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ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT (ESIA) GANJA WASTEWATER PROJECT, AZERBAIJAN

ENVIRONMENTAL AND SOCIAL ACTION PLAN

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ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT (ESIA) GANJA WASTEWATER PROJECT, AZERBAIJAN

ENVIRONMENTAL AND SOCIAL ACTION PLAN

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2	25 November 2025	Draft version addressing EBRD's comment and issued for review by the Client and EBRD
3	12 December 2025	Final version for disclosure
4	1 May 2026	Revised to incorporate issues raised during public consultation.

LIST OF ABBREVIATIONS:

ASWRA or "the Company"	Azerbaijan State Water Resources Agency
E&S	environmental and social
EBRD	European Bank for Reconstruction and Development
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	E&S Management System
EU	European Union
GAP	Gender Action Plan
GBVH	Gender-based violence and harassment
GHG	Greenhouse gases
GIP	good international practice
IFC	International Finance Corporation
O&M	Operations and Maintenance
OHS	Occupational Health and Safety
PIS	Project Implementation Support
PIU	Project Implementation Unit
PMU	Project Management Unit
RF	Resettlement Framework
RP	Resettlement Plan
SEP	Stakeholder Engagement Plan
SPZ	Sanitary protection zone
WWTP	Wastewater Treatment Plant

Table 1. Environmental and Social Action Plan

No.	Action	Environmental & Social (E&S) Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR ¹ , Best Practice)	Resources, Investment, Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
PR1	Assessment and Management of Environmental and Social (E&S) Risks and Impacts					
1a	Assess if any substantial design changes are required due to the ESIA/ESMP and update the detailed design documentation (as required also by local legislation);	Identifying and prioritizing the project's E&S impacts is a key step towards planning effective management measures addressing the impacts.	EBRD PR1 National regulations	Internal resources, External consultants. Responsibility: PMU in cooperation with ASWRA, supported by external project implementation support (PIS) consultants.	To be completed for EBRD's evaluation prior to the start of construction	ESMP/ESIA mitigation included in the detailed design
1b	As a part of the detailed engineering design complete local EIA (OVOS) and obtain State Environmental Review (SER) approval.					Completed EIA process as per national requirements.
1c	Based on the detailed design, and local EIA (OVOS), prepare an amendment to the ESIA and communicate the amendment to affected communities, including consultation. Include reassessment of odour impact based on final design and modify design if needed,					Amendment to the ESIA disclosed and consultations conducted
1d	Obtain the necessary authority approvals for the WWTP construction and operations.	Availability of necessary approvals and permits for construction and operation of project components for legal compliance.	EBRD PR1 National regulations	Internal resources, External consultants. Responsibility: PMU in cooperation with ASWRA supported by PIS consultants as applicable.	To be completed for EBRD's evaluation prior to the start of construction	Necessary environmental approvals are in place for construction . Necessary environmental approvals in place for operations .
1e	Develop and implement an Environmental and Social Management System (ESMS)	The ESMS is the overall platform for	EBRD PR1	Internal resources, External consultants.	To be completed for EBRD's	Description of the Project's ESMS

¹ Source: EBRD Environmental and Social Policy (2019). Available online at <https://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html>. Note that a Russian version of this document is also available at: <https://www.ebrd.com/environmental-and-social-policy-russian.pdf>

	for the Project, considering the E&S impacts identified in the ESIA for the Project lifecycle.	the client and the contractor to manage project E&S appropriately.		Responsibility: PMU in cooperation with ASWRA, supported by PIS or other consultants as applicable.	evaluation prior to construction and operation start as applicable	including roles and responsibilities for E&S management during project construction and operations. E&S Policy and functional control and monitoring procedures in place. Training conducted
1f	Update the existing Corporate E&S policy to include ASWRA's commitment to aligning with international approaches and IFI requirements. <i>Or, as an alternative, develop a Project-specific E&S Policy (including the commitment to complying with EBRD requirements and relevant provisions) as a stand-alone document.</i>	The Corporate E&S Policy provides client commitment to managing project E&S impacts identified in the E&S Assessment compliant with EBRD requirements	EBRD PR1	Internal resources, PMU in cooperation with ASWRA, supported by PIS consultant.	To be completed for EBRD's evaluation prior to construction start	Updated Corporate E&S Policy (or Project-specific E&S Policy) in place for the project
1g	Implement the WWTP Project ESMP covering the design, construction, and operations stages of the Project as quickly as possible to address uncontrolled discharge of wastewater	Implementation of E&S prevention and mitigation measures	EBRD PR1 National regulations	Internal resources, PMU in cooperation with ASWRA, supported by PIS consultants as applicable.	To be completed for EBRD's evaluation prior to the start of construction and operation as applicable	ESMP for project adopted, implemented and progress tracked
1h	<ul style="list-style-type: none"> Establish an organisational structure with defined roles, responsibilities, and authority to implement the Project ESMS. Seek support from the Project Implementation Support (PIS) Consultant to build the necessary capacity at ASWRA headquarters and in Ganja to support implementation of the ESMP during Project construction and operations. 	Optimisation of the management of the project environmental, social, and health & safety aspects	EBRD PR1, paragraph 24	Internal resources, PMU in cooperation with ASWRA, supported by PIS consultant.	To be completed for EBRD's evaluation prior to the start of construction and operation as applicable	Description of organization and roles for ESMS implementation, e.g., as part of the ESMP for the Project.
1i	Develop a Contractor Management Procedure to ensure, in coordination with	Optimisation of the management of	EBRD PR1	Internal resources, PMU in cooperation	To be completed in due time for	Contractor Management

	<p>relevant authorities as needed, that any contractor working on Project sites will meet Project E&S requirements. This entails:</p> <ul style="list-style-type: none"> • Incorporating relevant ESMP conditions in tender documents, contractually requiring contractors to apply these standards and corrective action where there is non-compliance. • Ensuring that contractors have the knowledge and skills to perform their project tasks in accordance with contract conditions; and, in the case of subcontracting, requiring that contractors have similar arrangements with their subcontractors. • Requiring Construction contractors to develop and implement a Contractor's ESMP based on the overall ESMP for the Project. • Ensuring that the PMU has sufficient staff to monitor and manage E&S aspects of contractors during project implementation. • Requiring contractors / suppliers to develop operations and maintenance manuals for newly installed equipment in conjunction with the Project and train the responsible staff in applying the manuals. This shall include proper maintenance schedules, health and safety aspects as well as emergency measures and documentation. 	<p>the environmental, social, and health & safety aspects at the project sites during operation</p>	<p>National regulations</p>	<p>with ASWRA, supported by PIS consultants as applicable.</p> <p>PMU to assign sufficient staff to monitor and manage E&S aspects of contractors during the project.</p>	<p>EBRD's evaluation prior to the start of construction and operation as applicable</p>	<p>Procedure adopted and implemented, with the needed resources in place.</p> <p>O&M manuals prepared together with a training schedule.</p>
<p>1j</p>	<p>Provide annual E&S Reports to EBRD on the ESAP progress and the Project's E&S performance until the loan is repaid.</p>	<p>Timely monitoring and reporting on the Project's E&S commitments</p>	<p>EBRD PR1</p>	<p>Internal resources, External consultants Responsibility: PMU in cooperation with ASWRA supported by PIS consultants as applicable.</p>	<p>Annually after receiving the loan</p>	<p>Annual reports of due quality submitted to the EBRD</p>

PR2 Labour and Working Conditions						
2a	Conduct a gender analysis and needs assessment and based on the findings develop a gender action plan (GAP) and policies for implementation. The GAP could, for example include requirements for gender diversity during recruitment processes, training on gender equality and women's employment etc.	Encourage a more gender-balanced staff composition and an increased awareness of gender equality aspects.	EBRD PR2, EBRD Guidance Note PR 2: Labour and Working Conditions	Internal resources, External consultants Responsibility: ASWRA, supported by PIS or GAP consultants as applicable.	Within 12 months of commencing Project activities	GAP developed, adopted, and implemented
2b	Appoint and support gender focal points at ASWRA headquarters and ASWRA in Ganja with sufficient mandate and resources.					Gender focal points appointed and working at ASWRA headquarters and at ASWRA in Ganja, with support from the ASWRA management.
2c	Prepare and implement a policy on gender-based violence and harassment (GBVH), inform employees (including in Ganja) about the policy and encourage them to report concerns and incidents of GBVH through the staff grievance mechanism.	Ensure that incidents and concerns about GBVH are taken seriously and addressed by appropriate action.	EBRD PR2, EBRD Guidance Note PR 2: Labour and Working Conditions	Internal resources, External consultants Responsibility: ASWRA, supported by PIS or GAP consultants as applicable.	Within 6 months of commencing Project activities	Policy on GBVH prepared and disseminated, aiming at the prevention of any GBVH.
2d	Establish and implement an employee grievance mechanism at ASWRA in Ganja. This should include registration of grievances but still allow for grievances to be treated confidentially, where preferred by employees. A clear description of the employee grievance mechanism should be prepared, including the role of the trade union committee, and dissemination of this information to all employees.	Ensure that employees can raise their concerns and complaints and that these are handled in a systematic and transparent manner.	EBRD PR2, EBRD Guidance Note PR 2: Labour and Working Conditions National Labour Law	Internal resources, External consultants Responsibility: ASWRA, supported by PMU and PIS consultants as applicable.	Within 6 months of commencing Project activities	Employee grievance mechanism in place in ASWRA in Ganja and information disseminated to all ASWRA staff in Ganja.
2e	Monitor that contractors and consultants hired for the Project comply with Azerbaijani legislation and EBRD PR 2 requirements inclusive of access to a grievance mechanism, working conditions, wages, working time.	Ensure proper employment and working conditions for staff employed by contractors and consultants involved in the	EBRD PR2, EBRD Guidance Note PR 2 National Labour Law	Internal resources, External consultants Responsibility: PMU in cooperation with ASWRA, supported by PIS consultants as applicable.	During construction	Monitoring reports are available

		Project.				
2f	Contractors and consultants hired for the Project are to have in place or develop gender-based violence and harassment policies, codes of conduct and confidential grievance mechanisms.	Ensure that GBVH incidents and concerns are taken seriously and addressed appropriately.		Internal resources, External consultants Responsibility: PMU in cooperation with ASWRA, supported by PIS or GAP consultants as applicable.	Before the start of construction	Procedures and documents established by contractors and consultants.
2g	Contractors to develop and implement a Worker's Accommodation Management Plan in compliance with IFC/EBRD Guidance on Workers' accommodation processes and standards (2009) and national requirements.	Prevent poor accommodation facilities and management, with harmful impact on workers and/or local communities.	EBRD PR2 IFC/EBRD Guidance on Workers' accommodation processes and standards (2009) National requirements	Internal resources, External consultants Responsibility: PMU in cooperation with ASWRA, supported by PIS consultants as applicable.	Before the start of construction	Worker's Accommodation Management Plan developed, approved, and followed by contractors.
2h	<ul style="list-style-type: none"> Employees (including managers) at ASWRA in Ganja are to be offered training based on their job descriptions. Staff responsible for the E&S management should be trained in E&S monitoring and reporting ensuring capacity for the ESAP implementation. Broader training on EBRD requirements is to be provided to top management and EHS staff at headquarters. 	Ensure capacity, including to implement the ESAP.	EBRD PR2 EBRD Guidance Note PR 2	Internal resources, External consultants Responsibility: PMU in cooperation with ASWRA, supported by PIS and GAP consultants as applicable.	Starting within 12 months of commencing the Project activities	Documented evidence of conducted trainings.
PR3 Resource Efficiency and Pollution Prevention and Control						
3a	Develop and implement an Energy Efficiency Plan, which will detail long-term energy efficiency targets for the WWTP aligned with Good International Practice (GIP) and energy efficiency improvements needed to meet the targets.	Optimisation of project's environmental performance and resources use.	EBRD PR3	Internal resources, External consultants Responsibility: PMU in cooperation with ASWRA, supported by PIS consultants as applicable, Construction Contractor during construction.	To be completed for EBRD's evaluation prior to the start of operation as applicable, then on an ongoing basis	Energy Efficiency Plan developed, adopted, and implemented during operations
3b	In dialogue with relevant stakeholders, identify opportunities to further increase water use efficiency. This may include: efforts to encourage water savings,					Water use efficiency actions developed and implemented

	through constructive dialogue, awareness raising and water education initiatives amongst its customers, including both households and commercial users.					
3c	Develop a Waste Management Plan for i. construction and ii. operations <i>(refer to the ESMP for details of what to consider in the plans)</i>	GIP waste management	EBRD PR3 National regulations	Internal resources, External consultants Responsibility: PMU in cooperation with ASWRA, supported by PIS consultants as applicable, Construction Contractor during construction. ASWRA during operations	To be completed for EBRD's evaluation prior to i) construction and ii) operation as applicable, then implement	Waste Management Plan for construction developed and implemented; Waste Management Plan for operations developed and implemented.
3d	Within the WMP for operations formulate and implement a medium to long-term sludge disposal plan that ultimately uses sludge for agriculture for final disposal. Should sludge require disposal at the landfill, this should be viewed as only an intermediate option, while contaminant sources are obliged to improve their effluent discharge quality.	GIP waste management	EBRD PR3 National regulations	Internal resources, External consultants Responsibility: PMU in cooperation with ASWRA, supported by PIS consultants as applicable, ASWRA to implement during operations	Must be completed ahead of the 2-year operations window for which the current site can be used for sludge storage.	Sludge disposal aligned with GIP
3e	Ensure that facilities for sludge disposal in the first 2 years operations are equipped to manage leachate from the sludge and to prevent it being discharged off-site.	GIP waste management	EBRD PR3 National regulations	Internal resources, External consultants Responsibility: PMU in cooperation with ASWRA, supported by PIS consultants as applicable, ASWRA to implement during operations	To be included in the detailed design and implemented in time for receipt of first sludge.	Facilities in place and no evidence of leachate in offsite surface or groundwater.
3f	Ensure the timely completion of the connection of the old sewer in the city to the main wastewater connector.	Pollution prevention	EBRD PR3 National regulations	External consultants Responsibility: PMU in cooperation with ASWRA, supported by PIS consultants as applicable, ASWRA to	To be completed prior to operations of the WWTP.	Facilities in place and material improvement in water quality in the Goshkar River.

				implement during operations		
3g	Decide on use of treated effluent and whether it can be made available for irrigation, in consultation with stakeholders.	Optimisation of resource use	EBRD PR 3	ASWRA	Prior to completion of final design	Decision and evidence in final design
PR4 Health, Safety and Security						
4a	Develop and implement i) A Construction Occupational Health and Safety Management Plan and later ii) An Operations Occupational Health and Safety Management Plan <i>NB: Details about the content of the plans are provided in the ESMP</i>	Minimisation of the OHS and community health and safety risks of the Project during construction	EBRD PR4, EBRD Guidance Note PR 4: Health, Safety and Security ² EBRD BN02; EBRD Guidance Note on 'Safe Working in Confined Spaces' ³ EBRD Briefing Note 03 on 'Working Safety Around Asbestos Pipes (2021) ⁴	Internal resources, external consultants Responsibility: PMU in cooperation with ASWRA, supported by PIS consultants as applicable.	To be completed in due time for EBRD's evaluation prior to the start of construction and operation as applicable, then on an ongoing basis	Construction Occupational Health and Safety Management Plan developed and implemented. Operations Occupational Health and Safety Management Plan developed and implemented.
4b	<ul style="list-style-type: none"> Develop and implement a Community Health and Safety Plan that identifies the relevant measures to manage community health and safety aspects during i) construction and ii) operations of the Project. During operations, ensure that untreated wastewater is not available to residents (not sold and used). Establish surveillance and other security measures during operations. 	Minimisation of Project OHS and community health and safety risks of during construction	EBRD PR4, EBRD Guidance Note PR 4 National regulations	Internal resources, External consultants Responsibility: PMU in cooperation with ASWRA, supported by PIS consultants as applicable.	To be completed for EBRD's evaluation prior to the start of construction and operation as applicable, then on an ongoing basis	Construction Community Health and Safety Management Plan developed and implemented. Operations Community Health and Safety Management Plan developed and implemented.

² <https://www.ebrd.com/documents/environment/guidance-note-performance-requirement-4-health-safety-and-security.pdf?blobnocache=true>

³ <https://www.ebrd.com/documents/environment/safe-working-in-confined-spaces>

⁴ <https://www.ebrd.com/documents/strategy-and-policy-coordination/briefing-note-bn03-working-safely-around-asbestos-pipes.pdf?blobnocache=true>

	<i>NB: Details about the content of the plans are provided in the ESMP</i>					Surveillance, fencing, etc, in place
4c	Develop a Worker Code of Conduct and have all construction / maintenance workers sign it; the Code is to include as a minimum	Minimisation of the OHS and community health and safety risks of the Project during construction	EBRD PR4, PR2 National regulations	Internal resources, External consultants Responsibility: PMU in cooperation with ASWRA, supported by PIS consultants as applicable; ASWRA - during operations.	Prior to construction works & upon hiring new workers	Worker Code of Conduct adopted, signed by workers and complied with
4d	<ul style="list-style-type: none"> Construct the new WWTP facilities according to Project documentation approved by competent authorities and EU public safety directives. Prior to the construction fence-off both WWTP sites. 	Minimisation of the OHS and community health and safety risks of the Project during construction	EBRD PR4, EBRD Guidance Note PR 4 National regulations	Internal resources, External consultants Responsibility: PMU in cooperation with ASWRA, supported by PIS consultants as applicable.	Prior to construction	WWTP facilities constructed to the EU/EBRD standards and national requirements.
4e	Establish a water quality monitoring regime that ensures compliance with both national requirements and the requirements of the applicable EU Urban Waste Water Treatment Directive. This includes monitoring all required parameters, and following sampling frequencies and methods outlined in the directive.	Optimisation of project's community health and safety performance with focus on safety of water supply.	EBRD PR4 National regulations	Internal resources, External consultants Responsibility: PMU in cooperation with ASWRA, supported by PIS consultant as required.	To be completed for EBRD's evaluation prior to operation start as applicable, then on ongoing basis	An updated water quality monitoring regime compliant with the EU Urban Waste Water Treatment Directive . Compliance with directive water quality standards periodically reported to EBRD.
4f	Require the Construction Contractor to prepare a Traffic Management Plan and obtain approval thereof prior to the start of construction. <i>NB: Details about the content of the plan are provided in the ESMP</i>	Risks for workers' and community health and safety during construction	EBRD PR4	Internal resources, External consultants Responsibility: PMU in cooperation with ASWRA, supported by PIS consultants.	To be completed in due time for EBRD's evaluation prior to the start of construction	Construction stage Traffic Management Plans developed and implemented.
4g	The Project design shall consider the seismic risk and apply the appropriate building codes.	Optimisation of worker and community health and safety during project lifecycle Optimisation of	EBRD PR4 National regulations	Internal resources, external consultants Responsibility: PMU in cooperation with ASWRA, design consultants.	During design phase	Design complies with applicable national seismic design requirements and GIP. Confirm compliance with relevant seismic

		infrastructure resilience				building codes in monitoring reports to EBRD.
4h	Prepare an Emergency Response Plan for i) construction and ii) operations, approve them in accordance with the established procedure and implement. <i>NB: Details about the content of the plans are provided in the ESMP.</i>	Optimisation of worker and community health and safety during project lifecycle	EBRD PR4 National regulations	Internal resources, External consultants Responsibility: PMU in cooperation with ASWRA, supported by PIS consultant as required.	To be completed in due time for EBRD's evaluation prior to the start of construction and operation as applicable, then on an ongoing basis	Construction Emergency Response Plan developed and implemented. Operations Emergency Response Plan developed and implemented.
4i	Assess security staff as per EBRD's PR4, should ASWRA decide to engage armed guards from a private security agency	Ensuring proper security and avoid risks to community	EBRD PR4 National regulations	Internal resources, External consultants Responsibility: PMU in cooperation with ASWRA, supported by PIS consultant as required.	Prior to operations	Assessment of security staff completed and reported to EBRD
PR5 Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement						
5a	<ul style="list-style-type: none"> Prepare a Resettlement Framework (RF) to outline the potential impacts of land acquisition and land use restrictions due to the Project. Consult local farmers and authorities about the availability of alternative community pastures ensuring local authorities allow access by affected farmers; include the results in the RF. Include a dedicated grievance mechanism in the RF 	Risk of negative impacts from physical and/or economic displacement.	EBRD PR5, EBRD Guidance Note PR5: Land Acquisition and Resettlement ⁵ National regulations	External consultants (hired by the EBRD)	During the ESIA	RF prepared, approved by ASWRA and EBRD
5b	During the detailed design:		EBRD PR5, EBRD	Internal resources,	During detailed	Actions taken to

⁵ 5 EBRD Guidance Note PR5: Land Acquisition and Resettlement (2023) provides practical guidance on interpreting and implementing PR5. This is available online at: <https://www.ebrd.com/documents/environment/land-acquisition-restrictions-on-land-use-and-involuntary-resettlement.pdf?blobnocache=true>

	<ul style="list-style-type: none"> route the effluent pipeline to avoid or minimise the impact on private land; Include air emissions mitigation in the detailed design of the WWTP to reduce the SPZ area; Site the WWTP facilities to ensure primary emissions sources are as far as possible from residential areas and arable lands, at least equal to the normative SPZ distance (500m). 		Guidance Note PR5: Land Acquisition and Resettlement National regulations	External consultants Responsibility: PMU in cooperation with ASWRA, supported by design consultants	design	minimise displacement impacts and reported to the EBRD
5c	Develop a SPZ Design Document and have it approved, following consultations with environmental and sanitary-epidemiological authorities				During detailed design	SPZ Design Document approved and SPZ established
5d	<ul style="list-style-type: none"> If detailed design confirms resettlement prepare and implement a Resettlement Plan (RP) (including relevant livelihood restoration). Conduct consultation with displacement - affected persons, including vulnerable households (if any) and document in the RP. Include mitigation for both anticipated impacts on public facilities and accidental damage during construction in the RF and RP. As part of the RP, develop monitoring provisions and indicators, and monitor during the implementation. Regularly report to EBRD 			Internal resources, External consultants Responsibility: PMU in cooperation with ASWRA and other consultants	During detailed design	RP adopted and implemented
5e	Monitor performance of the Construction Contractor in terms of impacts on land and assets and oblige the Construction Contractor to remediate any damage in line with the RF and RP requirements.	Compensation for unpredicted losses.		Internal resources, External consultants Responsibility: PMU in cooperation with ASWRA and other consultants	During construction	Monitoring in place, reporting to the EBRD
5f	If a RP is triggered during detailed design hire a competent resettlement / livelihood restoration expert to train ASWRA's staff	Improved capacity for monitoring of resettlement		Internal resources, Responsibility: PMU or other consultants to	Prior to RP implementation	Relevant ASWRA's staff trained

	responsible for supervising and/or implementing the RF and RP.			provide such training to ASWRA		
5g	Upon implementing the PR prepare a Resettlement Completion Report			Internal resources, External consultants Responsibility: PMU in cooperation with ASWRA, supported by PIS consultant as required.	Once the RP is implemented	Completion Report provided to the EBRD
PR6 Biodiversity Conservation and Sustainable Management of Living Natural Resources						
6a	Implement pre-construction surveys and mitigation measures as detailed in the Biodiversity Management Plan included in the Project ESMP	Preventing impacts on biodiversity	EBRD PR6 National regulations	Internal resources, External consultants Responsibility: PMU in cooperation with ASWRA, supported by PIS consultants as applicable, Construction Contractor during construction.	Pre-construction surveys – prior to the start of construction; mitigation – during construction and operations	Pre-construction surveys completed and reports provided to EBRD. Mitigation implemented during construction and operations
PR8 Cultural Heritage						
7a	<ul style="list-style-type: none"> Reduce the size of the construction corridor as much as possible; Limit vehicle movements and machinery activities to the cleared area within the construction corridor, and minimise the scale of earth works 	Precautionary measure to avoid impacts to cultural heritage.	EBRD PR 8	Internal resources, External consultants Responsibility: PMU in cooperation with ASWRA. Construction Contractor to implement	During construction	Cultural heritage impacts avoided. Site audits held.
7b	Prior to construction, develop and implement a Chance Finds Procedure and train the Construction Contractor and workers in applying the Procedure.	Discovery of previously unknown cultural heritage sites or items during site preparation / construction.				Chance finds procedures included in contract documents and implemented
PR10 Information Disclosure and Stakeholder Engagement						
8a	Build ASWRA's stakeholder engagement capacity by: <ul style="list-style-type: none"> appointing a corporate level stakeholder engagement specialist (at head office). 	Information disclosure and consultation prior to and during the	EBRD PR10	Internal resources, External consultants Responsibility: PMU in cooperation with	Prior to construction.	<ul style="list-style-type: none"> Corporate level stakeholder engagement specialist appointed.

	<ul style="list-style-type: none"> • appointing a Liaison officer in Ganja. • providing training on EBRD stakeholder engagement requirements for the Company staff in head - and Ganja office. • Designating staff to manage grievances (including registering and processing them, preparing and sending responses, etc.). 	construction stage as well as response to grievances. Resources provided for SEP implementation.		ASWRA		<ul style="list-style-type: none"> • Liaison officer in Gaja appointed. • Relevant staff trained
8b	Implement SEP activities related to the pre-construction (detailed design) and construction stages (including consultations on the detailed design and amendment to the ESIA, grievance mechanism and annual progress reporting to stakeholders).	Information disclosure and consultation during construction as well as response to grievances.	EBRD PR10 National regulations - EIA process	Internal resources, External consultants Responsibility: PMU during the construction stage (with support of ASWRA in Ganja and Construction Contractor).	Implement the SEP prior to and during construction	Stakeholder engagement and communication activities held during detailed design and construction stages documented.
8c	Update the SEP prior to operations and implement onwards (including evaluations and updates, as needed).	Information disclosure and consultation during operations as well as response to grievances.	EBRD PR10	ASWRA	Implement the SEP during operations	Stakeholder engagement and communication activities held during operations documented.
8d	<ul style="list-style-type: none"> • Implement a grievance mechanism, as part of the Project SEP, that is free and easily accessible, inclusive (including to vulnerable groups), and available throughout all stages of the Project. • Raise community awareness about the grievance mechanism through public notice / communication channels. 	Ensure that people affected by the Project can raise concerns and complaints which are handled in a systematic and transparent manner.	EBRD PR10	Internal resources, External consultants Responsibility: PMU during the construction stage (with support of ASWRA and Construction contractor). ASWRA - during operations.	Throughout construction and operations.	<p>Grievance mechanism implemented and communicated.</p> <p>Project grievance log-book maintained during detailed design, construction and operations.</p> <p>Grievances analysed and reported in the regular E&S monitoring reports to the EBRD</p>