

ELEKTROKRAJINA GRID REHABILITATION AND UPGRADE PROJECT

TECHNICAL, ENVIRONMENTAL AND SOCIAL
ASSESSMENT

Environmental and Social Management Plan (ESMP)

July 2026



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ABBREVIATIONS

EPRP	Emergency Preparedness and Response Plan
ESMP	Environmental and Social Management Plan
E&S	Environmental and Social
LTIFR	Lost Time Injury Frequency Rate
LV	Low-voltage
MV	Medium-voltage
O&M	Operation and Maintenance
OHS	Occupational Health and Safety
PIU	Project Implementation Unit
WMP	Waste Management Plan

1 INTRODUCTION

This Environmental and Social Management Plan (ESMP) has been prepared for the Elektrokrajina Grid Rehabilitation and Upgrade Project. The Project will be implemented by Elektrokrajina a.d. Banja Luka ("the Company").

The Project involves the rehabilitation and reconstruction of the existing medium-voltage (MV) and low-voltage (LV) electricity distribution network within Elektrokrajina's service area in Republika Srpska, Bosnia and Herzegovina. The planned works will include replacement of poles, conductors or both, depending on the condition and technical characteristics of individual network sections. The Project will be implemented within the existing distribution network corridors and operational footprints, without development of new large-scale infrastructure or new corridors.

The purpose of this ESMP is to define the environmental and social (E&S) mitigation, management and monitoring measures required to avoid, reduce or control potential impacts and risks during Project implementation. The ESMP also defines responsibilities for implementation and monitoring of the proposed measures.

The ESMP has been developed based on the findings of the E&S assessment, review of available Project documentation, discussions with Elektrokrajina representatives and site visits to selected MV and LV network locations. Given the large geographical coverage of the Project and the high number of individual intervention locations, the ESMP focuses on typical impacts and risks expected during rehabilitation works on the existing distribution network.

The ESMP will be implemented by Elektrokrajina, contractors and supervision engineers. Contractors will be required to comply with the ESMP and to implement all relevant measures during the execution of works. The Elektrokrajina Project Implementation Unit (PIU) will be responsible for overall coordination and oversight of ESMP implementation, while the Supervision Engineer, designated from Elektrokrajina's internal staff, will monitor contractor compliance and implementation of prescribed measures during construction works.

2 ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

PHASE	SUMMARY OF IMPACT/RISK	MITIGATION MEASURES	RESPONSIBILITY	MONITORING PARAMETERS
BIODIVERSITY AND PROTECTED AREAS				
Pre-construction	During the pre-construction phase, insufficient integration of bird protection requirements into the final technical design could increase future collision and electrocution risks for birds. This may be particularly relevant in areas used by sensitive or protected bird species, where the design of poles, conductors and related infrastructure can affect operational biodiversity risks. In addition, if protected-area requirements and sustainable timber sourcing are not properly addressed before construction, site-specific biodiversity sensitivities may be overlooked and the Project could indirectly contribute to unsustainable forestry practices.	– Prior to and during implementation of grid rehabilitation works, the final technical design and construction approach shall be aligned with the Bird Protection Plan (2023) and the internal procedure on maintenance, planning, development and construction of power lines from the perspective of bird protection. For existing structures, priority shall be given to retrofitting powerline components and/or installing bird rejectors where required, in order to reduce collision and electrocution risks. – Retrofitting of existing poles shall include, as applicable, one or more of the following measures: adjustment of line configuration to increase separation distances, insulation of exposed energised parts and/or grounded components, and application of perch management techniques. A minimum separation distance of 1.4 m shall be provided between energised phase conductors and between phase conductors and grounded hardware. Where this separation cannot be achieved due to	Elektrokrajina for inclusion into Tender Documentation, communication with the Republic Institute and supervision; Contractors for implementation (to continue into construction phase)	– Share of rehabilitated poles compliant with Bird Protection Plan requirements – Institute's Opinion obtained and applicable site-specific protection requirements incorporated into construction planning before works start in protected areas – Timber sourcing requirements included in tender documentation and contractor agreements – Number/percentage of wooden poles procured with verified legal and sustainable sourcing documentation – Records of suppliers, origin of timber and procurement documentation maintained by the Contractor

PHASE	SUMMARY OF IMPACT/RISK	MITIGATION MEASURES	RESPONSIBILITY	MONITORING PARAMETERS
		technical constraints, exposed parts shall be covered/insulated to reduce electrocution risk, in accordance with the Bird Protection Plan. — Prior to the start of rehabilitation works on grid sections located within protected areas, including Nature Monument Vrela Sane, Nature Monument Ljubačevo Cave and Park Forest Slatina, Elektrokrajina shall submit the relevant location data and maps to the Republic Institute for the Protection of Cultural, Historical and Natural Heritage of Republika Srpska. The Institute's opinion shall be requested to confirm applicable nature protection requirements and any site-specific mitigation measures to be implemented during the works. — Any measures or conditions prescribed by the Institute shall be incorporated into the construction planning and implemented by the Contractor. If the Institute's opinion is not obtained before the planned start of works, the affected grid sections or objects shall be excluded or deferred from the scope of works until the opinion is obtained, unless otherwise agreed with the Lenders. — Require all wooden poles to be sourced from legally harvested and sustainably managed forests. Contractors shall provide		



PHASE	SUMMARY OF IMPACT/RISK	MITIGATION MEASURES	RESPONSIBILITY	MONITORING PARAMETERS
		evidence of legal and sustainable timber sourcing, such as FSC, PEFC, chain-of-custody documentation, supplier declarations or equivalent proof. Timber from unknown or unsustainable sources shall not be used. These requirements shall be included in procurement specifications and contractor agreements, and sourcing documentation shall be reviewed before purchase or delivery to site.		
	Risk ranking before mitigation: Medium	Risk ranking after mitigation: Negligible		
Construction	During the construction phase, impacts may occur due to vegetation clearance and habitat disturbance due to access to poles, replacement of conductors, and rehabilitation works within existing corridors. This may temporarily affect grassland, shrub, agricultural, and forest-edge habitats.	- Ensure contractors comply with biodiversity protection requirements through contractual obligations and supervision. - Restrict works to existing access roads, corridors, and previously disturbed areas wherever possible. - Minimise vegetation clearance and avoid unnecessary removal of trees and shrubs. - Clearly mark work areas and temporary storage locations to prevent unnecessary disturbance outside the construction footprint. - Restore disturbed areas after completion of works, including	Contractors for implementation; Elektrokrajina for supervision	- Number of site observations of off-corridor movement - Number of trees/shrubs removed outside approved clearance zones - Presence of erosion, bare soil, or habitat degradation post-reinstatement (qualitative score)

PHASE	SUMMARY OF IMPACT/RISK	MITIGATION MEASURES	RESPONSIBILITY	MONITORING PARAMETERS
		reinstatement of vegetation where feasible.		
	Risk ranking before mitigation: Low	Risk ranking after mitigation: Negligible		
	Construction activities may also cause very short-term disturbance to fauna, including noise-related disturbance, and temporary displacement of wildlife. There is also a potential risk of disturbing bird nests located on electricity poles, particularly during the breeding season.	- Implement the existing Bird Protection Plan and associated procedures during planning and construction (primarily <i>Nest Management Policy and Maintenance, Planning, Development and Construction of New Transmission Lines from the Perspective of the Bird Protection Plan</i>). - Conduct pre-construction inspections of poles and conductors for active bird nests.	Contractors for implementation; Elektrokraina for supervision	- Percentage of poles/structures inspected prior to works (% coverage of planned sites) - Number of bird nests encountered and properly managed according to procedure
	Risk ranking before mitigation: Low	Risk ranking after mitigation: Negligible		
	Minor risks related to accidental pollution (e.g. fuel or oil spills), waste generation and soil compaction may also occur during construction activities. Nevertheless, such impacts are expected to be temporary and manageable.	Implement measures listed under sections "Water", "Land and Soil" and "Waste Management" below.	Contractors for implementation; Elektrokraina for supervision	In line with the parameters listed under sections "Water", "Land and Soil" and "Waste Management" below
	Risk ranking before mitigation: Low	Risk ranking after mitigation: Negligible		

PHASE	SUMMARY OF IMPACT/RISK	MITIGATION MEASURES	RESPONSIBILITY	MONITORING PARAMETERS
O&M	The main biodiversity-related risks are associated with bird collision and electrocution. These impacts are already characteristic of the existing distribution network and are not expected to increase as a result of the Project. However, even with the implementation of the measures, it cannot be completely avoided and some birds may still be impacted – albeit with a faster and more effective management.	- Implement all activities in accordance with the environmental management system certified under ISO 14001:2015. - Continue monitoring throughout operation phase in line with the Bird Protection Plan and associated documents (primarily <i>Monitoring, Data Analysis and Reporting Policy</i>).	Elektrokraina	- Number of bird mortality incidents recorded (electrocution/collision) per month/season - Number of corrective/adaptive management actions implemented based on monitoring results - Number of non-conformities identified during audits - Training coverage of personnel on Bird Protection Plan requirements
	Risk ranking before mitigation: Low	Risk ranking after mitigation: Negligible		
WATER				
Construction	Minor and localised impacts on surface water may occur during pole replacement works within 50 m of water bodies, mainly if accidental fuel or oil leaks, improperly handled protective coatings or paints, waste, or sediment from excavated material reach nearby watercourses through surface runoff, particularly during rainfall, on sloped terrain or close to watercourse banks. Limited groundwater impacts may occur in areas with shallow groundwater, mainly due to accidental spills, inadequate management of excavated material or improper handling of coating materials. Impacts are expected to be temporary and low in significance.	Implement the following surface water and groundwater pollution prevention and control measures: - Store excavated material away from watercourse banks and protect it from washout during rainfall by covering it with impermeable material. - Refuelling and maintenance of machinery and vehicles, handling of oils, paints and coating materials, as well as temporary disposal of waste, are prohibited near surface water bodies. - In areas with shallow groundwater, carry out excavation works carefully and report any signs of groundwater inflow or	Contractors for implementation of site-level water protection measures; Elektrokraina PIU for oversight and verification of contractor compliance; Supervision Engineer for monitoring.	- All excavated material generated at construction locations is stored away from watercourse banks and protected from washout by impermeable material - Supervision monthly reports demonstrating that the measures listed in the ESMP are implemented

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		contamination to the PIU and Supervision Engineer. – If groundwater inflow occurs, apply temporary sediment control measures, such as settling, filtration or controlled discharge to vegetated areas, to prevent uncontrolled discharge of turbid water. – If groundwater contamination due to accidental spillages is observed or suspected, stop works in the affected area and manage contaminated water or soil as hazardous waste. – Implement other measures defined under <i>Land and Soil</i> and <i>Waste Management</i>.		
	Risk ranking before mitigation: Low	Risk ranking after mitigation: Negligible		
LAND AND SOIL				

PHASE	SUMMARY OF IMPACT/RISK	MITIGATION MEASURES	RESPONSIBILITY	MONITORING PARAMETERS
Construction	Minor and localised impacts on land and soil may occur during pole replacement works due to small-scale excavations for concrete foundations, accidental spills, inadequate waste handling and improper management of excavated material or coating materials. Impacts are expected to be temporary and low in significance.	Implement specific land and soil protection measures for the management of hazardous substances, waste and excavated material during pole replacement works: — Limit soil and vegetation disturbance to the minimum area required for pole replacement and foundation works. — Store protective coatings and paints, and other hazardous substances, if any, in closed, leak-proof containers, with secondary containment where needed. — Prohibit handling of protective coatings and paints directly on unprotected soil. — Keep spill response material available at construction locations where construction machinery, protective coatings or paints are used. — In case of accidental spills, immediately collect contaminated material and manage it as hazardous waste. — Check machinery and vehicles for oil and fuel leaks before the start of works. — To prevent accidental fuel and oil spills at the construction site, refuelling and maintenance of machinery and vehicles are prohibited on the construction site.	Contractors for implementation of site-level land and soil protection measures; Geological Expert for assessment of soil bearing capacity at pole locations, where required; Elektrokraina PIU for oversight and verification of contractor compliance; Supervision Engineer for monitoring.	— Soil and vegetation disturbance limited to the minimum area required for pole replacement and foundation works — Records confirming that protective coatings and paints, and other hazardous substances, if any, are stored in closed, leak-proof containers, with secondary containment where needed — Records confirming availability of spill response material at construction locations where construction machinery, protective coatings or paints are used — 100% of accidental spills cleaned immediately, with contaminated material managed as hazardous waste — Site inspection records confirm no refuelling or maintenance of machinery and vehicles carried out on the construction site — Disturbed land and vegetation reinstated after completion of works — All pole foundation works carried out in accordance with Elektrokraina's

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		- Reinstate disturbed land and vegetation after completion of works. - Implement other measures defined under <i>Water and Waste Management</i>. Additionally, follow the technical soil stability requirements defined in Elektrokrajina's Methodology for the reconstruction of the LV and MV network. Pole foundation works have to be carried out in accordance with these requirements and under the supervision or instruction of authorised qualified persons, including a geological expert where required.		technical soil stability requirements and under qualified supervision, including a geological expert where required Supervision monthly reports demonstrating that the measures listed in the ESMP are implemented
	Risk ranking before mitigation: Low	Risk ranking after mitigation: Negligible		
WASTE MANAGEMENT				
Construction	Waste generation is expected during dismantling and replacement works of existing MV and LV network elements, including removed poles, conductors, fittings, insulators and associated network equipment. Limited quantities of excavated material, packaging waste and municipal waste may also be generated. No transformer works are planned, and transformer oil waste will not be generated. Hazardous waste may occur only where removed wooden poles or metal elements contain protective coatings or preservatives. Impacts are expected to be temporary, localised and low in significance.	Elektrokrajina to provide the contractor with its valid Waste Management Plan (WMP), prepared in accordance with the applicable waste management legislation of RS. The contractor has to implement all measures defined in the Company's WMP that are relevant to the management of non-hazardous and hazardous waste during reconstruction activities. In addition to the measures defined in the WMP, the contractor has to apply the following Project-specific requirements: Where removed wooden poles are not confirmed to be chestnut poles without chemical treatment, including older fir	Contractors for implementation of the Company's WMP and site-level waste management measures; Elektrokrajina PIU for oversight and verification of contractor compliance; Supervision Engineer for monitoring.	- Company's WMP provided to the contractors before commencement of reconstruction works, with evidence that relevant WMP requirements for non-hazardous and hazardous waste management are implemented; - Records confirming that removed wooden poles not confirmed as untreated chestnut poles are managed as hazardous waste.

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		poles or other wooden poles potentially treated with chemical preservatives, coatings or impregnation agents, the contractor has to treat such waste as hazardous waste and implement all WMP measures related to hazardous waste management. After completion of construction works, as agreed with the Company, arrange transport and handover of collected waste to the designated person at the Company's temporary storage location within the relevant field unit for further waste management.		
	Risk ranking before mitigation: Low	Risk ranking after mitigation: Negligible		
O&M	During the operational phase, waste may be generated during maintenance, repair or replacement of damaged poles and specific network sections. Additional hazardous waste may also be generated during maintenance of transformers or transformer substations, including transformer oil and other associated waste. At present, the WMP does not classify removed wooden poles as hazardous waste. However, if removed wooden poles are not confirmed to be chestnut poles and may contain chemical impregnation, protective coatings or preservatives with hazardous characteristics, they have to be managed as hazardous waste. Provided that waste is managed in accordance with the Company's Waste Management Procedure and WMP,	Elektrokrājina to continue implementing its internal WMP during the operational phase, including collection, sorting, temporary storage, record keeping and handover of non-hazardous and hazardous waste to authorised operators, in accordance with applicable legal requirements. Upon the next scheduled five-year update of the WMP, Elektrokrājina to include waste wood from distribution network poles as a separate hazardous waste stream, where poles are not confirmed to be untreated chestnut wood, together with the relevant handling, temporary storage and handover requirements.	Elektrokrājina	- Waste management carried out in accordance with the internal WMP - WMP updated upon expiry of its five-year validity period to include waste wood from treated distribution network poles as a separate hazardous waste stream, with handling, temporary storage and handover requirements specified - Records of all waste streams generated maintained at company level, including waste type,

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	including the updated provisions on hazardous waste wood where relevant, the impact is expected to be low.			quantity and storage location – Evidence of handover of all waste streams to authorised operators retained, including transfer documentation and operator licences
	Risk ranking before mitigation: Low	Risk ranking after mitigation: Negligible		
CLIMATE CHANGE				
Pre-construction	The Project area is exposed to climate-related and natural hazards including heavy rainfall, river and surface-water flooding, storm winds, thunderstorms and lightning, hail, heavy wet snow, snowdrifts, ice loading, heatwaves and wildfire risk. Elektrokrājina has an existing Plan for Protection and Rescue from Natural Disasters and Other Accidents; however, the Plan was adopted in 2015 and has not been updated to reflect current operational conditions, available technologies or relevant climate projections and future climate-related hazard trends.	Elektrokrājina to review and update the <i>Plan for Protection and Rescue from Natural Disasters and Other Accidents</i>, so that it reflects current operational conditions and is informed by relevant climate projections and future climate-related hazard trends. Please also see <i>Section Community Health and Safety</i> for additional provisions regarding the Plan update.	Elektrokrājina	– Updated Plan for Protection and Rescue from Natural Disasters and Other Accidents prepared prior to commencement of construction works – Evidence that relevant climate projections and future climate-related hazard trends were considered during the update
	Risk ranking before mitigation: Medium	Risk ranking after mitigation: Low		
Construction	Climate-related hazards may affect worker safety, site access, traffic conditions, temporary excavation works, lifting and pole replacement activities, conductor stringing, storage of materials and emergency response logistics. Extreme heat may increase heat-stress risks for workers, while storms, lightning,	Elektrokrājina to require the contractors to prepare and implement an Emergency Preparedness and Response Plan (EPRP), aligned with the Company's updated emergency preparedness and response arrangements.	Contractors for preparation and implementation of the EPRP; Elektrokrājina PIU for approval of the EPRP, oversight and compliance verification; Supervision Engineer for monitoring.	– Contractor EPRP prepared and approved by Elektrokrājina PIU/Supervision Engineer prior to mobilisation – Evidence that the EPRP includes weather

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	wet snow, ice, flooding, landslides/rockfalls and wildfire events may require temporary suspension of works or adjustment of work schedules. Given the large geographical coverage of the Project and the possibility of multiple simultaneous work fronts, consistent application of weather-related controls by all contractors is required.	The EPRP is to include, as a minimum: – designation of the Contractor's responsible person for monitoring weather conditions and deciding on work suspension/resumption at each active work front, – daily review of official weather forecasts and warnings before mobilisation to site, especially for works at height, pole erection, lifting activities, conductor stringing, excavation and works in remote or difficult-access areas, – stop-work criteria for extreme weather conditions, including storms, lightning, strong winds, heavy rainfall, flooding, snow/ice events, extreme heat and wildfire risk, – communication procedures with Elektrokrajina, supervision staff and emergency services, – site access and safe exit arrangements in case of worsening weather conditions; – worker protection measures during extreme heat, storms, snow/ice and wildfire-risk periods.		monitoring, stop-work criteria, communication procedures and emergency response arrangements for relevant climate-related hazards
	Risk ranking before mitigation: Medium	Risk ranking after mitigation: Low		

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O&M	During operation, overhead MV and LV distribution infrastructure will remain exposed to extreme weather events, including heavy rainfall, flooding, storm winds, thunderstorms and lightning, hail, heavy wet snow, snowdrifts, ice loading, heatwaves, wildfire risk and falling vegetation. Such events may cause conductor damage, pole instability or failure, vegetation-related faults, restricted access to fault locations due to flooding, snow/ice or landslides/rockfalls, and temporary interruptions in electricity supply. The Project will reduce existing vulnerability through rehabilitation and reconstruction of deteriorated poles and conductors, including replacement of bare conductors with insulated conductors in selected sections; however, residual climate-related risks will remain during operation.	Elektrokrājina to regularly review, update and implement the <i>Plan for Protection and Rescue from Natural Disasters and Other Accidents</i> , at least every five years, so that it remains aligned with current operational conditions, relevant climate-change projections and future climate-related hazard trends. The update should also address clear stop-work criteria for extreme heat and other extreme weather conditions, weather monitoring and warning arrangements, and work planning/adaptation measures such as adjustment of working hours, rest breaks, water provision, shaded/rest areas where feasible and suspension of works during unsafe conditions.	Elektrokrājina	- Plan for Protection and Rescue from Natural Disasters and Other Accidents periodically reviewed and updated, where needed - Records of weather-related faults, outages and repair response times - Records of emergency interventions following storms, snow/ice events, floods, wildfire events or other extreme weather.
	Risk ranking before mitigation: Medium	Risk ranking after mitigation: Low		
OCCUPATIONAL HEALTH AND SAFETY				
Construction	Construction works involve hazardous activities including work at height, excavation, vegetation clearance, and operations in the vicinity of electrical infrastructure. All works are carried out in a de-energised state under Elektrokrājina's Permit-to-Work system, which contractors are required to follow without exception. Review of injury registers for 2023, 2024 and 2025 confirms that electrical contact and falls from height are the highest-severity incident categories, and the scale of the Project across over 43,000 intervention locations increases the risk of inconsistent procedure application by	- Contractors to comply with Elektrokrājina's Permit-to-Work system and the Five Golden Rules for all works on the distribution network, without exception. - De-energisation requests to be submitted to the relevant field unit at least 48 hours before planned works, in accordance with Elektrokrājina's procedures. - Pre-work toolbox talk to be conducted at each work site before commencement of activities, confirming safe	Contractors for implementation of site-level OHS measures; Elektrokrājina PIU and OHS department for oversight and verification of contractor compliance; Supervision Engineer for monitoring.	- Records of Permit-to-Work and toolbox talk completion at work sites - Records of de-energisation requests submitted and approved - Number and severity of contractor OHS incidents recorded, reported by field unit - Number of serious injuries and fatalities – target zero

PHASE	SUMMARY OF IMPACT/RISK	MITIGATION MEASURES	RESPONSIBILITY	MONITORING PARAMETERS
	contracted crews.	conditions and scope of authorised work. - Contractors to apply appropriate fall protection measures during all work at height, including pole climbing, ladder use and aerial work platform operations. - During vegetation clearance, contractors to ensure safe distances from operational conductors are maintained and appropriate PPE is worn, including eye and face protection during chainsaw operations. - During conductor stringing, cable drum stands with braking mechanisms and appropriate tensioning equipment to be used; tension force to be controlled during motorised winch operations. - Contractors to implement a road safety procedure for field crews operating vehicles during work travel, addressing driver behaviour and journey management. - All raised poles to be checked for vertical alignment from two mutually perpendicular directions before works continue. - Elektrokrájina PIU to verify contractor OHS competency and compliance with internal procedures prior to mobilisation and throughout the construction phase		- Records of contractor OHS inspections carried out by Elektrokrájina PIU and supervision engineer - LTIFR reported annually for the duration of the construction phase
	Risk ranking before mitigation: Medium	Risk ranking after mitigation: Low		

PHASE	SUMMARY OF IMPACT/RISK	MITIGATION MEASURES	RESPONSIBILITY	MONITORING PARAMETERS
O&M	Operational risks are consistent with Elektrokrajina's existing baseline activities and will be managed through established procedures. The replacement of deteriorated network components is expected to reduce the frequency of emergency fault conditions, which carry elevated OHS risk relative to planned works.	- All O&M activities to be carried out in accordance with Elektrokrajina's existing OHS management system, Permit-to-Work procedures and the Five Golden Rules. - Where external contractors are engaged for specialised maintenance works, they are required to comply with Elektrokrajina's internal OHS procedures.	Elektrokrajina field units and OHS department	- Number and severity of OHS incidents recorded during O&M phase - Number of serious injuries and fatalities – target zero - LTIFR reported annually
	Risk ranking before mitigation: Low	Risk ranking after mitigation: Low		
COMMUNITY HEALTH AND SAFETY				
Construction	Temporary and localised community health and safety impacts may arise from planned power interruptions, works near roads and settlements, minor access restrictions, and limited noise and dust nuisance. Electrical safety risks to the public are reduced as all works will be carried out in a de-energised state. Existing Elektrokrajina practices for advance consumer notification and sensitive consumer coordination provide an adequate basis for managing supply interruption impacts. Traffic management during works and emergency preparedness during the construction phase have been identified as areas requiring improvement and are addressed through the mitigation measures defined for this Project.	- Contractors to implement basic community safety measures at all work sites, including warning signs, physical demarcation of work areas and safe pedestrian and vehicle access around works. - Planned electricity interruptions to be announced in line with legal requirements and Elektrokrajina's existing notification practices under procedure EKP 25. - Sensitive consumers, including hospitals and known electricity-dependent users, to be informed in advance and supported where needed through existing backup power arrangements, coordinated by local Elektrokrajina staff. - Prior to works on or near public roads, contractors to prepare and implement site-specific traffic management arrangements coordinated with the relevant	Contractors for implementation of site-level measures; Elektrokrajina PIU and relevant technical departments for oversight, notification of planned interruptions, coordination with sensitive consumers, and update of the Plan for Protection and Rescue from Natural Disasters and Other Accidents; Supervision Engineer for monitoring.	- Records of notification of planned power interruptions - Site inspection records confirming implementation of traffic management arrangements and site safety measures at active work locations - Evidence of updated <i>Plan for Protection and Rescue from Natural Disasters and Other Accidents</i> prior to construction commencement - Number and type of public complaints received - Number of public incidents or near-misses recorded

PHASE	SUMMARY OF IMPACT/RISK	MITIGATION MEASURES	RESPONSIBILITY	MONITORING PARAMETERS
		authorities, including the municipality, road authority and Ministry of Interior where required, in the absence of a standardised company-wide Traffic Management Plan procedure. - Contractors to check the cadastre of underground installations before excavation or works that may affect underground utilities. - All works to be carried out in a de-energised state, in line with Elektrokrajina's electrical safety procedures and Permit-to-Work system. - Contractors to maintain access to properties and minimise temporary nuisance from noise, dust and traffic disruption throughout the duration of works. - As stated under Section <i>Climate Change</i>, Elektrokrajina to update its Plan for Protection and Rescue from Natural Disasters and Other Accidents prior to construction commencement to reflect Project-related activities, the increased number of simultaneously active work sites, and current operational conditions. - Emergency contact arrangements to be maintained during works, including communication with fire brigade, emergency medical services and civil protection where needed		



PHASE	SUMMARY OF IMPACT/RISK	MITIGATION MEASURES	RESPONSIBILITY	MONITORING PARAMETERS
	Risk ranking after mitigation: Low	Risk ranking after mitigation: Low		
LABOUR AND WORKING CONDITIONS				
Construction	Construction works will be carried out by contractors and supervised by Elektrokrajina Internal Supervision Engineers. A significant labour influx is not anticipated and workers are expected to be mainly local or regional, with no worker accommodation required. However, due to typical construction-sector risks, including seasonal work, subcontracting and cost pressures, there is a risk of non-compliance with labour requirements, such as undeclared work, excessive working hours, delayed or non-payment of wages/contributions, or lack of access to a worker grievance mechanism.	- Include labour and working condition requirements in contractor contracts, including compliance with the Labour Law of Republika Srpska and EBRD ESR2. - Require contractors to ensure written employment arrangements, legal working hours, payment of wages and contributions, and prohibition of informal/undeclared work. Require contractors to establish or make available a worker grievance mechanism. - Monitor subcontractor compliance with the same requirements.	Contractors for compliance with labour requirements and management of workers/subcontractors; Elektrokrajina PIU for oversight and inclusion of labour requirements in contracts; Supervision Engineer for monitoring.	- Contractor compliance with labour requirements - Availability of worker grievance mechanism - Worker grievance log
	Risk ranking after mitigation: Medium	Risk ranking after mitigation: Low		
CULTURAL HERITAGE				
Construction	No direct physical impacts on known cultural heritage assets are expected under the Project, as works are limited to existing OHL corridors and locations already in technical use. The interventions will involve the replacement of poles and/or conductors at existing locations or immediately adjacent to them, without significant excavation, deep ground disturbance, or the development of new infrastructure corridors, which further reduces the likelihood of encountering previously unknown archaeological remains. However, due to the wide geographical	Require contractors to develop and implement a Chance Finds Procedure and provide basic training/toolbox briefing to workers on how to recognise and respond to potential chance finds before works involving ground disturbance commence.	Contractors for implementation of the Chance Finds Procedure; Elektrokrajina PIU for oversight and verification of contractor compliance; Supervision Engineer for monitoring.	- Chance Find Procedure developed - Number of chance finds recorded

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	coverage of the Project, the possibility of chance finds during minor excavation or pole replacement works cannot be fully excluded.			
	Risk ranking before mitigation: Low	Risk ranking after mitigation: Low		





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