



# Construction Environmental Management Plan

CEMP00

November 2012  
Adjaristsqali Georgia LLC (AGL)



Adjaristsqali  
Georgia  
LLC





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1. Abashidze Street 6, 6010 Batumi, Georgia



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# 1. Introduction

## 1.1 Overview

Adjaristsqali Georgia LLC (hereafter referred to as AGL) is undertaking the development of the Adjaristsqali Hydropower Cascade Project (the Project) in the Autonomous Republic of Ajara, Georgia. The Project is expected to have a total installed capacity of 400 MW of renewable energy.

The Project is comprised of three separate hydropower schemes operating in cascade along the Adjaristsqali River. Each scheme consists of a combination of dams and weirs, reservoirs, headrace and transfer tunnels, powerhouse, power evacuation, and access roads.

The primary objective of this Construction Environmental Management Plan (CEMP) is to avoid, mitigate and minimise environmental and social impacts associated with construction activities of the Adjaristsqali Project in line with industry best practice and to provide a vehicle for implementation of various mitigation activities identified in the project Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP).

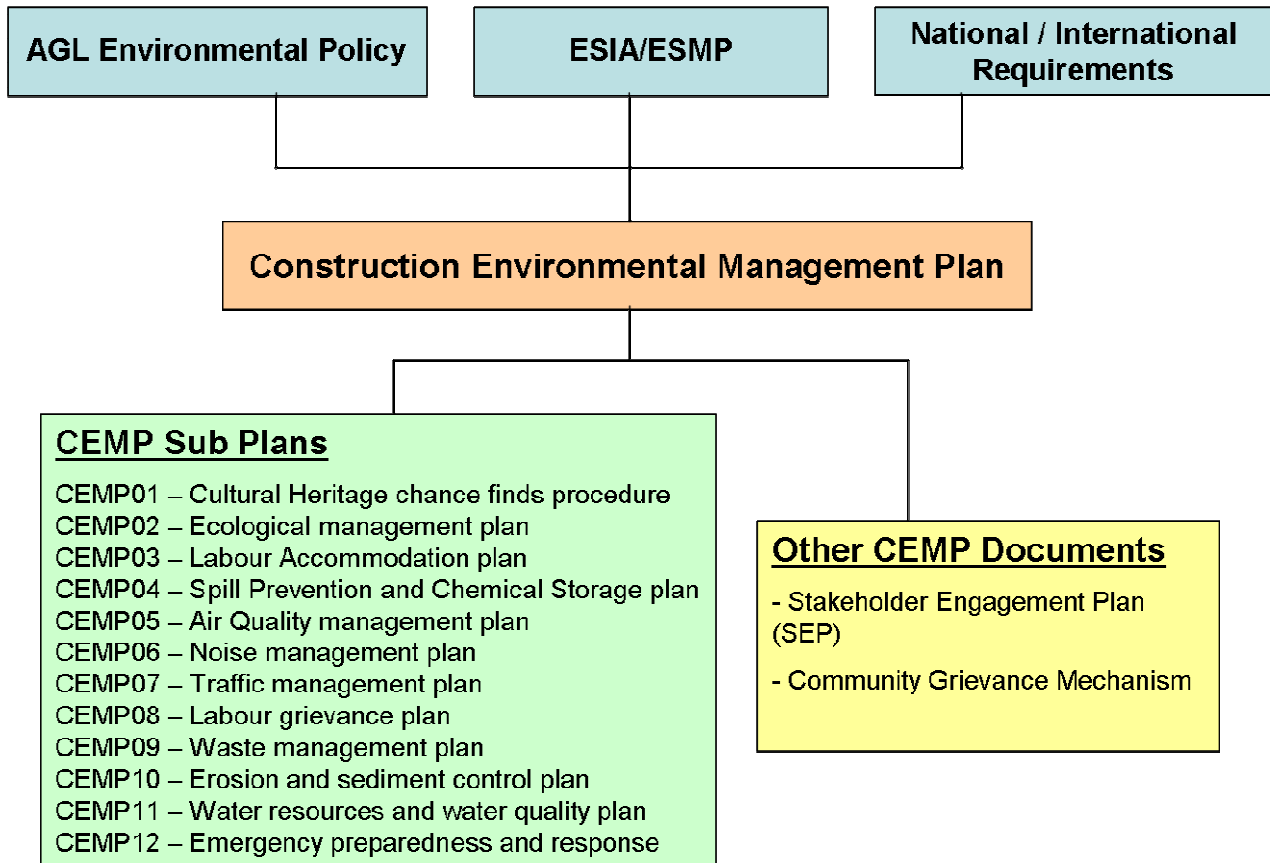
This overarching CEMP provides guidance on the environmental and social management system approach to be adopted by AGL (and its representative the Owner's Engineer, from here on referred to as OE), its Contractor(s), and sub-contractors during the construction phase of the Project. It is supplemented by various sub-plans and procedures which have been developed to address key environmental and social aspects identified during the ESIA process for which detailed control procedures and associated responsibilities are defined for implementation by AGL/OE and its contractors. These environmental and social sub-plans have been prepared as separate stand alone documents.

The process set out within this overarching CEMP, along with the accompanying sub-plans form the basis of the Environmental and Social Management System (ESMS) to be implemented by AGL/OE, its Contractor(s) and their sub-contractors during the construction phase of the Project.

It is the responsibility of AGL/OE to implement the requirements of the CEMP and sub-plans throughout the construction phase and to monitor the performance of its Contractor(s) to ensure they meet the appropriate CEMP requirements. The Contractor(s) are responsible for developing and implementing their own management plans or procedures in line with the requirements of the CEMP and sub-plans as part of their own Environmental, Health and Safety (EHS) Management System.

The CEMP will be applicable to all activities undertaken during the construction phase of the Project and summarised in Figure 1.1 below.

Figure 1.1: CEMP Structure



## 1.2 Scope

The requirements outlined within the CEMP are applicable to all activities undertaken during the construction phase of the Project and are required to be adopted across all components of the Project. This includes:

- Temporary and permanent access roads;
- Development of borrow pits for aggregates and other raw materials;
- All project infrastructure works, powerhouses, dams, reservoirs, intakes, adits, etc.
- Associated Project infrastructure, such as waste water treatment, clean water supply, transmission lines;
- Temporary workers accommodation, workshops and storage areas;
- Temporary laydown areas, storage, and work sites at dam and powerhouse locations;
- Construction site requirements such as utilities and offices;
- Temporary and permanent spoil disposal locations required for significant amounts of material to be excavated from tunnels;
- Batching plants for the production of concrete to support foundation works; and
- Associated transport movements.

### **1.3 Distribution and Review**

AGL/OE will distribute controlled copies of this CEMP to all Contractor(s) and at all main construction site offices within the Adjaristsqali Project for implementation.

A controlled copy of the CEMP will be held centrally within AGL's main office in Batumi.

The CEMP will be reviewed at least annually by AGL/OE and upon any major change in Project activities to ensure that the scope of requirements and responsibilities contained within the plan are applicable and sufficiently incorporated.

## 2. CEMP

### 2.1 Introduction

This overarching CEMP defines the overall environmental and social management system approach for the Project construction phase. It is based on the key principles of the international standards organisation (ISO) standard 14001: 2004 for environmental management systems (EMS), although development of an accredited EMS will only be considered for the operational phase. As an integral part of the overall Project EHS Management System, the CEMP enables environmental and social requirements to be identified, planned, achieved, maintained, documented and when possible, improved.

This CEMP defines the environmental objectives for the Project, describes AGL/OE and its Contractor's responsibilities regarding environmental management, and provides guidance on a consistent approach for managing environmental and social aspects and impacts during the construction phase.

The CEMP takes into account the following:

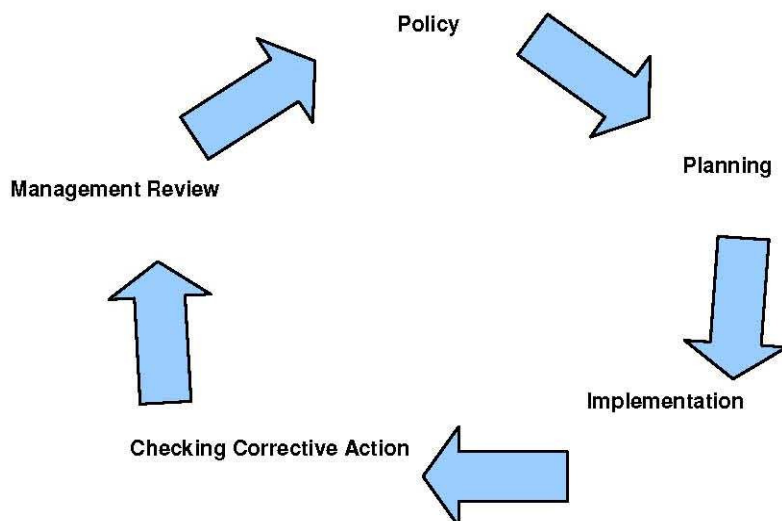
- The size and complexity of the Project scope of work;
- All applicable laws, statutes and regulations;
- All applicable international requirements, including the International Finance Corporation (IFC) Performance Standards on Social and Environmental Sustainability;
- Mitigation requirements as set out in the Project ESIA and ESMP;
- AGL environmental and third party interfaces;
- The risk factors that may be faced during the construction of the Project; and
- The principle of continuous improvement in environmental and social performance.

### 2.2 Environmental and Social Management System Framework

An Environmental and Social Management System (ESMS) establishes what an organisation needs to do in order to meet its environmental, economic and social goals and responsibilities. This CEMP details the AGL ESMS Framework, as shown in Figure 2.1 below, which is organised into a distinct staged process:

- **Policy** – AGL documented commitment related to environmental and social performance;
- **Planning** - Developing performance criteria (objectives and targets) for environmental management and developing responsibilities, strategies, and plans and procedures to meet defined objectives;
- **Implementation** - Implementing the sub-plans and procedures, training employees and contractors, and maintaining records to demonstrate that the system is working;
- **Checking / Corrective Action** - Monitoring the implementation of the sub-plans and procedures to ensure that they are effective and updating components of the ESMS, as needed, when operations, personnel, risks or requirements change; and
- **Management Review** – Regular AGL/OE management team review of Project environmental and social performance.

Figure 2.1: ESMS Framework



The following sub-sections outline how each of these ESMS steps will be implemented by AGL/OE and its Contractor(s) during the construction phase of the Project, indicating as necessary where further details of associated requirements are defined within the CEMP.

### **2.2.1 AGL Environmental and Social Policy**

This policy sets out our commitments and responsibilities as a developer to achieve environmental and social sustainability in our projects. AGL believes that sustainable development is a fundamental aspect of sound business practice and adds value to its activities by working for long-term sustainability through effective environmental and social management. AGL is committed to the principles of corporate transparency, accountability and stakeholder engagement.

AGL prioritises environmental and social issues such as climate change mitigation and adaptation, biodiversity conservation, energy and resource efficiency, poverty alleviation, promotion of decent work practices, reduction of social exclusion and access to basic services, gender equality and social development. Each project that AGL undertakes will be expected to provide benefits to project-affected communities.

AGL will, as a minimum:

- Meet or exceed all applicable national laws and regulations;
- Minimise environmental and social impacts and continually improve environmental and social performance as an integral part of our operating strategy;
- Respect our stakeholders, the environment and cultural heritage;
- Constructively engage with affected communities and other stakeholders and address complaints about any breach of this policy promptly;
- Ensure that employees and contractors understand this Policy and conform to the high standards it requires; and

- Intervene promptly in unsafe or non-compliant situations.

In addition, AGL will actively seek to:

- Ensure its activities adhere to good international industry practices in environmental, social and human resource management, including the IFC's Performance Standards and EHS Guidelines; and
- Contribute to effective implementation of relevant principles and codes of practice related to environment, labour, corporate responsibility and access to information.

AGL will develop and maintain an ISO 14001-type environmental and social management system that provides the procedures and tools to implement this Policy.

The general manager of AGL has overall responsibility for all environmental and social issues associated with the company's activities. The operation of this policy and the associated procedures will be monitored and reviewed on a regular basis to ensure that they remain current and applicable to the Company's activities. This Policy has been endorsed by CEG's board and the management team who give their full support in its implementation. This policy is made available to the public and stakeholders through [www.cleanenergygroup.no](http://www.cleanenergygroup.no).

Signed.....

Date; July 2012

## **2.2.2 Planning**

### **2.2.2.1 Defining Project Impacts, Objectives and Management Plans/Procedures**

During the site preparation and construction phase there is the potential for environmental and social impacts to arise. Typical activities relevant to the construction phase will include amongst others environmental impacts associated with waste arising and disposal, fugitive dust, noise, effluent discharges potential chemical spills, ecological disturbance, erosion and traffic. In addition, suitable provisions are required to ensure good worker management relationships and conditions and to protect and enhance the quality of life for communities in the Project area.

The Project ESIA and ESMP identify the key environmental and social aspects and impacts associated with the construction phase of the Project, along with the required mitigation and monitoring measures to manage these impacts in line with national and international standards and requirements.

These ESIA and ESMP requirements, in addition to industry best practice measures, form the basis of the control measures and associated responsibilities defined within the CEMP and the associated sub-plans and procedures as summarised in Figure 2.1. Compliance of all Project construction activities with the requirements of the CEMP and the sub-plans is a key Project objective. AGL/OE is responsible for the monitoring and reporting of overall status of Project compliance with the CEMP and sub-plans throughout the construction phase through the adoption of key performance targets and indicators.

The Contractor(s) are responsible for developing and implementing their own management plans and / or procedures in line with the requirements the CEMP and sub-plans as part of their own EHS Management System. All Contractor environmental and social implementation plans / procedures for each stage of the project will be completed and submitted to AGL/OE as a minimum four weeks prior to commencement of

activities to allow sufficient time for AGL/OE review and approval of documents. Contractor method statements and work instructions will also form the basis to control site construction works.

In order to achieve the AGL policy of continual improvement, Project objectives and performance targets will be reviewed and established at least annually by AGL or as necessary upon any major change in Project activities or identification of any major non-compliance during the construction phase.

## **2.2.2.2 Legal and Other Requirements**

Identification of all legal and other requirements, which may impact Project construction phase activities, is a key step in the ESMS. The legal framework for the Project is outlined in Section 3 of this overarching CEMP. Any changes in the legal requirements will be monitored by AGL/OE and Contractor(s) will be informed about these changes. It is also the responsibility of the Contractor(s) to monitor any changes in legal requirements as they relate to activities under their control and to adapt their management controls as necessary to address these changes.

The OE Environmental Manager (please refer to Chapter 5 for description of AGL/OE organisational structure and the various roles and responsibilities) has primary responsibility for tracking and documenting any applicable changes to national and international standards, as well as the identification and monitoring of environmental permission requirements, issued by regulators. The OE Environmental Manager should distribute summaries of these requirements and the potential applicability for each pending or proposed regulatory change on Project activities. The AGL EHS Manager and OE Chief Engineer should review this information and direct feedback or questions to the Environmental Manager, as required.

AGL/OE will continually monitor environmental performance during the construction phase to verify compliance with legal and other requirements. This will be included as a key performance indicator for the Project.

## **2.2.2.3 Change Management**

To ensure that Project environmental and social impacts are identified and managed throughout the construction phase, environmental reviews shall be performed prior to the introduction of any new or modified process or activity that may have an impact on the environment or local communities. This review will be led by the OE Environmental Manager and / or Contractor(s) to identify if any new environmental and social aspects would arise by the proposed change and if any additional mitigation measures are required in order to meet national and international standards. This review will be triggered by changes such as:

- The purchase of new materials or equipment;
- Process changes;
- Equipment and engineering re-designs; and
- Modification or introduction of new construction procedures.

## **2.2.2.4 Review and Update of CEMP Plans and Procedures**

The OE Environmental Manager will ensure that the CEMP and sub-plans, procedures, and instructions are periodically reviewed to ensure that they remain current and effective. The AGL EHS Manager has the sole authority to issue new, or amend existing, management plans and procedures. Consequently, the OE Environmental Manager will liaise with the AGL EHS Manager to amend or introduce new environmental operating standards, as required.

CEMP policies, plans and procedures will be reviewed, at least annually, or prior to any major change in Project activities.

## **2.2.3 Implementation**

### **2.2.3.1 Structure and Responsibility**

A key element in the environmental and social management approach is the appropriate identification of the roles, responsibilities, authorities, and accountability of the Project personnel (including AGL/OE and Contractors). It is the responsibility of the AGL/OE to ensure effective implementation of the CEMP by:

- Provision of adequate resources;
- Documentation and communication of individual roles and responsibilities; and
- Establishing clear managerial accountabilities for environmental and social performance.

Section 4 of this CEMP outlines the organisational structure and accountability for the Project construction phase with respect to management of environmental and social issues. Thereafter Section 5 outlines the key roles and associated responsibilities for AGL/OE and its Contactor(s) to ensure effective environmental and social management throughout the construction phase.

### **2.2.3.2 Training, Awareness and Competency**

AGL/OE staff and any involved Contractor(s) staff will implement a training programme for the construction phase. The training programme will include environmental and social induction training for all Project personnel, additional specific training for individuals involved in particular tasks or with particular responsibilities, refresher training as necessary and ongoing toolbox talks throughout the construction phase. Contractor(s) will be responsible for ensuring that all their personnel are aware of their environmental and social responsibilities.

Further details of the training programme for the Project are defined in Section 6 of this CEMP.

### **2.2.3.3 Communications**

Internal interfaces within AGL such as those between AGL, OE and Contractors; and external interfaces, such as those between AGL and the authorities, suppliers and Contractors need to be properly managed to ensure effective operation of the ESMS. AGL will establish and maintain programmes and other formal mechanisms for internal and external communications regarding its environmental and social aspects, the ESMS and community initiatives.

The Stakeholder Engagement Plan will be applied to the implementation and control of all Project related communications with its stakeholders.

#### **Internal Interfaces**

The OE Environmental Manager will be responsible for the planning and implementation of internal communication concerning environmental issues across the Project. The AGL Community Liaison Officer will be responsible for the planning and implementation of internal communication concerning social issues.

Internal communications on environmental and social issues for the Project will be primarily aimed at achieving the following:



- Promoting environmental and social awareness;
- Reinforcing employees' environmental and social responsibilities;
- Informing employees and contractors about environmental and social risks and Project environmental and social standards and requirements;
- Communicating environmental and social performance;
- Sharing best practices and common problems/solutions; and
- Soliciting feedback on environmental and social issues.

The AGL Community Liaison Officer will work with the OE Environmental Manager to enhance the effectiveness of these methods of communication and to establish new methods, where necessary.

## External Communication

External communications during the construction phase are primarily designed to keep key external stakeholders apprised of Project environmental and social performance and current environmental or social initiatives. This will include:

- Educating the public on the environmental and social aspects of Project to recognise the main issues associated with construction activities;
- Informing local communities of any key upcoming construction activities;
- Reporting Project environmental performance as required by regulators and informing regulators of any occurrences of environmental non-compliance and the corrective actions implemented to prevent any recurrence; and
- Regular (quarterly) EHS progress reports to Lenders.

The Stakeholder Engagement Plan<sup>1</sup> defines the consultation approach and methods for the Project during the construction phase and includes a mechanism for receiving, documenting and responding to external inquiries and / or community grievances.

No environmentally related information will be sent to a regulator or lenders without prior consent of the AGL EHS Manager.

## Notice Boards

At the main entrance to each construction site, the Contractor(s) in agreement with AGL/OE will erect notice boards / signs. The notice boards will contain the following information:

- Names of AGL/OE and the Contractor(s),
- Contact phone numbers and names of contact personnel, ensuring a 24 hour response is available for external complaints / emergency contact;
- Copy of the AGL Health and Safety Policy and Environmental and Social Policy, and
- A slogan or phrase announcing to all entering and leaving or passing by the construction sites, of the Project commitment to the EHS of personnel, both on and off work sites.

EHS notice boards will also be erected in a prominent position at site offices and accommodation. The notice boards shall be used for the communication of health, safety and environmental awareness bulletins, and current health, safety and environmental issues/non conformances.

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<sup>1</sup> The Stakeholder Engagement Plan (SEP) has been prepared as part of the ESIA documentation for the project, copies of the SEP are kept centrally at AGL's head office in Batumi.

All EHS information will be made available in all relevant languages for the construction phase workers working at the sites.

## **Contractor Interface**

Communications between AGL/OE and the Contractor will be undertaken at both the head office in Batumi and at site level. It will be the responsibility of the Contractor Site Manager to interface with the Project management team located at the AGL head office in Batumi.

At the site level the key interface between AGL/OE and the Contractor will be between OE Environmental Manager and the Contractor Site Manager.

## **Complaints or Grievances**

The Stakeholder Engagement Plan includes procedures related to receiving, and responding to, complaints and other issues of concern from local communities within the Project area and from any other stakeholders. These mechanisms address:

- Dissemination of information regarding the Project;
- Procedures for receiving complaints during construction;
- Procedures for the rapid response to complaints during construction; and
- Coordination between AGL/OE and its Contractor with regards to complaint receipt and response.

Further details regarding the grievance / complaints procedure for the Project are detailed in Section 9 of this CEMP.

### **2.2.3.4 Emergencies and Contingency Plans**

The CEMP includes the following specific sub-plans which will be implemented by AGL/OE and its Contractor(s) throughout the construction phase to address possible emergency situations during the construction phase of the Project:

- Spill Prevention and Chemical Storage Plan; and
- Emergency Preparedness and Response Plan.

## **2.2.4 Checking and Corrective Action**

### **2.2.4.1 Monitoring and Measurement**

Monitoring is an integral part of the ESMS as it establishes how the Project is performing against the requirements of the CEMP and any associated objectives and targets. Both AGL/OE and its Contractor(s) will demonstrate how the requirements of the Project CEMP are being complied with. Key monitoring tasks will be undertaken by both AGL/OE and the Contractor to:

- Identify any negative impacts from the construction phase;
- Assess the effectiveness of control measures;
- Demonstrate compliance with the CEMP and objectives and targets;
- Identify if further controls / corrective actions are required; and
- Identify any areas for potential improvement in environmental or social performance.

A four tiered approach will be applied to the monitoring of the Project performance, as follows:

- **Site tours** – These will consist mainly of a daily ‘walkthrough’ the construction site by the Contractor(s) Environmental Officer and AGL EHS Officer(s);
- **Site Inspections** - To be conducted weekly by the contractor Environmental Officer and OE Environmental Manager (as well as EHS officers) to check construction site activities against a planned checklist;
- **Audits** – At least quarterly internal audits of the implementation of the CEMP and sub-plans will be conducted by the OE Environmental Manager. The Contractor being monitored will be represented by the contractor Environmental Officer or EHS Manager. In addition, independent external audits will be undertaken on a six monthly basis; and
- **Environmental Monitoring Programme** – Monitoring of key environmental conditions such as air quality, noise and water quality will be undertaken in accordance with the CEMP Construction Environmental Monitoring Plan.

Further details of the monitoring requirements are defined within Section 7 of this CEMP.

#### 2.2.4.2 Non-conformance and Corrective and Preventative Action

All areas of non-conformance identified through environmental inspections, reviews or audits will be documented and investigated. Non-conformances are considered to be; a deviation from the AGL Environmental and Social Policy or its underlying objectives and targets, a deviation from the requirements of the CEMP and sub-plans / procedures, and/or regulatory non-compliance.

Strict non compliance measures will be enforced in the event of a management failure and appropriate corrective actions put in place. The non-compliance procedure outlined in Section 8 of this CEMP will be applied for identifying and resolving non-compliant conditions and provides a mechanism to ensure that:

- The AGL EHS Manager is made aware of any area of the Project where serious or repeated non-conformances occur;
- All identified non-conformances are adequately followed up to ensure that applied corrective actions are effective;
- All followed up non-conformances are formally closed out, to signify that an appropriate level of corrective action has been applied to reasonably ensure that a repetition of the same problem will not occur; and
- Non-conformances are analysed at appropriate intervals to identify overall improvement opportunities.

#### 2.2.4.3 Communicating Performance

Results of environmental and social inspections and audits in addition to environmental performance indicators and accident / incident statistics will be reported to the AGL EHS Manager on a monthly basis throughout the construction phase in the form of a monthly EHS report. This report will be compiled by the OE Environmental Manager from weekly site inspections, monitoring results, and monthly EHS reports submitted by all Contractor(s) working throughout the construction phase. Reports will be and presented to the AGL EHS Manager for review by the OE Environmental Manager.

Externally, the AGL EHS Manager is responsible for reporting any Project environmental and social performance information to regulators and financing parties, whilst the Contractor(s) will be responsible for submitting any performance information to regulators for activities under their control.

Further details for the environmental and social reporting requirements for the Project are contained within Section 10 of this CEMP.

## 2.2.4.4 Records

Various records are required to be kept by AGL/OE and its Contractor(s) to demonstrate compliance with the CEMP. The CEMP sub-plans and procedures specify specific requirements for making and maintaining appropriate records. This is further discussed in Section 10 of this CEMP.

## 2.2.5 Management Review

AGL/OE EHS Team will analyse Project performance data and identify key improvement opportunities for the CEMP. Management review will take place on a monthly basis throughout the construction phase to evaluate ongoing environmental and social performance and also annually to evaluate the overall effectiveness of the CEMP.

Following submission of all relevant monthly EHS reports, the AGL HSE Manager will review the effectiveness of the CEMP. A review of control procedures may also be required following any reported non compliance.

In addition an annual management review will be conducted by AGL EHS Manager in line with ISO 14001 requirements to ensure the construction phase is meeting the appropriate environmental management standards. This review will include consideration of the followings:

- Results from audits;
- The extent to which policy and Project objectives and targets have been met;
- Project compliance with national regulatory requirements and other e.g. Lender requirements;
- The continuing suitability of the CEMP in relation to changing conditions and information;
- Any concerns raised amongst relevant interested parties; and
- The extent to which continuous improvement in the ESMS and environmental performance is met.

A need for changes to policy, performance objectives or measures, and/or other improvements to the CEMP / ESMS may arise as a result of this management review process and observations, conclusions and recommendations will be documented for necessary action.

## 3. Environmental Legislation, Regulations and Guidelines

### 3.1 Overview

AGL and its Contractor(s) and sub-contractor(s) are required to comply with applicable national and international legislation and standards at all times throughout the construction phase. The CEMP and sub-plans have been developed to incorporate such applicable legal and other requirements and to provide guidance of the necessary control measures and responsibilities needed in meeting such requirements.

Any changes in legal and international standard requirements will be monitored by the AGL EHS Manager who will inform the relevant departments and contractors about these changes. It is also the responsibility of the Contractor(s) (as well as AGL/OE within their scope of works) to monitor any changes in legal requirements as they relate to activities under their control and to adapt their management controls as necessary to address these changes.

### 3.2 National Legislation

All measures identified within this CEMP and associated sub-plans are in line with Georgian legislative requirements. Each individual sub-plan highlights the national requirements specific to the environmental or social discipline in question. In particular the sub-plans include, as applicable, the requirements of:

- National Laws;
- Decrees; and
- Regulations.

Each sub-plan will highlight any specific requirements which have been set out within the construction permit as well as any local requirements based on discussions with the Adjara Environmental Protection Agency. The OE Environmental Manager will maintain an up to date a register of all necessary external stakeholder reporting requirements under Georgian legislation and define responsibilities for such reporting. It is also the responsibility of the Contractor EHS Manager to maintain a similar register for activities under their control.

### 3.3 International Requirements

All measures identified within this CEMP and associated sub plans are in line with international guidance for construction and will be carried out in accordance with:

- International Finance Corporation (IFC): Policy and Performance Standards on Social and Environmental Sustainability;
- IFC General Environmental, Health and Safety (EHS) Guidelines, April 2007, as applicable; and
- Adopted International Conventions and Protocols.

Each individual sub-plan specifies the key international guidance specific to the various environmental and social disciplines.

## 4. Organisational Overview

### 4.1 Overview

For the construction phase, AGL/OE will take on the overall project management role and will be responsible for the management of all Contractor(s) and construction staff.

The Contractor(s) and their sub contractor(s) will be responsible for implementing their own management plans or procedures in line with the relevant national and international requirements and in line with the requirements of this plan.

AGL/OE will ensure that Contractor(s) follow all the procedures outlined within this plan and will oversee performance through regular site inspections and monitoring.

### 4.2 Construction EHS Organisation

#### 4.2.1 Overview

The key parties and their primary roles in EHS management for the Project are summarised as follows:

- AGL/OE - responsible for overseeing compliance with environmental policy and monitoring compliance of the Project, and ensure compliance with the obligations set out in the CEMP during the construction phase;
- Contractor(s) - responsible for implementing site specific CEMP via their own EHS management system to be approved by AGL; and
- Sub-contractor(s) – responsible for following and complying with the CEMP requirements set out by the Contractor and AGL.

#### 4.2.2 AGL EHS Organisation

AGL/OE EHS Team will oversee and manage all EHS issues during the construction phase of the Project, including monitoring of compliance with the obligations set out in the CEMP and the Contractors CEMPs. The EHS Team organisational structure is summarised within Table 4.1 below along with the key responsibilities for each role. More detailed responsibilities for these roles are defined in Section 5 of this CEMP.

Table 4.1: AGL/OE EHS Team Organisational Structure

Role	Responsibility	Location	Comment
AGL Project Manager / OE Chief Engineer	Overall responsibility for management of Project and Contractor, responsible ensuring sufficient resources available for implementation of CEMP.	Batumi Head Office and on Site.	
AGL HSE Manager	Policy, overall responsibility for compliance, communication with Lenders.	Batumi Head Office with regular visits to site	
OE Environmental Manager	Overall monitoring and reporting responsibilities, management of EHS system, auditing, communication with local authorities.	Batumi Head Office with regular visits to site	
AGL EHS	Monitoring of EHS for	On site	

Role	Responsibility	Location	Comment
Officer(s)	construction, day to day reporting.		
AGL Community Liaison Officer	Community liaison	Batumi Head Office with regular visits to site	
AGL Community Wildlife Officer	Monitoring wildlife and habitats for damage or disturbance. Involvement in implementation of biodiversity action plan.	On site	

For certain activities there will be a requirement to employ or contract staff on a temporary basis. This is expected to include archaeologists, ecological specialists and staff for training either workers or the community including on health care and financial management among others. These staff would be located at the construction offices for the duration of their work.

#### **4.2.3 Contractor EHS Organisation**

The Contractor Site Manager will have overall accountability for EHS performance across all activities under the Contractor’s control whilst the Contractors EHS Manager will be responsible for ensuring all EHS matters at site are managed in line with the CEMP. Contractor EHS staff will be located at the construction sites in order to provide day to day management of EHS and social issues.

## 5. Roles and Responsibilities

### 5.1 Overview

This section introduces the exact roles and responsibilities of key personnel employed by AGL/OE and the Contractor. Within each of the appended CEMP sub-plans specific responsibilities related to each of the environmental and social topics are assigned to the relevant roles. These include reporting lines in the event of a non compliance or an environmental incident. Below presents the details of the overarching responsibilities of each of the specific roles in implementing the CEMP.

It is the responsibility of AGL/OE to take ownership of the measures outlined within this CEMP and the accompanying sub-plans through the Environmental Manager role. AGL/OE will ensure that their Contractor(s) comply with the requirements set out within each of the identified roles through the site inspection and auditing process.

### 5.2 AGL/OE

#### 5.2.1 AGL Project Manager / OE Chief Engineer

- Responsible for overall management of Contractor(s);
- Overall responsibility to ensure sufficient resources are available for the implementation of the CEMP and the accompanying sub-plans across construction activities as described within the CEMP; and
- Overall responsibility to ensure appropriate corrective actions are implemented as a result of any identified non-compliances or environmental incidents related to any of the sub plans included within this CEMP.

#### 5.2.2 AGL EHS Manager

- Manage EHS Team and resources to enable implementation of the CEMP and sub-plans;
- Accountable to manage EHS issues across the Project and reporting Project EHS performance (for all environmental, social and safety aspects) to the AGL management and external bodies such as governmental bodies and Lenders;
- Assign appropriate resources to conduct investigations into any major EHS incident or non-conformance and ensure implementation of any arising corrective actions;
- Draft and agree the AGL Environmental and Social Policy with AGL management;
- Consult and liaise with EHS regulators and Lenders as necessary;
- Approve EHS reports to be provided to Lenders and authorities; and
- Determine appropriate corrective or management actions in response to any major EHS incidents or non-conformances occurring on the Project.

#### 5.2.3 OE Environmental Manager

- Ensure AGL team and OE staff receive appropriate level of environmental training to undertake their responsibilities;
- Monitor Project compliance with the requirements of the CEMP and sub-plans and report performance monthly to the AGL EHS Manager;
- Approve AGL environmental and social audit programme to monitor effectiveness of CEMP implementation by AGL and its Contractor(s);
- Undertake routine (at least every three months) audits of the implementation of CEMP across the Project construction sites, in line with the environmental and social audit programme;
- Approve any updates to the CEMP and its sub-plans and procedures;



- Liaise with Environmental Officers and the Contractor EHS Manager in defining appropriate corrective actions to be implemented as a result of any identified non-compliances or incidents related to any environmental, social and health and safety aspects and provide project-wide advice to ensure consistent approach and outcomes are achieved;
- Undertake annual review (and updates as necessary) of this CEMP and associated sub-plan and procedures;
- Track and document any applicable changes to national and international legislation and standards, and identify environmental permission requirements, issued by the regulator. Distribute summaries of these requirements and the potential applicability for each proposed regulatory change on Project activities;
- Consult and liaise with environmental regulators, NGOs and financing parties as necessary;
- Compile EHS reports to be provided to Lenders or regulators; and
- Provide advice to Project staff and Contractors as necessary in relation to Project environmental commitments and requirements as defined in the ESIA, ESMP or CEMP.

#### **5.2.4 AGL Environmental Officer(s)**

- Assess data from inspections, monitoring and reporting;
- Provide data for monthly EHS reports (for all environmental, social and health and safety aspects) and provide to the Environmental Manager;
- Arrange for any environmental monitoring that needs to be conducted during the construction phase as identified within any of the documentation included within the CEMP;
- Provide ad-hoc advice to Project staff and contractors in relation to environmental best practice measures and in relation to Project environmental commitments and requirements as defined in the ESIA, ESMP or CEMP;
- Assist the Environmental Manager in conducting site inspections and environmental training as necessary; and
- Ensure, on an on-going basis, that the requirements of the CEMP and sub-plans are communicated via formal training programmes to all personnel engaged in work on behalf of AGL.

#### **5.2.5 AGL Community Liaison Officer**

- Act as AGL primary point of contact for local communities should they have any complaints relating to the construction phase of the Project;
- Disclose all relevant information as specified within the ESIA, meeting with stakeholders and documenting all interactions;
- Organise meetings with stakeholders;
- Overseeing and facilitating community programmes;
- Monitor Project compliance with the social requirements of the CEMP and sub-plans and report performance monthly to the AGL HSE Manager via the OE Environmental Manager;
- Review AGL environmental and social audit programme to ensure it contains appropriate coverage of social issues;
- Assist Environmental Manager as necessary in defining appropriate corrective actions to be implemented as a result of any identified non-compliances or incidents related to any environmental, social and health and safety aspects;
- Provide social inputs to EHS reports to be provided to AGL management and Lenders; and
- Provide advice to Project staff and contractors as necessary in relation to Project environmental commitments and requirements as defined in the ESIA, ESMP or CEMP.

#### **5.2.6 AGL Community Wildlife Officer**

- Conduct daily and weekly EHS site inspections. Weekly inspections will be undertaken using weekly site checklists developed to ensure all control provisions are in place as specified within this CEMP;

- Report results of inspections and documentation reviews to the Contractor Site Manager and OE Environmental Manager;
- Conduct environmental training and toolbox talks in line with the requirements identified within this CEMP;
- Work with Contractor(s) to ensure all reasonable steps are taken to minimise environmental impacts from project construction activities.
- Conduct any environmental monitoring that is specified within any of the documentation supporting this CEMP;
- Monitor wildlife and habitats particularly relating to potential impacts from the construction phase of the project;
- To enforce a ban on all hunting and fishing in the Project area;
- Provide advice to all staff as necessary; and
- Undertake patrols across the Project area to ensure correct implantation of the sub-plans.

### **5.3 Contractor Staffing**

#### **5.3.1 Contractor Site Manager**

- Responsible for the day to day management of all Contractor construction components;
- Overall responsibility to ensure sufficient resources are available for the implementation of the CEMP and the accompanying sub-plans across all construction activities as described within the CEMP;
- Overall responsibility to ensure appropriate corrective actions are implemented as a result of any identified non-compliances or environmental incidents related to any of the sub-plans included within this CEMP;
- Overall responsibility for practical implementation by Contractor and sub-contractor staff of all requirements and commitments described in the CEMP and sub-plans;
- Overall responsibility for communications with AGL EHS Team with regard to environmental issues and non-compliances; and
- Ensure sufficient resources are available to implement all management measures on site as described in the CEMP and sub plans.

#### **5.3.2 Contractor EHS Manager**

- Ensure, on an on-going basis, that the requirements of the CEMP and sub-plans are communicated via formal training programmes and tool box talks to all site personnel;
- Ensure review of existing EHS plans/procedures and update them as necessary to incorporate any additional requirements contained within the CEMP and sub-plans;
- Provide assistance and advice to fulfil the requirements of the Contractor's CEMP and sub-plans;
- Liaising with the Environmental Officer to ensure appropriate corrective and preventative actions are defined as a result of any identified non-compliances or environmental incidents related to environment, social and health and safety aspects and ensure implemented at site;
- Monitor compliance with the requirements of the CEMP and sub-plans and report performance to the Contractor Site Manager;
- Ensure the Contractor Environmental Officer(s) are adequately qualified to understand and implement the CEMP;
- Reporting of all data and performance data as required;
- Liaising with the Contractor EHS Officer(s) to ensure effective environmental management at all site locations;
- Undertake and assess data from inspections, monitoring and reporting;
- Monthly reporting of EHS performance (including environmental, social and health and safety aspects) to the Contractor Site Manager and OE Environmental Manager;

- Ensure that all personnel under his/her management control are trained in all environmental procedures relevant to their work activities;
- Liaise with relevant organisations as necessary;
- First point of contact for the contractor to government bodies and other external bodies; and
- Review sub contractors procedures to ensure compliance with the CEMP and sub-plans.

### **5.3.3 Contractor Environmental Officer(s)**

- Nominated person to take primary responsibility for the day-to-day implementation of the CEMP and sub-plans;
- Conduct toolbox talks;
- Provide assistance and advice to site workers and engineers to fulfil the requirements of the CEMP and sub plans;
- Conduct daily/weekly EHS site inspections, in line with the requirements specified in Section 7 of this CEMP;
- Report results of inspections and documentation reviews to the Contractor EHS Manager;
- Fill out the site environmental action register if required;
- Ensure that appropriate emissions management measures are implemented and maintained on site in line with the CEMP and sub-plans for operations under their control;
- In the event of identified potential or incidents, report via incident form and implement appropriate corrective or preventative actions as necessary; and
- Following procedures and actions listed in the CEMP when undertaking site work.

## **5.4 Sub Contractors**

It is the overall responsibility of the Contractor Site Manager to ensure that the all sub contractor(s) implement requirements of the CEMP and sub-plans.

## 6. Training

### 6.1 Overview

In achieving the approach to environmental management described in previous sections, it is implicit that all construction personnel receive the required training. Contractor(s) will be responsible for ensuring that all contractor personnel are aware of their environmental and social responsibilities. Training will not be undertaken as a one off but instead will be continually refreshed as part of on-going site training programmes focussed on the training needs of construction personnel. Training will be provided for training of all new recruits and continual refresher courses will be established for staff to attend on a yearly basis.

Environmental training programmes will ensure that all site personnel, as applicable to their job responsibilities fully understand:

- The environmental requirements of the Project and how they will be implemented and monitored on site;
- The potential impacts of the Project, the mitigation measures that have been adopted to address those impacts and how and where to apply these measures;
- Any environmentally or socially sensitive areas in the vicinity of the construction site;
- The procedures for responding to the media, to unauthorised visitors to the site and enquiries from the public;
- Any defined seasonal ecological sensitivities and restrictions (timing or methods) for construction activities;
- Know how to deal with unforeseen environmental incidents; and
- Are aware of the roles of the contractor staff and the AGL/OE with respect to environmental issues.

### 6.2 Site Induction Training

As part of the ESMS all construction staff members (both AGL/OE and Contractor(s)) will attend an in-house site induction training course. This should be delivered in a consistent structure, irrespective of the staff designations attending. The main objective of this type of training is to provide:

- A general understanding of the environmental risks associated with the construction activities proposed;
- Local, national and international requirements; and
- Clarification of the AGL Environmental and Social Policy and its practical implementation, stressing that it carries implications for the working methods and responsibilities for all employees.

Continual awareness of environmental matters should be maintained. The Environmental and Social Policy Statement should be on permanent display in prominent positions around the construction site, such as the administration block, reception area, the control room and the staff canteen.

The site induction training will be carried out by all staff before they commence work on site. As a minimum the training will include but not be limited to:

- The purpose and objectives of the CEMP;
- The reason why the requirements set out in this CEMP are important;
- The requirements for due diligence and duty of care;
- AGL and Contractor's environmental personnel and other key contacts;
- Methods for implementing environmental controls included within the CEMP and sub-plans;
- Procedure for reporting environmental incidents;
- Procedures for responding to the media, to unauthorised visitors to the site, and enquiries from the public; and

- Details of site emergency and response plans.

In addition to the site induction training personnel will not be allowed to perform hazardous operations before they have completed appropriate additional training in this regard.

### **6.3 Specialist Environmental Training**

In addition to the site induction training additional specific environmental and social training will be provided focused on small, discrete groups of employees who carry out the same, or similar, roles such as the Contractor(s) supervisors.

Specialist environmental and social training will also be provided for construction workers as applicable to their job responsibilities. Selected workers will be responsible for emergency responses to spills (such as the tier 2 spill response team described in the Spill Prevention and Chemical Storage Plan) and will also receive the appropriate training.

AGL/OE and its Contractor(s) will maintain a training needs matrix and associated training programme to identify which specific job roles for their respective organisations require such additional specialist training.

Specialist training will either be performed by suitable qualified in-house personnel or by approved specialist external training providers.

### **6.4 Toolbox Talks**

It is the responsibility of the Contractor Environmental Officer(s) to implement a programme of toolbox talks for all construction personnel during the construction phase. This will be assisted by AGL EHS Officer(s) if necessary. At least fortnightly toolbox talks will be performed for all workers on-site; these will be done in groups with talks made relevant to their construction roles on site. Either AGL/OE or the Contractor's senior management may call additional toolbox talks should the need arise to further discuss safety or environmental and social aspects.

The topics of the talks will cover all environmental, social and safety issues; they will be focused on issue relevant to forthcoming construction works or related to any non compliance that have recently occurred. Topics to be covered should include but not be limited to:

- Minimising vegetation clearance;
- Fishing and hunting ban;
- Water quality and erosion control;
- Noisy works or works outside of normal operating hours;
- Environmental procedures covered within the CEMP sub-plans';
- Non compliance procedures; and
- Any changes to this CEMP.

When performing the talks the Contractor Environmental Officer will ensure that they are kept interesting, less than fifteen minutes and relevant to the current on site construction activities.

### **6.5 Training Records**

Records of all training provided and the associated attendees should be maintained in line with the requirements of an ISO 14001 EMS.

Staff will complete and sign an attendance sheet for all courses attended, including the toolbox talks training. Staff will also be asked to complete a course evaluation sheet at the end of each course in order to assess the effectiveness of the training delivered.

All records, including the course evaluation sheets and attendance sheets, will be held in a central location by the Contractor EHS Manager and made available during any audit conducted as part of the audit programme.

# 7. Environmental Inspection, Monitoring and Auditing

## 7.1 Overview

Effective reporting is essential for ensuring the ESMS is of practical value. Routine independent auditing provides the necessary impetus for continual improvement. Environmental inspection, monitoring, reporting and auditing should be carried out to ensure compliance with national and international requirements as set out in the CEMP and sub-plans.

A four tiered approach will be applied to the monitoring of the Project performance, as follows:

- Site Tours;
- Weekly Site Inspection;
- Audits; and
- Environmental Monitoring Programme.

## 7.2 Site Tours

It is the responsibility of the Contractor Environmental Officer(s) and AGL Environmental Officer(s) to carry out daily site walkovers. The daily walkover will focus on environmentally sensitive areas and receptors and compliance with the CEMP.

Although there is no specific site checklists or forms to fill in, a record of the walkover will be kept in the site diary and if required photographs will be taken as a record. In addition an environmental register will be completed to record any minor non compliance and associated actions which construction personnel are required to undertake. Further details of the environmental register are provided in section 8.

In the event of a potentially serious incident being identified the Contractor Environmental Officer or AGL Environmental Officer(s) will inform the OE Environmental Manager who will instruct the contractor to cease work and follow the non compliance procedure identified in section 8 of the CEMP.

## 7.3 Weekly Site Inspections

It is the responsibility of the Contractor Environmental Officer(s) and OE Environmental Manager (together with AGL Environmental Officer(s)) to carryout weekly site inspections. These will be carried out using the weekly site inspection checklists provided for each of the sub plans.

The checklists will be used as the primary tool for identifying any non compliance. In the event of a non compliance the non compliance procedure identified in Section 8 of the CEMP will be followed and implemented. As with the daily site walkover any minor items identified which require immediate action will be recorded in the environment register.

A hard copy of the checklists will be printed out and completed by the Contractor Environmental Officer and OE Environmental Manager during the inspection of the site. The completed checklists will be stored in a central location and transferred to the onsite computer system for record. The inspections will be used to ensure the Contractor(s) is fully implementing the management procedures outlined within each of the sub-plans.

The information collected from the weekly site inspections will be made available to the Contractor Site Manager. Relevant findings, along with details of any corrective actions undertaken will be included within the monthly EHS report to be completed by the Contractor EHS Manager and submitted to Contractor Site Manager and the AGL EHS Manager.

## **7.4 Audits**

### **7.4.1 Internal**

Internal auditing will be undertaken by the OE Environmental Manager at least quarterly. The contractor being monitored will be represented by the Contractor Environmental Officer or EHS Manager. The internal audits will include the following:

- Check Contractor(s) compliance with the control procedures within selected CEMP sub plans;
- Review the CEMP and sub plans to ensure that they are relevant to current construction activities and recommend changes if required;
- Review the results of monitoring against the relevant criteria set out in each of the sub-plans;
- Review all non compliances (if any) to determine if additional controls are required; and
- Review environmental action register to ensure all issues are dealt with in a timely manner.

The results of internal audits will be provided to the AGL HSE Manager and the Contractor Site Manager for action as necessary. Following an internal audit it may be required to update the CEMP.

### **7.4.2 External**

#### **7.4.2.1 Independent Audits**

In order to satisfy lending requirements, throughout the construction phase, the Lenders are likely to require independent external monitoring by an industrial environmental management specialist every six months. The independent audit will review the existing practices against the requirements of the CEMP and accompanying sub-plans. The key objectives of the audit should be as follows:

- Report on the practical implementation of the CEMP and progress since the last visit (if applicable); and
- Establish feasible improvement objectives for completion before the next visit.

These audits should be used to re-examine the continued appropriateness of the CEMP and to provide advice on any updates required. Attention should be given to lessons learnt in the light of experience. In particular, consideration should be given to the monitoring programmes in place to determine whether their purpose has been served and they can therefore be terminated or reduced in frequency.

#### **7.4.2.2 Lender Field Visits**

Representatives of Lenders will be involved in regular field visits to monitor Project progress in implementing environmental and social measures. Prior notice will be provided by the Lenders before such field visits. The AGL EHS Manager with assistance of the OE Environmental Manager will co-ordinate such field visits.



## **7.5 Environmental Monitoring Programme**

During the construction phase additional environmental monitoring will be undertaken as specified within the construction environmental monitoring sub-plan. Monitoring will be undertaken in addition to the daily and weekly site inspections for;

- Dust;
- Water effluent discharges;
- River water quality; and
- Noise.

Results from the monitoring will be compared to relevant national and international requirements to ensure compliance of the Project.

## 8. Non Compliance and Corrective Actions

### 8.1 Overview

This section provides the appropriate actions in the event of a reported environmental or social non-compliance during the construction phase of the project. A non compliance can be reported via the daily site walkover, the weekly site inspection or by construction personnel upon discovery. In addition to non compliances which result in construction works being suspended there are likely to be small environmental and social issues which need to be addressed on a daily basis. These are addressed as minor non compliances via the use of the environmental register.

A minor non compliance is defined as:

- A non compliance that can be resolved within a short timescale; and
- Would not result in either environmental harm or an emergency situation.

A non compliance that requires the non compliance procedure to be followed is defined as:

- Deviation from the AGL environmental and social policy or its underlying objectives and targets;
- Deviation from the requirements of the CEMP and sub-plans/procedures; and
- A regulatory non compliance which could result in environmental harm and/or an emergency situation as a result of construction activities.

### 8.2 Minor Non Compliances

In the event that during the daily site walkover or weekly site inspection a minor non compliance is identified, such as inappropriate segregation of waste streams, the Contractor Environmental Officer(s) and AGL Environmental Officer(s) will notify the OE Environmental Manager and Contractor EHS Manager and record in the site diary and the environmental register. The purpose of the environmental register is to keep a log of all minor non compliances and enable the Contractor Environmental Officer(s) and AGL Environmental Officer(s) to check that issues have been resolved the following day and therefore can be closed out on the environmental register.

### 8.3 Non Compliance Procedure

In the event that a non compliance is identified in either the daily site walkover or the weekly site inspection or as a result of a complaint, all construction work connected to the non compliance will be suspended. The Contractor EHS Manager will conduct an investigation into the issue and if the non compliance is confirmed to be as a result of the construction activities and could cause environmental harm and/or an emergency, work may not recommence until the relevant control measures are implemented appropriately or adapted.

Further specific details of the investigations are provided within each of the environmental and social sub-plans. However, if deficiencies are identified and non-compliances with the environmental requirements and objectives of this plan are observed, an Incident Report will be completed as described below.

### 8.4 Incident Report

Any breaches of the management procedures identified in any of the sub-plans as included within the appendices should be reported to the AGL EHS Manager, using an incident report form provided in Appendix A.

As part of the incident report form any additional relevant actions/mitigations that are identified as being required will be identified and agreed with the Contractor Site Manager and the OE Environmental Manager. Once they have been agreed and recorded in the incident report form it will be the responsibility of the OE Environmental Manager to update the relevant control procedures within the appropriate sub-plans.

A copy of each completed incident report form will be held on file by the AGL EHS Officer and included in the monthly reporting.

## 9. Complaints Handling Procedure

### 9.1 Overview

This section provides details on the required procedure in the event of a complaint.

### 9.2 Complaints procedure

A tabulated standard form is presented in Appendix B for recording any environmental or social complaints that are received from the public or government organisations by whatever medium i.e. visits to the site, telephone calls or correspondence.

The form concisely lists the following information:

- Date of the complaint;
- Name and contact address of the complainant;
- Brief description of the complaint, with a file reference to any correspondence from the complainant;
- Brief description of the action taken by the AGL Community Liaison Officer to investigate the cause of the complaint and bring about corrective action, if justified; and
- Date of reply to the complainant, with a file reference to any correspondence.

The AGL Community Liaison Officer will act as a point of contact for receiving written comments and grievances about the Project.

During registration of oral and written references, names and personal details of respondents or complainants will be kept confidential. For reporting purposes, information will be general, such as "the local resident; a female of 45 years of age" or "the inhabitant of (the name of region)" will be used instead of names and addresses.

An acknowledgement of the receipt of the comments or complaints will be sent out within ten working days of receipt. In the event of complaints, the complainant will be kept informed of the status of their complaint until the complaint is resolved or no further action is possible. Results of the analysis of the complaints will be summarized in monthly reports supplied to AGL EHS Manager to make decisions about the necessity of taking remedial measures. Urgent issues needing immediate attention will be provided to AGL EHS Manager without delay.

# 10. Environmental Reporting Records

## 10.1 Overview

This section details on the requirement for environmental reporting and records keeping.

## 10.2 Regulatory Reporting

The OE Environmental Manager will maintain an up to date register of all necessary external stakeholder reporting requirements under Georgian Legislation and define responsibilities for such reporting. It is also the responsibility of the Contractor EHS Manager to maintain a similar register for activities under their control.

## 10.3 Monthly EHS Reports

The Contractor EHS Manager should prepare monthly reports for issue to Contractor Site Manager and the OE Environmental Manager. These reports will normally be no more than two to five pages in length, to summarise the following:

- Progress in implementing this CEMP;
- Findings of the monitoring programmes, with emphasis on any breaches of the control standards, action levels or standards of general site management;
- Outstanding Incident report forms;
- Summary of any complaints by external bodies and actions taken/to be taken; and
- Relevant changes or possible changes in legislation, regulations and international practices.

The monthly EHS reports will be reviewed by the AGL/OE management to ensure that the CEMP is being properly implemented. During the review process the reports will also be used to determine if updates to the CEMP are required.

## 10.4 Quarterly Reports to Lenders

The AGL EHS Manager will provide a quarterly report to the lenders which will consist of the following:

- Number of non compliances incidences (if any);
- Number of complaints in relation to any environmental or social grievances (if any);
- Details of any corrective actions (if any) ;
- Results of environmental monitoring; and
- Overall EHS performance.

## 10.5 Record Keeping

As a minimum the OE Environmental Manager will ensure that there is a central records store at the Project site and the AGL head office in Batumi. In addition electronic copies will also be filed in a suitable location on the AGL's computer system. As a minimum the following records should be kept in all three locations:

- Detailed training records of all personnel;
- Copies of the site diary and environmental register;
- Weekly site inspection reports;
- Monthly EHS reports;
- Reports from three monthly audits;

- Quarterly reports issued to lenders and other stakeholders;
- Environmental monitoring reports and results; and
- Operational records specified within the CEMP sub-plans such as waste registers and transfer notes.

All Contactor(s) are responsible for maintaining all environmental management records for operations under their control at site.

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# Appendix A. Incident Reporting Form

## Incident Reporting Form

Assessment of the Incident:

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Date:

---

Time

---

Name of Personnel Reporting the Incident:

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Name of Person filling out the Form:

---

Nature of the Incident:

---

Scale of the Incident:

---

Location of Incident:

---

Potential Impact Sites:

---

Cause of Incident:

---

Response to incident:

---



# Appendix B. Complaints form

## Complaint Form

Date: \_\_\_\_\_

Name: \_\_\_\_\_

Address (if applicable): \_\_\_\_\_

Brief description of the complaint, with a file reference to any correspondence from the complainant: \_\_\_\_\_

Brief description of the action taken by the AGL Community Liaison Officer to investigate the cause of the complaint and bring about corrective action, if justified: \_\_\_\_\_

Date of reply to the complainant, with a file reference to any correspondence: \_\_\_\_\_

Has issue been fully resolved with a satisfactory outcome? \_\_\_\_\_

Signed AGL Community Liaison Officer: \_\_\_\_\_

Signed OE Environmental Manager: \_\_\_\_\_