site.	Dump Site Closure Plan (DSCP) in place Quarterly progress reports
21	<p>Report on agreement on the local benefits that should be introduced for the communities in Tintareni. These should cover:</p> <ul style="list-style-type: none"> <li>▪ Free of charge waste collection</li> <li>▪ Gate fee tax pay to Tintareni Mayor’s Office</li> <li>▪ Regularly clean cesspits at the wastewater facilities of Tintareni public institutions</li> <li>▪ Payment for land lease;</li> <li>▪ Rehabilitation and management of water supply system</li> <li>▪ Building of a Family Doctors Centre</li> <li>▪ Hiring the local people for the landfill operation.</li> </ul> <p>(Tintareni Landfill Site)</p>	Community benefits	EBRD PR2 and PR4	City of Chisinau, Regia Autosalubritate, PIU and external consultants (Seureca and Hydroplan)	By end of 2024	Report on agreement
22	<p>Include in tendering documents the requirement for contractors to develop procedures/method statements for the project to manage the EHSS issues and mitigation measures identified including but not limited to the below, adopting international best practice in line with Moldovan legislation and the EBRD PRs:</p> <ul style="list-style-type: none"> <li>▪ EHSS procedures;</li> <li>▪ Labour, working and worker accommodation conditions;</li> <li>▪ Community safety and security;</li> <li>▪ Supply chain sustainability;</li> </ul>	Minimise Health and Safety risks  Reduce injuries	Best practice  EBRD PR1 and PR2	Regia Autosalubritate, PIU and external consultant (Hydroplan)	During preparation of tender specifications/ dossiers	Tender dossiers

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	<ul style="list-style-type: none"> <li>▪ Grievance mechanism;</li> <li>▪ Consultation and information disclosure requirements in line with the SEP.</li> </ul> <p>As part of the selection process, an assessment of EHS management policies, procedures and management capacities and previous performance should be undertaken.</p>					
23	Prepare and implement a program for raising public awareness and changing behaviour on the following issues: new regional waste management system, waste tariffs for households and other customers, protection of water bodies and irrigation systems from waste dumping and littering, collection of recyclable waste fractions, management of construction and demolition waste, chemicals, asbestos containing materials.	Public outreach program as part of SEP	EBRD PR10	PIU and external consultant (Seureca)	Prior to commencement of any new activities on the site and implement during landfill operation	SEP, SPP, CDP and Communication Records
24	Implement regular contractor inspections / audits and meetings with contractors at least annually to review compliance and advise on corrective actions.	Minimise Health and Safety risks  Reduce injuries	Best practice  EBRD PR2	PIU and external consultant (Hydroplan)	During construction phase	Audit reports
<b>NEW ACTIONS PROPOSED</b>						
25	Prepare and submit a Stability Risk Assessment (SRA) report for the proposed extension.	Assess landfill stability risks in association with the proposed extension	Landfill Directive  EBRD PR3	Regia Autosalubritate and Design contractor(s) and external consultant (Hydroplan)	Prior to commencement of any new activities on the site.	SRA report
26	Prepare and submit a Construction Quality Assurance (CQA) Plan for each of the landfill cell or capping phase prior to construction.	Landfill engineering construction quality	Landfill Directive  EBRD PR3	Regia Autosalubritate and Design contractor(s) and external consultant (Hydroplan)	Prior to construction of each cell or capping	CQA Plan
27	Prepare and submit an updated Water Balance Study report to consider the seasonal variation of the water balances.	Flood risk mitigation	Landfill Directive  EBRD PR3	Regia Autosalubritate and Design contractor(s) and external consultant (Hydroplan)	Prior to commencement of any new activities on the site.	Updated Water Balance Study report
28	Clarification required on what artificially established geological barrier is proposed for the development and how the gas wells are to be installed to ensure the integrity of the geological barrier and the artificial sealing liner.	Geological barrier /artificial sealing liner requirement	Landfill Directive  EBRD PR3	Regia Autosalubritate and Design contractor(s) and external consultant	Prior to commencement of any new activities on the site.	Detailed Design  Clarification on geological barrier and gas well

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				(Hydroplan)		installation
29	Clarification required on whether any leak detection/interception system will be installed as part of the basal lining system. If not, justification will be required.	Leak detection requirement	Landfill Directive EBRD PR3	Regia Autosalubritate and Design contractor(s) and external consultant (Hydroplan)	Prior to commencement of any new activities on the site.	Detailed Design  Clarification on leak detection
30	Clarification required on what capping system will be installed at the site.	Capping system	Landfill Directive EBRD PR3	Regia Autosalubritate and Design contractor(s) and external consultant (Hydroplan)	Prior to commencement of any new activities on the site.	Detailed Design  Clarification on capping system
31	Upgrade the diesel tank within a bunded unit which has sufficient capacity to retain 110% of the capacity.	Compliant storage facility to minimise the risk of a spillage	EBRD PR3	Regia Autosalubritate	End of 2022	Report on upgrade
32	Disclose the revised ESAP.	Ensure that people are informed about the Project development	EBRD PR1-10	Regia Autosalubritate.	Previous version of the ESAP was disclosed in August 2017 and March 2018.  Disclose new revised ESAP by the end of July 2022.	Revised ESAP to be disclosed