

**Document title:** LABOUR AND WORKING CONDITIONS MANAGEMENT PLAN

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**Project:** THE DEVELOPMENT OF THE ROMANIAN GAS TRANSMISSION SYSTEM  
ALONG BULGARIA-ROMANIA-HUNGARY-AUSTRIA  
ROUTE, PODISOR – GMS HORIA AND 3 NEW COMPRESSOR STATIONS  
(JUPA, BIBESTI AND PODISOR) (REFERENCE NUMBER IN EU LIST: 6.24.2)

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**ABBREVIATIONS USED ON PLAN:**

**LWCMP**-Labor and Working Conditions Management Plan

**HSSE**-Health, Safety, Security and Environment

**PMU**-Project Management Unit

**CUP**-Contact Unit Point

**SoW**-Statement of Work

**CESMPs**-Construction Environmental and Social Management Plans

**F-ECSMPs**-Framework- Construction Environmental and Social Management Plans

**SNTGN**-The National Company for Natural Gas Transport

**PSD**-Project Source Documents

**KPI**-Quality Performance Indicators

**EBRD**-European Bank for Reconstruction and Development

**HSE-MS**-Health Safety and Environment-Management System

**CHSMP**-Community , Health and Safety Management Plan

**ERMP**-Emergency Response Management Plan

**HSSMP**-Health, Safety and Security Management Plan

**CSR**-Corporate Social Policies

**GD**-Governmental Decision

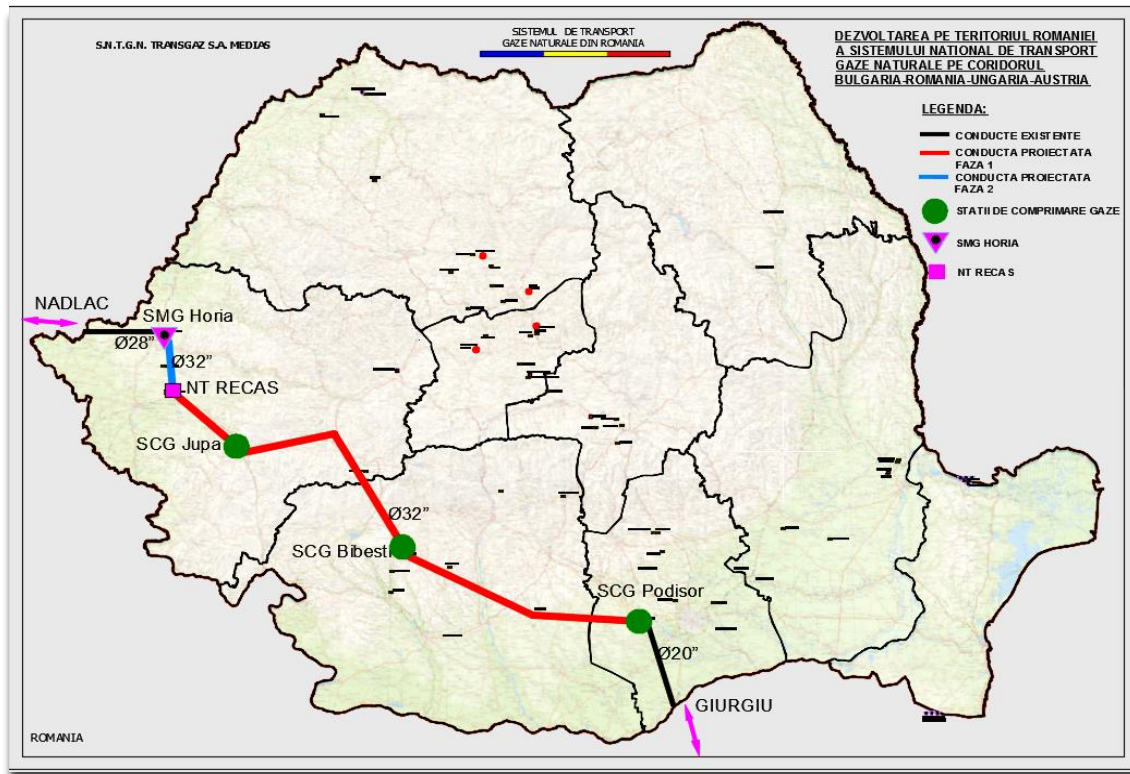
**OJ**-Official Journal

**JOCE**-Journal Official of Community European

## **1. INTRODUCTION**

### **1.1 PROJECT OVERVIEW**

SNTGN Transgaz SA Medias (“Transgaz”, “the Company” or “the Beneficiary”), the licensed operator of the Romanian National Gas Transmission System, is developing a 529 km natural gas pipeline between Podisor in southern Romania and Horia in the west of the country (the “Project”). The pipeline, which for much of the route will be buried and will upgrade or run alongside existing pipelines, represents the Romanian section of the Bulgaria-Romania-Hungary-Austria Natural Gas Transmission Corridor. In addition to the pipeline itself, the Project will also require construction of three new Gas Compressor Stations (GCS) at Podisor, Bibesti and Jupa, as well as a range of supporting infrastructure including block valve stations, construction camps, pipe storage areas, watercourses and infrastructure crossings and access roads.



Whilst the majority of the route is on land currently used for farming, it does pass through a number of specifically sensitive areas, including seven Natura 2000 Sites, and the nationally important Dinosaurs Geo-Park. It also passes close to a number of sites of archaeological value including the ancient city of Tibiscum near Jupa. In some of these areas, as well as near major roads and railways and for the 8 major rivers, this will involve the use of horizontal directional drilling. In other areas in the mountains special “hammering techniques” may also be applied.

## 1.2 ENVIRONMENTAL AND SOCIAL COMMITMENTS

The Project is subject to various environmental and social requirements that are managed by the Company through the implementation of its Health, Safety and Environmental Management System (HSE-MS)<sup>1</sup>. This HSE-MS includes a specific Project Framework Construction Environmental and Social Management Plan (F-CESMP) as well as associated topic/activity specific Construction Environmental and Social Management Plan (CESMPs). Operational phase ESMPs will be developed at a later stage prior to BRUA operation. The overall approach to integration of the above documents is described in the F-CESMP document itself.

The environmental and social commitments regarding the Labour and Working Conditions Management Plan (LWCMP) can be found in Appendix 1 along with general mitigation measures and management actions.

### 1.3 DOCUMENT MANAGEMENT

Documents will be managed and controlled by the Document Control and Archiving Compartment within BRUA Project Management Unit. The methods for document management and improvement during the construction phase will be described in the Document Guide to be developed by BRUA PMU.

The Beneficiary and the Contractors will establish contact point units to monitor actions, events and to correct the errors at site level. All the proposed solutions will be reported to BRUA PMU, Management of Change unit. This structure is responsible for decisions, under Project manager- management services approval, for drawing procedures able to be applied on all sites or on specific sites, and for updating the LWCMP documents. The Contractors will be responsible for assuring that all national legal requirements related to labour and working conditions of all their employees and the employees of sub-contractors are fully respected. The contractors will have to develop a workers accommodation plan that must be presented to Transgaz and approved by BRUA PMU prior to its implementation.

## 2. DOCUMENT PURPOSE AND SCOPE

### 2.1 PURPOSE OF THE CESMPs

The overall purpose of the CESMPs is described in the F-CESMP Document. Labour and Working Condition Management Plan (hereinafter LWCMP ) consolidates and specifies aspect-specific commitments, actions and legal/permit requirements from key Project Source Documents and identifies:

- Required management actions to help mitigate Project impacts.
- Associated environmental and social monitoring requirements.
- Roles and responsibilities in respect of these management and monitoring measures.
- Competency and training requirements.
- Key Performance Indicators (KPIs) for these elements for assessing performance.
- Verification procedures to ensure that objectives of the plan are met.

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<sup>1</sup> Integrated Management Manual Quality-Environment-Occupational Health and Safety, code MSMI-CMSSO Ed. 03/Rev.

Where the LWCMP describes required mitigation and monitoring actions, responsibility for such actions is allocated mostly to the contractors, but could also be allocated to Transgaz. In some instances actions are described by cross-reference to other Project documents where this is appropriate.

## 2.2 PROJECT APPROACH TO LABOUR AND WORKING CONDITIONS MANAGEMENT PLAN

BRUA project is a linear one which will involve the mobilisation of a large number of employees during a limited period of time. Assuring good labour and working conditions for all persons whom will be engaged during the BRUA implementation process is of high priority for Transgaz. The majority of employees will belong to Transgaz contractors or their sub-contractors. Still, Transgaz principles related to labour and working conditions will have to be implemented by all parties engaged in the project implementation. The accommodation will be the responsibility of the Contractors, which will have to draft their own plan in this regard, in compliance to the national and international legislation and norms, but also to the current LWCMP.

The LWCMP represents an instrument that guides the Constructors, regarding the compliance with bidding documentations, in order to:

- respect labour and working conditions for all their employees and the employees of their sub-contractors
- respect social and environmental conditions on sites and on work front;
- promote workers conditions and rules for health, safety and security;
- promote workers positive behaviour on the pipe route settlements;
- reduce negative impact of the Project;

In particular, the provision of this Plan shall meet national legislation and international good practice in relation, but not restricted, to the following:

- Provision of all rights for all workers as envisaged in the national legislation
- All workers belonging to contractors and/or sub-contractors (and all other third parties) should be legally registered
- Development of a worker registration system that enables Transgaz to keep track of all workers on each site and to identify the person (organization) for whom they are directly working
- Each contractor/sub-contractor should develop a register for all their workers. This register should contain data such as: name, age, sex, hours worked, wages, payments (including overtime payments) made and any deductions made from their wages. The register should be in line with national requirements on registration of workers.
- Establishing a coherent and integrated grievance mechanism for all workers engaged in the BRUA project (from Transgaz, its contractors and their sub-contractors)
- Development of a workers accommodation plan that should consider aspects such as:
  - the provision of minimum amounts of space, heating, ventilation for each worker;
  - provision of sanitary, laundry and cooking facilities and potable water;
  - the location of accommodation in relation to the workplace;

- any health, fire safety or other hazards or disturbances and local facilities;
- the provision of first aid and medical facilities;

There are several stages to the process of addressing issues raised by workers' accommodation. These are:

- assessing whether housing is needed for the project and if so, what sort;
- assessing impacts on local communities and planning mitigation of potential negative impacts;
- awareness of the national and local regulatory framework;
- determining the standards to apply to the location of facilities, the construction of housing and provision of facilities;
- managing accommodation.

## 2.3 PURPOSE OF THIS LWCMP

LWCMP purpose is to offer Transgaz the general and specific guidance for ensuring that all contractors will be able to protect the workers' rights, health, safety and security during the project implementation period.

LWCMP sets the norms and regulations that will have to be respected by all contractors which will work for BRUA project. Also, there will be specific provisions for contractors that will organise worker's accommodations during project implementation. It also details the responsibilities of each party engaged in this process and defines the monitoring and evaluation criteria for its successful implementation.

## 2.4 SCOPE OF THE LWCMP

LWCMP defines the actions and measures necessary for:

- Ensure that the construction workforce required for the Project has suitable accommodation options throughout the entire construction period;
- Ensure that the construction workforce has minimal impacts on the local and regional communities, respect local culture and tradition, the social rules and legal frame;

LWCMP is developed:

- To outline actions necessary for the assuring that effective health, safety and security measures are considered by all contractors within the workers accommodation facilities;
- To ensure that all international standards for working, living and welfare within a workers accommodation facility are met by all contractors ;
- To minimise the accidental and intended critical situations;
- To detail specific control measures to be implemented by Contractors (and subcontractors)
- To make sure that the requirements stated in the ESIA findings, Supplemental Environmental, Assessment international standards, Romanian legislation, Lenders requirements and Project-specific construction permits are considered by all contractors and sub-contractors
- To make sure that Transgaz internal policies and procedures are fully acknowledged and respected by all contractors.

## 3. KEY POLICIES, LEGISLATION, NORMS AND STANDARDS

### 3.1 OVERVIEW

All legislative frame, policies and standards were taken into consideration for drawing this Plan, in order to promote best practices, to rise the efficiency and to answer to social and environmental requirements.

This section provides a summary of the policies, legal & regulatory requirements and other applicable standards relevant to this LWCMP. These relate back to the Project Standards Document. Where standards referred to below are inconsistent or contradictory, the Project approach is to apply the most stringent standard unless otherwise explained in the Project Standards Document. The Beneficiary will finalise this documentation, before construction phase, under ESMPs provisions, bidding documents, legal frame, EBRD recommendations and best practices identify on similar projects.

The Project's management are working to draw the glossary for documentation, the Manager for services being responsible.

### 3.2 COMPANY POLICIES

Transgaz has adopted an HSE policy and a Corporate Social Responsibility as is mentioned on F-CESMP, appendix 1 and 2. These policies apply to Transgaz and all activities carried out by the Company as part of this Project. The Beneficiary requires with this Plan to the Contractors, to respect his policies for health, safety, security and environment and also social policies, as follows:

- Integrated Management Manual on Quality-Environment-Health and Occupational Safety-Code: MSMI-CMSSO Ed.03/Rev.0
- CSR Transgaz policies, regarding the relations with the local communities;
- Others requirements provided on bidding documentation;

### 3.3 NATIONAL LEGISLATION AND PERMITS

The Project (and all contractors) will comply with all relevant national regulatory requirements (including specific permits – see below) as they apply to their activities. A summary of the most pertinent national relevant to the environmental and social performance of the Project is provided in the Project Standards Document, and also mentioned on each draw plan. All contractors are also required to comply with all relevant national regulatory requirements. Whilst contractors are required to verify the latest regulatory requirements themselves an indicative list of Romanian national legislation is provided on each plan mentioned on F-CESMP.



- Law no.319/14.07.2006 for Security and Safety on Labour-published on O.J. 646/26.07.2006. The Law transpose EU Directive no.89/391/CEE published on JOCE no. L183/1989;
- Law 53/2003-Labour Code;
- Law 286/2009-Criminal Code;
- G.D no 1425/11.10.2006 Methodological norms for Law 319/2006.
- G.D. no 300/ 2006 security and safety regulations for temporary and mobile sites;

Others GD which transpose EU directives:

- GD nO.1091/16.08 2006, regarding health and safety conditions for work places.The Decision transpose Directive no 1989/654/CEE, published on JOCE no. L 393/1989.
- GD no.1048/9.08 2006, regarding the use of protection equipments by workers on work places. The Decision transpose Directive 89/656/CEE, published on JOCE no.L393/1989.
- GD Or. 493/ 12.04 2006, regarding working conditions under noise risk. The Decision transposing Directive 2003/10/CE, published on JOCE no. L 42/2003.
- 8. GD. no. 1.876/ 22.12 2005, regarding working conditions under vibrations risk. The Decision transposing Directive 2002/44/CE published on JOCE no. L 177/2002.

Construction permits for the Project are issued by Romanian regulatory authorities. Key permits to be taken into account by the Project and its contractors are listed below. Contactors must also ensure that relevant requirements of the various construction-related permits for the Project issued by national (and local) regulators are addressed. Any requirements arising from the revision/amendment of those permits will also be applied. Key permits are summarised in the F-CESMP Framework Document.

- Construction Permits
- Building Permit
- Exhaustive Decision
- Environmental Agreement/Permit
- Archeological Discharge
- Urban Certificates

### 3.4 INTERNATIONAL STANDARDS AND COMMITMENTS

The international standards to be applied to the Project are categorised as follows:

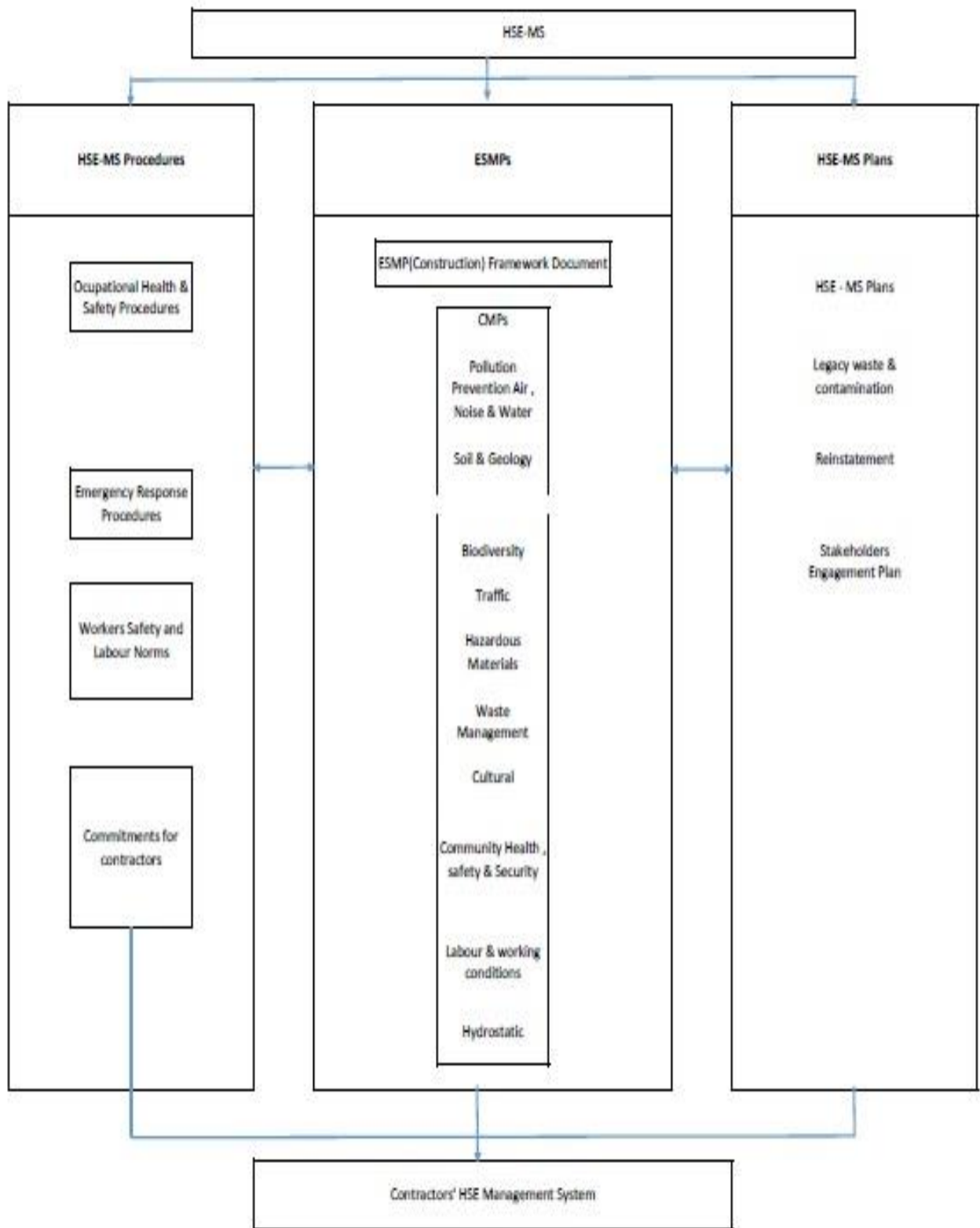
- Relevant Lender standards (primarily the EBRD Performance Requirements).
- Relevant international industry practice guidelines,
- Relevant international conventions ratified by Romania.
- Relevant inter-governmental agreements ratified by Romania.
- Any other additional Project-specific standards adopted for the Project.

The full list of applicable standards is described in the Project Standards Document, and on sectorial specific draws plans.

## 4. LINKAGES TO OTHER TRANSGAZ DOCUMENTS

### 4.1 OVERVIEW

This Plan forms part of the Project HSE-MS as described in the F-CESMP. Where relevant the CESMP should be read in conjunction with other HSES-MS elements including the ESMPs source documentation, control documentation and the key HSE-MS documentation. These are described further in the F-CESMP and illustrated in Figure 4.1 below:



## 4.2 LINKAGES TO OTHER CESMPs

The Plan has to be read in connection with F-CESMP and:

- Contractors Management Plan;
- HSSM Management Plan;
- Road and Traffic Management Plan;
- Water Management Plan;
- Community Health and Safety Management Plan.
- Waste Management Plan;
- Pollution and Prevention Management Plan;
- Hazardous Materials Management Plan;
- Culture and Heritage Management Plan

## 5. ROLES AND RESPONSIBILITIES

### 5.1 OVERVIEW

Operational procedures of cooperation between the representatives of the Beneficiary and the Contractor, including for the activity within the site, will be established in the Statement of Work (hereinafter SoW), a document that is attached to the trade agreement between the Beneficiary and the Contractor. Contact Point Unit in each site, as it was defined in the Management Plan of Contractors, is the responsible structure for implementing and monitoring the operational provisions of Work Statement and this Plan.

An integrated approach to workers accommodation management involves a range of stakeholders, including the Company, the Contractors (and subcontractors), local authorities and the neighbor settlements. Such a system therefore requires processes regarding management, information dissemination, training, designation of responsibility, actions, monitoring, control, and corrective actions.

Generic roles and responsibilities for the Company and Contractors are detailed below. An initial split of activities between key stakeholders is shown in Table 5.1 below with further information on specific responsibilities for CESMP actions outlined in Appendices 1 and 2 to this LWCMP.

**Table 5.1 Initial split of activities**

Activities	Beneficiary	Contractors
HR analysis / manpower analysis	X	x
Development and implementation of Employment plan		x
Development and implementation of retrenchment plan		x
Approval of labour and	x	

working conditions plans developed by contractors		
Management of workers' accommodation	x	x
Assign responsible persons for HR, community liaison and worker's accommodation management		X
Dissemination of information	x	x
Planning		x
Monitoring	x	x
Training	x	x
Control and Audit	x	x
Corrective actions		x
Management of cooperation	x	x

## 5.2 COMPANY ROLES AND RESPONSIBILITIES

Transgaz HSE management roles and responsibilities during the Project construction phase are detailed in the BRUA – UMP - Regulation of organization and functioning. Further information is also provided in other documents listed in the F-CESMP document.

With regards to this LWCMP, Transgaz S.A. is responsible for key management activities including:

- Development of bidding conditions regarding workers'accommodation conditions;
- Professional training of its representatives on site;
- Monitoring, evaluations and audit;
- Management cooperation in case of incidents (including registration and communication of events);
- Monitoring of corrective operations.

Specifically within the Company the following roles and responsibilities will apply:

Role	Responsibilities
Director general SNTGN TRANSGAZ SA	- Approves the Labour and Working Conditions Management Plan
Site coordinator, and HSSE Coordinator - Collaborates with all Contact point representatives	- Assures compliance of this Plan within the Project - Are generally responsible for the implementation of this Plan, including for Contractor implementation hereof - Develops, monitors and revises this plan - Assures necessary training for BRHA PMU staff on social

	<p>conditions</p> <ul style="list-style-type: none"> <li>- Centralizes the information regarding the work and rest time conditions</li> <li>- Assures the availability of this Plan to all BRUA PMU staff and Contractor staff</li> <li>- Makes audits and periodical inspections to the main Contractors for performance monitoring baselined on the requirements herein</li> <li>- Reports all risks, lack of conformities and incidents</li> <li>- Prepares an annual report that includes details about workers lives conditons and any incidents</li> <li>- Periodically verifications of accommodation conditions</li> <li>- Collect data from settlements</li> <li>- Collaborate with local authorities</li> <li>- Regular audits</li> </ul>
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### 5.3 CONTRACTOR ROLES AND RESPONSIBILITIES

Requirements for Contractors in relation to labour and working conditions as well as for workers accommodation are defined in the relevant aconditions mentioned on 2.1-2.4 subchapter and on their contracts and associated mandatory appendicies 1,2 ( defined also in tender documents) This requires that each contractor shall develop a LWCMP (as part of the overall contractor implementation plan) that shall be submitted to Transgaz for approval, and that the contractor shall ensure that the Plan is implemented. In addition each Contractor is required to ensure that it meets all topic-specific requirements outlined in the Plan that are relevant to its scope of work. The Contractor is also responsible for ensuring that any relevant subcontracted work meet these requirements.

**Worker camps and housing facilities should have a written management plan, including management policies or plans on health and safety, security, living conditions, workers' rights and representation, relationships with the communities and grievance processes.**

Part of those policies and plans can take the form of codes of conduct. The quality of the staff managing and maintaining the accommodation facilities will have a decisive impact on the level of standards which are implemented and the well-being of workers (for instance on the food safety or overall hygiene standards). It is therefore important to ensure that managers are competent and other workers are adequately skilled.

ROLE	RESPONSIBILITIES
	<ol style="list-style-type: none"> <li>1. <i>Draws management plans and policies especially HSSMP, ERMP, CHSMP, LWCMP.</i></li> <li>2. <i>Assign responsibilities related to human resources, management</i></li> </ol>

<p>CONTRACTORS</p>	<p><i>of the workers' accommodation and community liaison persons that could implement all the commitments as set in this management plan and other social documents developed by Transgaz within the BRHA project framework.</i></p> <p><b>3.</b> <i>If contractors are being used, there are clear contractual management responsibilities and monitoring and reporting requirements.</i></p> <p><b>4.</b> <i>Charging fees for the accommodation or the services provided to workers such as food or transport should be avoided where workers do not have the choice to live or eat anywhere else, or if deemed unavoidable, should take into account the specific nature of workers' accommodation. Any such charges should still leave workers with sufficient income and should never lead to a worker becoming indebted to an employer.</i></p> <p><b>5.</b> <i>The company or body in charge of managing the workers' accommodation should have the prime responsibility for ensuring workers' physical well-being and integrity. This involves making sure that the facilities are kept in good condition (ensuring that sanitary standards or fire regulations are respected for instance) and that adequate health and safety plans and standards are designed and implemented:</i></p> <ul style="list-style-type: none"> <li><i>• Health and safety management plans including electrical, mechanical, structural and food safety have been carefully designed and are implemented.</i></li> <li><i>• The person in charge of managing the accommodation has a specific duty to report to the health authorities the outbreak of any contagious diseases, food poisoning and other important casualties.</i></li> <li><i>• An adequate number of staff/workers is trained to provide first aid.</i></li> <li><i>• A specific fire safety plan is prepared, including training of fire wardens, periodic testing and monitoring of fire safety equipment and periodic drills.</i></li> <li><i>• Guidance on the detrimental effects of the abuse of alcohol and drugs and other potentially harmful substances and the risk and concerns relating to HIV/AIDS and of other health risk-related activities is provided to workers. It is best practice to develop a clear policy on this issue.</i></li> <li><i>• Workers have access to adequate preventive measures such as contraception (condoms in particular) and mosquito nets.</i></li> <li><i>• Workers have easy access to medical facilities and medical staff. Where possible, female doctors/nurses should be available for female workers.</i></li> <li><i>• Emergency plans on health and fire safety are prepared.</i></li> </ul>
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*Depending on the local context, additional emergency plans are prepared as needed to handle specific occurrences (earthquakes, floods, tornadoes)*

**6.** *Ensuring the security of workers and their property on the accommodation site is of key importance. To this end, a security plan must be designed including appropriate measures to protect workers against theft and attacks. Policies regarding the use of force (force can only be used for preventive and defensive purposes in proportion to the nature and the extent of the threat) should also be carefully designed. To implement those plans, it may be necessary to contract security services or to recruit one or several staff whose main responsibility is to provide security to safeguard workers and property. Before making any security arrangements, it is necessary to assess the risks of such arrangements to those within and outside the workers' accommodation and to respect national legislation as is mentioned on bidding documentation, best practices, including EBRD policies-PR4.*

- A security plan including clear measures to protect workers against theft and attack is implemented.*
- A security plan including clear policies on the use of force has been carefully designed and is implemented.*
- Security staff have been checked to ensure that they have not been implicated in any previous crimes or abuses. Where appropriate, security staff from both genders are recruited.*
- Security staff have a clear mandate and have received clear instruction about their duties and responsibilities, in particular their duties not to harass, intimidate, discipline or discriminate against workers.*
- Security staff have received adequate training in dealing with domestic violence and the use of force.*
- Security staff have a good understanding about the importance of respecting workers' rights and the rights of the communities.*
- Body searches are only allowed in specific circumstances and are performed by specially trained security staff using the least-intrusive means possible. Pat down searches on female workers can only be performed by female security staff.*
- Security staff adopt an appropriate conduct towards workers and communities.*
- Workers and members of the surrounding;*

**7.** *Freedoms and human rights of workers should be recognised and respected within their living quarters just as within the working environment.*



	<p><i>The Contractors rules and regulations should be presented to Beneficiary, if those exist, and should be reasonable and non discriminatory. It is best practice that workers' representatives are consulted about those rules. Contractors' rules and regulations should not prevent workers from exercising their basic rights. In particular, workers' freedom of movement needs to be preserved if they are not to become effectively "trapped".</i></p> <ul style="list-style-type: none"> <li><i>• Restriction of workers' freedom of movement to and from the site is limited and duly justified. It is good practice to provide workers 24/7 access to the accommodation site. Any restrictions based on security reasons should be balanced by the necessity to respect workers' freedom of movement.</i></li> <li><i>• Where possible, an adequate transport system to surrounding communities is provided. It is good practice to provide workers with free transportation to and from local communities.</i></li> <li><i>• Withholding workers' ID papers is prohibited.</i></li> <li><i>• Freedom of association is expressly respected. Provisions restricting workers' rights on site should take into account the direct and indirect effect on workers' freedom of association. It is best practice to provide trade union representatives' access to workers in the accommodation site.</i></li> <li><i>• Workers' gender and religious, cultural and social backgrounds are respected. In particular, workers should be provided with the possibility of celebrating religious holidays and observances.</i></li> <li><i>• The work time is regular on day time, from Monday to Friday and no more 6 hours on Saturday. The Contractors will provide to Beneficiary the work schedule, and respect Labour Code for details of work time and payments rules;</i></li> </ul> <p><i>8. Assure that provisions set in EBRD PR2 are incorporated along with the national requirements related to labour and working conditions in all the documents prepared by contractors and sub-contractors.</i></p> <p><i>9. The contractor(s) must ensure that all workers on site are provided with information on their terms and conditions, including hours, wages, breaks and holidays, discipline and termination procedures in a language they understand, and that all workers on site understand how to access an easily-accessible, confidential process for making complaints about their employment.</i></p>
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**CONCLUSIONS:**

The Beneficiary underline the obligation of Contractors to organize the prevention activities for environmental incidents, professional disease, fire Actions Plan,

The Constructors have the obligations to organize training activities regarding prevention of accidents and professional diseases, environmental incidents, and to organize action plans in case of accidental pollution events, fire, natural calamities and professional accidents and diseases.

The Constructors have to undertake:

- Risks identification and evaluation;
- Draw-up measures accordingly on HSSMP, WaterMP, Emergency Response MP, Waste MP, Culture and Heritage MP, Biodiversity MP, Community Health and Safety MP, Roads and Traffic MP;
- Periodically training and testing;
- providing personal protective equipment and check activities regarding use by all workers and also by site visitors;
- In case of emergency situation, break the work decision and emergency Plan application;
- Periodically evaluation of technical parameters of means, instalations, devices, vehicles;
- Risk prevent measures implementation;
- Permanent monitoring of accommodation, sanitary and social conditions;
- Monitoring of social impacts on settlements, near sites;
- Permanent monitoring of water and air quality;
- Periodically monitoring of noise and vibrations on sites offices and work places, on site and on proximity of sites;
- Surveillance and coordination of work activities;
- Appointment of HSSE, waste, technic and general coordinator site representatives;
- Appointment of staff for first aid rersponsibilities;
- Providing water sources, toilets, personal hygiene area, food preparation area, rest and leisure areas on site;
- Working time on compliance with outside temperature, water resources, and individual protective equipment, and also with payment procedures;
- To organize the collect and storage of waste and check periodically
- Periodically medical control for all staff.

## **6. MANAGEMENT, MITIGATION, MONITORING AND VERIFICATION**

### **6.1 MANAGEMENT ACTIONS**

The Plan was concluded to approach the followings:

- -obligations
- -data collection
- -monitoring

- -verification
- -audit
- -colaboration
- -decisions
- -corrective actions

The general management actions are treated along with the mitigation measures, in Appendix 1. The management actions and the mitigation measures are based on the commitments which every party will have; it is easy to remark that the compliance of the Constructors with the conditions and the recommended solutions are also measures to prevent and to improve significantly:

- -health;
- -safety
- -security;
- -satisfaction on labour;
- -social and economic comfort.

By the other side, the requirements referring to permanent collaboration with the local communities, management for waters and traffic, management for environment and waste, prohibition measures regarding alcohol and drugs consume, prohibition measures regarding hunting and fishing, possibility to use local facilities, are reasons for settlements satisfaction, and certain mitigation measures for the Project.

Not for the end, for Beneficiary safety and public image, it is important that all asked and recommended measures and conditions like on this Plan was mentioned.

All Constructor's workers and Beneficiary's representatives should be made aware of any rules governing the accommodation and the consequences of breaking such rules.

Processes that allow for consultation between site management and the resident workers will assist in the smooth running of an accommodation site. These may include a dormitory or camp committee as well as formal processes that allow workers to lodge any grievances about their accommodation.

Workers' living facilities have various ongoing impacts on adjacent communities. In order to manage these, the Contractors have to promote a thorough Community Relations Management Plan, in compliance with the socio-economic conditions of neighbouring settlements.

This plan will contain the processes to implement the findings of the preliminary community impact assessment and to identify, manage, mitigate or enhance ongoing impacts of the workers' accommodation on the surrounding communities.

Issues to be taken into consideration, according with Stakeholders Engagement Plan, Roads and Traffic Management Plan, Health and Safety Measures Plan, Community Health and Safety Management Plan and Emergency Response Plan, include:

- community development – impact of workers' camp on local employment, possibility of enhancing local employment and income generation through local sourcing of goods and services. Contractors should develop a Manpower study to identify the workforce needed during the project implementation period, the type and number of skilled, semi-skilled and unskilled labour force expected to be recruited in each stage of the project implementation period and the

retrenchment period and conditions. Based on this study, and the results of the community needs, the contractors will try to maximize local employment.

- community needs – ways to identify and address community needs related to the arrival of specific infrastructures such as telecommunications, water sanitation, roads, health care, education, housing
- community health and safety – addressing and reducing the risk in the increase in communicable diseases, corruption, trade in illegal substances such as drugs, alcohol, petty crimes and other sorts of violence, road accidents
- community social and cultural cohesion – ways to mitigate the impact of the presence of large numbers of foreign workers, often males, with different cultural and religious background, ways to mitigate the possible shift in social, economic and political structures due to changes in access to income generation opportunities.
- Retrenchment conditions – contractors will have to clearly indicate the conditions of retrenchment from an early stage of the project. Due to its nature, the current project has a limited duration and thus there will be cases of collective retrenchment. The contractors will have to comply with all the provisions of Romanian labour legislation in respect to retrenchment and the international best practices and IFI requirements.

### **Conditions**

1. Mechanisms for workers' consultation have to be designed and implemented. It is under provisions of Law 319/2006 to set up a review committee, which includes representatives elected by workers.
2. Processes and mechanisms for workers to articulate their grievances are provided to workers. Such mechanisms are in accordance also, with EBRD standards.
3. Workers subjected to disciplinary proceedings arising from behaviour in the accommodation should have access to a fair and transparent hearing with the possibility to contest decisions, under provisions of Law 53/ 2003-Labour Code.
4. In case conflicts between workers themselves or between workers and staff break out, workers have the possibility of easily accessing a fair conflict resolution mechanism, under Labour contract provisions.
5. In cases, where more serious offences occur, including serious physical or mental abuse, there are mechanisms to ensure full cooperation with the judiciary authority, under provisions of Law 286/2009-Criminal Code.

## **6.2 GENERAL MONITORING ACTIVITIES**

Community relations plans addressing issues around community development, community needs, community health and safety and community social, environmental and cultural cohesion have to be permanently monitored.

Community relations plans include the setting up of a liaison mechanism allowing a constant exchange of information and consultation with the local communities/authorities, in order to identify and respond quickly to any problems and maintain good working relationships. The Beneficiary will continue to maintain well inform about the Project all pipeline route settlements and local authorities, and to check, with the Contractor's representatives, the compliance with prohibited measures promoted, regarding:

- social behaviors of workers;
- not allowing illegally hunting and fishing;
- open fire use;
- disturbance of public order

The execution manager is in charge of implementing the community relations management plan and liaising with the community. The monitoring responsibilities will be nominated on plan.

Additional issue

The beneficiary have to analyse the offerts in compliance with all mentioned conditions and measures and to decide according with.

The Beneficiary’s representatives on sites - Managers for execution phase (pipeline and compressive station), HSSE coordinators, geodesists, archeologists, hydrologist and biodiversity experts - have to monitor the sites’ activities, in order to decide the operational corrective measures and to report information and events to UMP-BRUA.

At the level of the BRUA headquarter, the Manager for services and HSSE manager are responsables for all data analyse and draws decision in compliance with the needed, after HR experts proposals.

Alcohol is a complex issue and requires a very clear policy set by the workers’ accommodation management. On site areas and work places areas, the holding and consume of alcohol is stricted prohibited. The Contractors have to define the policies regarding the consume of alcohol on rest time, quantity, places and responsibilities.

### 6.3 MANAGEMENT SYSTEM VERIFICATION MONITORING

Management System verification monitoring requirements, as detailed in the F-CESMP Document, are divided into three levels as shown in Table 6.3 below:

Tier	Objective	Responsibl e	Description
<b>Tier 1:</b>	Transgaz management system audits	Transgaz	These audits are aimed at assessing the Transgaz HSSE management system elements and assessing their continued suitability throughout the project life cycle.- Anually
<b>Tier 2:</b>	Transgaz CESMP audits	Transgaz	These audits are undertaken by the Transgaz BRHA team to confirm compliance by the Company and its contractors with the CESMPs-Each semestry
<b>Tier 3:</b>	Contractor self-audits	Contractor	These audits are to be undertaken by contractors to confirm compliance by themselves and their sub-contractors with the CESMPs and their own HSSE management systems. The managing contractors shall ensure that audit reports are provided to Transgaz-Each quarter

In addition to the above, there are also expected to be regulatory audits and lender compliance monitoring visits. The nature and structure of these will be confirmed with regulators and lenders

#### 6.4 KEY PERFORMANCE INDICATORS

Both the General Monitoring and the Management System Verification Processes require robust Key Performance Indicators (KPI) to be developed. These are quantitative or qualitative measurements used to gauge performance over time and can be used to assess the effectiveness of control measures. The KPIs considered relevant to this LWCMP are shown in Table 6.4 below.

ID	KPI	Target/Action Threshold	Monitoring Measure	Associated mitigation controls
KPI-LWCMP 01	Number of non-compliance with the requirements of this plan	Minimise and continued improvement	See verification column of Appendix 1	All measures identified in Appendix 1
KPI-LWCMP 02	Number of non-compliance with project standards identified during monitoring	Minimise and continued improvement	See Appendix 1,2	As identified in 'KPI' column of Appendix 1
KPI-LWCMP 03	Number of incidents reported (accident or occupational disease)	Zero	See Appendix 2	N/A
KPI-LWCMP 04	Number of workers or settlements complaints	Minimise and continued improvement	See Appendix 2	All measures identified in Appendix 1
KPI – LWCMP 05	Lost of human lives	None		N/A

KPI- LWCMP 06	Number of trained person and means for intervention	Maximise and continued improvement	See Appendix 1,2	All measures identified in Appendix 1,2
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## 6.5 TRAINNING

Contractor is bound to assign one person from their own employees that would track and assure fulfillment of the workers' accommodation obligations,. The assigned person(s) need to have proper knowledge and skills as well as educational background on: HSS, including for social conditions and conflict resolution.

### Induction training

All contractors will have to conduct an induction training to all their employees and the employees of all their sub-contractors. The induction training will focus but not limit to following items:

- health and safety regulations for on site and workers accommodation
- social aspect – rules and regulations on community relationship and workers' code of conduct
- environmental aspects – rules and regulations related to environmental protection measures
- HR aspects
- grievance mechanism.

The Beneficiary and Contractors coordinators on site, will verify permanent the knowledge of regulations and also will check how all workers respect them,





## Appendix 1 – General Mitigation Measures and Management Actions

Ref	Topic/ Aspect	Objective	Mitigation Measures, Management actions and Commitments	In the plan	Resp monitor	Owner (C/T)	Verification Process	Commit ments Register Ref.
LWCMP - 001	All	overall	Comply with all mitigation measures included in the Environmental Agreement	All Plans	CPU	C	Permanent	1
LWCMP - 002	All	Record Preconstru ction Pipeline route conditions	For the pre-construction stage when work sites will be in place for each sector there will be a protocol that will establish as accurately as possible the environmental load, based on standardized forms (standard-forms), with aerial photographs or photographic images taken from the ground, which will act as control elements. For each site during the growing season (May-September the ecological structure and functions of the site will be accurately determined.		T	C/T	Permanent	287
LWCMP - 003	All	Prevention	The equipment shall be brought to the site in perfect state of operation, the technical revisions and oil exchange being already made	WMP, HSSM ,ERM P	HSSE+ TS- T/C	C	Permanent	87
LWCMP - 004	All	Prevention	Monitoring the meteorological bulletins meant to take the equipment outside the areas which could be flooded, in case of high waters	All Plans	SS-T	C	Permanent	31

LWCMP - 005	Throug hout	Environme nt protection	Prohibit all cutting of wood by workers.		SS+HSSE- C/T	C	Permanent	328
LWCMP - 006	all	Environm ent protection	Educate workforce on preventing bush fires. Ensure bush fires are not used as a land clearance method		SS+HSSE- C/T	C	Periodically/We ekly	341
LWCMP - 007	all	Work safety	Construction will only take place during daylight hours, if the activities are not continuos or execution time is not enough	HSSM	SS+HSSE- C/T	C	Permanent	393
LWCMP - 008	Local Comm unities	Prevention for safety and security	Implement measures to reduce the impact on socio-economic environment even before the start of works (setting deviation routes, installation of sound-deadening panels, demarcation and installation of Warning elements related to the area of the works, provision of alternative network of utilities, etc.)	CHSS MP, HSSM P, RTMP	SS –C/T	C	Permanent	172
LWCMP - 009	Entire Project	Environme nt protection	Strictly prohibit fishing at watercourses (EXCEPT WHEN ALL LEGAL CONDITIONS ARE FULLFILLED).	CHSS MP	SS – C/T	C	Periodical	188
LWCMP - 010	all	Labor conditions	Although BRHA's work force is not meant to incorporate any workers outside of the ethic demographic already presented within the local communities within the pipeline sphere of influence, strict adherence to the Worker's Code of Conduct that will be developed by Transgaz will aid in mitigating any unforeseen issues regarding community disturbance.	CHSS MP	SS C/T	C	Periodical	279
LWCMP - 0011	Throug hout	Environme nt protection	Implement and enforce hunting ban on the workforce (EXCEPT WHEN ALL LEGAL CONDITIONS ARE FULLFILLED).	CHSS MP	SS+ER – C/T	C	Permanent	325

LWCMP - 0012	Entire Project	Environment protection	Prohibiting weapons/ hunting for Project personnel, including subcontractors, both on site and while travelling to and from Project work areas	CHSS MP	SS+ER SE -C/T	C	Periodically/each quarter	208
LWCMP - 0013	Throughout	Community safety	Minimise exploitation and destruction of resources present and associated secondary impacts	CHSS MP	SS+HS SE C/T	C	Permanent	17
LWCMP - 0014	Permanent change to cultural identity left behind due to work force influence	Labor conditions	Continual reinforcement of the Worker's Code of Conduct for permanent staff, most specifically in areas influenced by staff of the 3 compressor stations	HSSMP	SS+HS SE	C	Bidding period	281

LWCMP - 0015	all	Labor conditions	<p>General construction hours will be in accordance with the guidance of the planning permission document (Condition 6). Limited to:</p> <p>between 07:30 and 17:30 Monday to Friday; between 07:30 and 13:30 Saturdays; and, no operations on Sundays and during bank/public holidays, except situation when schedule ar type of activities involves continuos work, but with legal compensation.</p> <p>Prior liaison with the Romanian Planning Authority regarding any requirements for out of hours work for Health and Safety, or emergency reasons; Appropriate complaint procedure to ensure complaints are logged, investigated and resolved; and, Control of noise introduced into site induction to ensure that all operators on site, including contractors, are working in such a way to minimise noise.</p>	HSSM P	SS+HS SE + AE – C/T	C	Permanent	246
LWCMP - 0016	Throug hout	Prevention	The acquisition of chemicals for which the supplier may provide the proof of their pre-registration with the European Chemicals Agency shall be pursued		ER - C/T	C	Permanent	85

LWCMP - 0017	All	Waste Management Principles	Contractors will draw up its own Waste Management plans based on selective collection of waste for recycling / recovery / disposal; These will cover the following 'good site practices' to reduce the risk of impacts arising from waste management activities: <ul style="list-style-type: none"> <li>• develop inventory of likely wastes;</li> <li>• identification of local waste management facilities;</li> <li>• waste minimisation principles;</li> <li>• maximise reuse/recycle opportunities;</li> <li>• waste segregation (liquid and solid/reusable and recyclable);</li> <li>• waste collection, storage and transfer;</li> <li>• specific disposal procedures for all waste streams identified including waste transfer notes if moved to a licensed offsite facility;</li> <li>• auditing and reporting procedures; and</li> <li>• measures to be taken after construction works are completed, so as to assure the disposal and turning into value of all waste from the construction sites, including the waste resulted from the removal of temporary structures.</li> </ul>	WMP	ER - C/T	C	Periodically/each semester	WM 001
LWCMP - 0018	All	Waste Management Principles	Hazardous waste or hazardous materials will be collected selectively at the site organization will be handed over authorized operators <b>There will be no incineration of hazardous waste on site.</b> Containers of hazardous waste will only be moved or transferred to the site by qualified personnel using appropriate equipment and vehicles	WMP	ER C/T	C	Periodically	WM 002
LWCMP - 0019	All	Waste Management Principles	Personnel involved in waste management will benefit from regular training, specific to each product and where relevant including general requirements for hazardous waste management	WMP	ER C/T	C	periodically	WM 003

LWCMP - 020	All	Waste Management Principles	For each contract, the waste management solution will be assessed, and contracts with entities entrusted with these responsibilities for each type of waste separately will be elaborated. Operators will keep track of the waste.	WMP	ER C/T	C	Permanent	WM 004
LWCMP - 0021	All areas, but especially areas with large mammals	-Waste Management Principles	The proper waste management will be put in place. Particular attention will be directed to the household or those containing food scraps. Waste from the work fronts will be stored in bins provided with trash bags and will be removed daily to the site organization. At the site organization collection points will be arranged provided with containers for each type of waste. For household waste a metal container with a tightly fitted lid will be used	WMP	ER C/T	C	Permanent	WM 005
LWCMP - 0022	All	Waste Management Principles	Contractors will reporting types and quantities of waste and the route followed by these. A strict management record shall be maintained by monthly completion of the waste management papers, per types of identified waste- per HG 856/2002 (Government Decisions) on waste management record keeping, a strict record of the waste management will be kept by monthly filling of waste management data sheets, by type of identified waste, according to the model set out in Appendix 5 of this enactment;	WMP	ER C/T	C	Permanent	WM 006
LWCMP - 0023	Site organization	Waste Management Principles	For the reduction of the volume of waste required to be stored and transported the sites management will be equipped with metal can and plastic container (PET) presses, paper shredders;	EMP	ER C/T	C	Periodical	WM 007

LWCMP - 0024	All	Waste Management Principles	Waste, excavation or any material is not to be spilled/disposed/abandoned of in forest areas.	WMP	ER – C/T, SS C/T, TS C/T	C	Periodical	WM 008
LWCMP - 0025	All	Waste Storage	Waste will not be stored in the proximity of watercourses or protected areas;	WMP	ER C/T	C	Permanent	WM 009
LWCMP - 026	All	Waste Storage	Both in the site establishment and corresponding stations will be established clearly defined areas designated for controlled and safe waste storage;	WMP	ER C/T	C	Permanent	WM 010
LWCMP - 0027	All	Waste Storage	Store all food and food waste securely to prevent supporting populations of opportunistic species (which could include non-native invasive fauna).	WMP	ER C/T + SS C/T	C	Permanent	WM 011
LWCMP - 0028	All	Waste Storage	The selective collection of waste, temporary storage and final evacuation under safety conditions, full recycling of recyclable waste, taking into consideration that the waste degrade the landscape on large areas	WMP	ER C/T	C	Periodical	WM 012
LWCMP - 0029	All	Waste Storage	The selective collection of the generated waste, temporary storage in special areas and delivery to the authorized operators for valorization/elimination	WMP	ER C/T	C	Permanent	WM 013
LWCMP - 0030	All	Waste Storage	The waste shall be collected selectively in containers and they shall be temporary deposited in specially arranged places	WMP	ER C/T	C	Permanent	WM 014

LWCMP - 0031	All	Waste Storage	Each category of hazardous waste will be stored separately, based on physical and chemical characteristics, and depending on compatibility and nature of extinguishing substances which may be used for each category in case of fire; Any containers used for the collection and storage of hazardous wastes must be compatible with the waste they contain and will be kept safe and sealed, properly marked and labelled or accompanied by specific documents according to the regulations on hazardous waste. Such containers shall be inspected periodically to ensure their tightness and that they are kept safe. Containers should not be stored on the roads, traffic, pedestrian or any point that could affect emergency exits;	WMP	ER C/T+HSSM C/T	C	Permanent	WM 015
LWCMP - 0032	All	Management of Non-Hazardous Waste	Inert waste from excavations will be recycled for covering the pipe or will be used for temporary road works, platforms, etc.	HMMP	ER C/T+TS C/T	C	Permanent	WM 016
LWCMP - 0033	All	Management of Non-Hazardous Waste	Any metallic waste will be stored in specially designated places, taking in account periodic recovery in specialized units based upon a contract;		ER C/T	C	Permanent	WM 017
LWCMP - 0034	All	Waste Management Principles	Waste management will be done in strict compliance with Law No 211/2011 on waste regime	WMP	ER C/T	C	Permanent	WM 018



LWCMP - 0035	All	Waste Storage	Waste storage in any water courses is prohibited	WMP	ER C/T+TS C/T	C	Permanent	WM 019
LWCMP - 0036	All	Waste Management Principles	The transport / handling of waste generated and dangerous materials will be made in such a manner as not to cause pollution of soil, surface waters and groundwater	WMP	ER C/T+TS C/T	C	Allocated construction time	WM 020
LWCMP - 0037	All	Waste Management Principles	As regards the household and similar waste, special areas for temporary deposit shall be set and contracts shall be concluded with the waste management unit from the closest locality in order to eliminate these types of waste	WMP	ER C/T+TS C/T	C	Permanent	WM 021
LWCMP - 0038	According to tender documents	Management of Non-Hazardous Waste	Contractors, based on its plans for waste management, will provide transportation to approximately 115 000 tons of deployed rock to achieve the route of the pipeline (amount calculated by the designer), which will not be reused to strengthen and restructure the route of the pipeline, in areas authorized the estimated distances of 10-20 km maximum. The contractor will be required to dislodge and break rocks to size that allows the transport volume and quantity effectively and safely for the prevention of accidents respectively tumbles of rock or overturning vehicles.	HMMP	ER C/T+TS C/T+HSSM C/T	C/T	Permanent	WM 022
LWCMP - 0039	All	Management of Non-Hazardous Waste	Waste tyres will be collected separately from other wastes and will be turned into value by via licensed transporters in accordance with the regulation	WMP	ER C/T	C	Permanent	WM 023

LWCMP - 0040	All	Waste Management Principles	The management of the waste from the packages shall be accomplished according to the provisions of Law no. 249/2015	WMP	ER C/T	C	Permanent	WM 024
LWCMP - 0041	All	Waste Management Principles	Will not be removed or incineration of hazardous waste on site	WMP	ER C/T+SS C/T	C	Permanent	WM 025

Legend: ER-Environmental Responsible, TS-Technical Supervisor, SS-Site Supervisor, HHSE-Health, Safety, Security and Environmental Coordinator, T-TRANSGAZ, C-Contractor

## APPENDIX 2-MONITORING REQUIREMENTS

ID	MONITORING ACTIVITY	DESCRIPTION OF THE OBJECT OF THE MONITORING ACTIVITY	PARAMETERS	LOCATION	STANDARDS	PERIODICITY	KPI
1	Verification of compliance	Comply with all mitigation measures included in the Environmental Agreement	N/A	All Project	3/ EBRD	Permanent	LWCMP - 01
LWCMP - 0001	Registering and on site verification	For the pre-construction stage when work sites will be in place for each sector there will be a protocol that will establish as accurately as possible the environmental load, based on standardized forms (standard-forms), with aerial photographs or photographic images taken from the ground, which will act as control elements. For each site during the growing season (May-September) the ecological structure and functions of the site will be accurately determined.	Recorded situation /operative situation	All Project	4/Legal frame	Permanent	LWCMP 05 LWCMP 06
LWCMP – 0002	Workplace inspection	The equipment shall be brought to the site in perfect state of operation, the technical revisions and oil exchange being already made	Technical parameters	On-Site	4/Legal frame	Permanent	LWCMP 01 LWCMP 03 LWCMP 04 LWCMP 05 LWCMP 06
LWCMP – 0003	Information activities	Monitoring the meteorological bulletins meant to take the equipment outside the areas which could be flooded, in case of high waters	Statistics and estimation	On work place and accommodat	3/EBRD	Permanent	LWCMP 01 LWCMP

				ion place			04 LWCMP 05 LWCMP 06
LWCMP – 0004	Workplace and vicinity inspection	Prohibit all cutting of wood by workers.	N/A	On-site and work areas	3/EBRD	Permanent	LWCMP 05
LWCMP – 0005	Verification of the training's fulfillment	Educate workforce on preventing bush fires. Ensure bush fires are not used as a land clearance method	N/A	On site vicinity	3/EBRD	Periodically/ Weekly	LWCMP 05
LWCMP – 0005	Worktime	Construction will only take place during daylight hours, if the activities are not continuous or execution time is not enough	Time measure	Work places	3,4/EBRD, Legal frame	Weekly	LWCMP 01 LWCMP 02 LWCMP 03 LWCMP 04 LWCMP 06
LWCMP – 0006	Verifying the implementation of the measures provided by the Plans	Implement measures to reduce the impact on socio-economic environment even before the start of works (setting deviation routes, installation of sound-deadening panels, demarcation and installation of Warning elements related to the area of the works, provision of alternative network of utilities, etc.)	N/A	All Project	1,3,4	Periodicaly	LWCMP 01 LWCMP 03 LWCMP 04 LWCMP 05 LWCMP

							06
LWCMP – 0007	Verifying the fulfillment of the instructions	Strictly prohibit fishing at watercourses (EXCEPT WHEN ALL LEGAL CONDITIONS ARE FULLFILLED).	N/A	Vecinity of work places	1,3	Permanent	LWCMP 05
LWCMP – 0008	Planning	Although BRHA’s work force is not meant to incorporate any workers outside of the ethic demographic already presented within the local communities within the pipeline sphere of influence, strict adherence to the Worker’s Code of Conduct that will be developed by Transgaz will aid in mitigating any unforeseen issues regarding community disturbance.	N/A	All Project	3	Permanent	LWCMP 02
LWCMP – 0009	Verifying the fulfillment of the instructions and periodical inspections	Implement and enforce hunting and fishing ban on the workforce.(EXCEPT WHEN ALL LEGAL CONDITIONS ARE FULLFILLED).	N/A	All Project	3	Periodical	LWCMP 01 LWCMP 05
LWCMP – 00010	Inspections	Prohibiting weapons/ hunting for Project personnel, including subcontractors, both on site and while travelling to and from Project work areas	N/A	All Project	3,4	Periodical	LWCMP 01 LWCMP 02 LWCMP 05

LWCMP – 00011	Training and surveillance	Minimise exploitation and destruction of resources present and associated secondary impacts	N/A	All Project	3,4	Permanent	LWCMP 02 LWCMP 05
LWCMP – 00012	Training and surveillance	Continual reinforcement of the Worker’s Code of Conduct for permanent staff, most specifically in areas influenced by staff of the 3 compressor stations	Test	All Project	3,4	Periodically/e ach quarter	LWCMP 02 LWCMP 05

LWCMP – 00013	Surveillance	<p>General construction hours will be in accordance with the guidance of the planning permission document (Condition 6). Limited to:</p> <ul style="list-style-type: none"> <li>between 07:30 and 17:30 Monday to Friday;</li> <li>between 07:30 and 13:30 Saturdays; and,</li> <li>no operations on Sundays and during bank/public holidays, as is possible. Not applicable for continuous operation or in period when is necessary to recuperate time schedule.</li> </ul> <p>Prior liaison with the Romanian Planning Authority regarding any requirements for out of hours work for Health and Safety, or emergency reasons;</p> <p>Appropriate complaint procedure to ensure complaints are logged, investigated and resolved; and,</p> <p>Control of noise introduced into site induction to ensure that all operators on site, including contractors, are working in such a way to minimise noise.</p>	N/A	All Project	3,4	Permanent	LWCMP 01 LWCMP 02 LWCMP 03 LWCMP 04 LWCMP 05 LWCMP 06
LWCMP – 00014	Surveillance	The acquisition of chemicals for which the supplier may provide the proof of their pre-registration with the European Chemicals Agency shall be pursued	N/A	Tender time/on site	3,4	Bidding period	LWCMP 01 LWCMP 05

LWCMP – 00015	Planning/Management/Surveillance	Contractors will draw up its own Waste Management plans based on selective collection of waste for recycling / recovery / disposal; These will cover the following 'good site practices' to reduce the risk of impacts arising from waste management activities: <ul style="list-style-type: none"> <li>• develop inventory of likely wastes;</li> <li>• identification of local waste management facilities;</li> <li>• waste minimisation principles;</li> <li>• maximise reuse/recycle opportunities;</li> <li>• waste segregation (liquid and solid/reusable and recyclable);</li> <li>• waste collection, storage and transfer;</li> <li>• specific disposal procedures for all waste streams identified including waste transfer notes if moved to a licensed offsite facility;</li> <li>• auditing and reporting procedures; and</li> <li>• measures to be taken after construction works are completed, so as to assure the disposal and turning into value of all waste from the construction sites, including the waste resulted from the removal of temporary structures.</li> </ul>	Legal queries	All Project	1,2,3,4	Permanent	LWCMP 01 LWCMP 03 LWCMP 04 LWCMP 05 LWCMP 06
LWCMP – 00016	Management/Surveillance	Hazardous waste or hazardous materials will be collected selectively at the site organization will be handed over authorized operators <b>There will be no incineration of hazardous waste on site.</b> Containers of hazardous waste will only be moved or transferred to the site by qualified personnel using appropriate equipment and vehicles	Legal queries	All Project	1,2,,3,4	Permanent	LWCMP 01 LWCMP 03 LWCMP 04 LWCMP 05



LWCMP – 00017	Training and assessment	Personnel involved in waste management will benefit from regular training, specific to each product and where relevant including general requirements for hazardous waste management	Test	On-site and out-site responsables	1,2,3	Periodically/each semestry	LWCMP 05 LWCMP 06
LWCMP – 00018	Periodical inspections	For each contract, the waste management solution will be assessed, and contracts with entities entrusted with these responsibilities for each type of waste separately will be elaborated. Operators will keep track of the waste.	Legal queries	All Project	1,2,3	Periodically	LWCMP 01 LWCMP 05
LWCMP – 00019	Periodical inspections	The proper waste management will be put in place.Particular attention will be directed to the household or those containing food scraps. Waste from the work fronts will be stored in bins provided with trash bags and will be removed daily to the site organization. At the site organization collection points will be arranged provided with containers for each type of waste. For household waste a metal container with a tightly fitted lid will be used	N/A	All Project	1,2,3	peridocally	LWCMP 01 LWCMP 05
LWCMP - 00020	Inspections on site and of registers	Contractors will reporting types and quantities of waste and the route followed by these. A strict management record shall be maintained by monthly completion of the waste management papers, per types of identified waste- per HG 856/2002 (Government Decisions) on waste management record	Legal queries	All Project	1,2,3	Permanent	LWCMP 01 LWCMP 05

		keeping, a strict record of the waste management will be kept by monthly filling of waste management data sheets, by type of identified waste, according to the model set out in Appendix 5 of this enactment;					
LWCMP - 00021	On site surveillance	For the reduction of the volume of waste required to be stored and transported the sites management will be equipped with metal can and plastic container (PET) presses, paper shredders;	N/A	All project	1,2,3	Permanent	LWCMP 05
LWCMP - 00022	Surveillance	Waste, excavation or any material is not to be spilled/disposed/abandoned of in forest areas.	N/A	Forest areas	1,2	Permanent	LWCMP 02 LWCMP 05
LWCMP - 00023	Inspections	Waste will not be stored in the proximity of watercourses or protected areas;	N/A	Watercourse s area	1,2	Periodical	LWCMP 02 LWCMP 05
LWCMP - 00023	Inspections	Both in the site establishment and corresponding stations will be established clearly defined areas designated for controlled and safe waste storage;	Legal queries	Site area	1,2	Periodical	LWCMP 04 LWCMP 05
LWCMP - 00024	Surveillance	Store all food and food waste securely to prevent supporting populations of opportunistic species (which could include non-native invasive fauna).	Legal queries	Site area	1,2	Permanent	LWCMP 02 LWCMP 05
LWCMP - 00025	Surveillance	The selective collection of waste, temporary storage and final evacuation under safety conditions, full recycling of recyclable waste, taking into consideration that the waste degrade the landscape on large areas	Legal queries	All Project	1,2,3	Permanent	LWCMP 02 LWCMP 05

LWCMP - 00026	Surveillance	The selective collection of the generated waste, temporary storage in special areas and delivery to the authorized operators for valorization/elimination	Legal queries	All Project	1,2,3	Permanent	LWCMP 05
LWCMP - 00027	Inspection	The waste shall be collected selectively in containers and they shall be temporary deposited in specially arranged places	Legal queries	All project	1,2,3	Periodical	LWCMP 05
LWCMP – 00028	Surveillance	Each category of hazardous waste will be stored separately, based on physical and chemical characteristics, and depending on compatibility and nature of extinguishing substances which may be used for each category in case of fire; Any containers used for the collection and storage of hazardous wastes must be compatible with the waste they contain and will be kept safe and sealed, properly marked and labelled or accompanied by specific documents according to the regulations on hazardous waste. Such containers shall be inspected periodically to ensure their tightness and that they are kept safe. Containers should not be stored on the roads, traffic, pedestrian or any point that could affect emergency exits;	Legal queries	All Project	1,2,3,4	Permanent	LWCMP 02 LWCMP 05
LWCMP - 00029	Surveillance	Inert waste from excavations will be recycled for covering the pipe or will be used for temporary road works, platforms, etc.	N/A	Sites and pipeline route	3	Permanent	LWCMP 05

LWCMP - 00030	Workplaces inspection	Any metallic waste will be stored in specially designated places, taking in account periodic recovery in specialized units based upon a contract;	N/A	Sites and pipeline route	3,4	Permanent	LWCMP 05
LWCMP - 00031	Surveillance	Waste management will be done in strict compliance with Law No 211/2011 on waste regime	Legal queries	All Project	1,2,	Permanent	LWCMP 04 LWCMP 05
LWCMP - 00032	Surveillance	Waste storage in any water courses is prohibited	N/A	Watercourse s proximity	1,2,3	Permanent	LWCMP 04 LWCMP 05
LWCMP - 00033	Surveillance	The transport / handling of waste generated and dangerous materials will be made in such a manner as not to cause pollution of soil, surface waters and groundwater	Legal queries	All Project	1,2,3	Permanent	LWCMP 04 LWCMP 05
LWCMP 00034	Surveillance	As regards the household and similar waste, special areas for temporary deposit shall be set and contracts shall be concluded with the waste management unit from the closest locality in order to eliminate these types of waste	N/A	Site area	1,2	Permanent	LWCMP 04 LWCMP 05
LWCMP - 00035	Surveillance	Contractors, based on its plans for waste management, will provide transportation to approximately 115 000 tons of deployed rock to achieve the route of the pipeline (amount calculated by the designer), which will not be reused to strengthen and restructure the route of the pipeline, in areas authorized the estimated distances of 10-20 km maximum. The contractor will be required to dislodge and	N/A	Lot 2	1,4	Allocated construction time	LWCMP 01 LWCMP 02 LWCMP 05

		break rocks to size that allows the transport volume and quantity effectively and safely for the prevention of accidents respectively tumbles of rock or overturning vehicles.					
LWCMP - 00036	Surveillance	Waste tyres will be collected separately from other wastes and will be turned into value by via licensed transporters in accordance with the regulation	N/A	All vehicles tyres	1,2	Permanent	LWCMP 05 LWCMP 06
LWCMP - 00037	Surveillance	The management of the waste from the packages shall be accomplished according to the provisions of Law no. 249/2015	N/A	All Project	1,2,,4	Permanent	LWCMP 02 LWCMP 04 LWCMP 05
LWCMP - 00038	Surveillance	Will not be removed or incineration of hazardous waste on site	Legal queries	On-site area	1,2,3,4	Permanent	LWCMP 01 LWCMP 03 WAMO 04 LWCMP 05

### APPENDIX 3-RELEVANT LEGISLATION

- Integrated Management Manual on Quality-Environment-Health and Occupational Safety-Code: MSMI-CMSSO Ed.03/Rev.0
- CSR Transgaz policies;
- Others requirements provided on bidding documentation;
- Law no.319/14.07.2006 for Security and Safety on Labour-published on O.J. 646/26.07.2006. The Law transpose EU Directive no.89/391/CEE published on JOCE no. L183/1989;
- Law 53/2003-Labour Code;
- Law 286/2009-Criminal Code;
- Law no. 249/2015;
- Law No 211/2011 on waste regime;
- G.D no 1425/11.10.2006 Methodological norms for Law 319/2006.
- G.D. no 300/ 2006 security and safety regulations for temporary and mobile sites;

- GD nO.1091/16.08 2006, regarding health and safety conditions for work places.The Decision transpose Directive no 1989/654/CEE, published on JOCE no. L 393/1989.
- GD no.1048/9.08 2006, regarding the use of protection equipments by workers on work places. The Decision transpose Directive 89/656/CEE, published on JOCE no.L393/1989.
- GD Or. 493/ 12.04 2006, regarding working conditions under noise risk. The Decision transposing Directive 2003/10/CE, published on JOCE no. L 42/2003.
- GD. no. 1.876/ 22.12 2005, regarding working conditions under vibrations risk. The Decision transposing Directive 2002/44/CE published on JOCE no. L 177/2002