

APPENDIX 3

Template of ESMP (Environmental and Social Management Plan)

to the Environmental and Social Management Framework (ESMF) – Climate Resilience in Water Resources Management Project

This general ESMP template consolidates the typical environmental and social risks and impacts of Project Components 1–3 (see Annex No. 3 – Project Environmental Impact Assessment) and specifies for them: risk classification in accordance with the World Bank’s ESS, standard mitigation measures in accordance with the mitigation hierarchy (avoidance → minimization → restoration → offset with offsetting applied only where the preceding steps have been exhausted), implementation phase, responsibility for implementation and supervision, and monitoring indicators.

This ESMP template sets out the standard mitigation measures that are obligatory for a Task irrespective of whether a dedicated ESIA is prepared for it. The studies referenced in individual rows below (e.g. habitat assessment, hydrobiological survey, cultural heritage assessment) shall be conducted for every Task to which the relevant row applies, at a level of detail proportionate to the Task's risk classification under Section 5.2–5.3. Where a dedicated ESIA is additionally required under Table 13, its findings shall inform and, where necessary, expand upon the measures set out in this ESMP; the ESIA does not replace or condition the obligations established here.

The standard mitigation measures in this ESMP template apply to a Task irrespective of its risk classification. Depending on the Task's risk classification and the conditions set out in Table 13, a dedicated ESIA and additional instruments (BMP/CHMP/EPP/LARAP/LMP) may also be required; these supplement, and do not replace, the measures set out in this ESMP. Where the requirements of this ESMP are more stringent than applicable national law, the requirements of this ESMP shall prevail. The costs of implementing the measures must be included in construction contracts.

Where a Task involves associated facilities identified under Part C8 of the preliminary screening form, the risks and impacts of those facilities shall be assessed and mitigated using the same principles set out in this ESMP.

Risk Classification Legend (in accordance with the Bank's ESS, consistent with the significance criteria)

Risk Classification Legend (in accordance with the Bank's ESS)

Low	Minimal or no adverse environmental or social risks and impacts. Requires no additional measures beyond standard practices.
Moderate	Impacts are predictable, reversible, and limited in scope and duration to the construction phase; fully managed by the measures contained in this ESMP and the C-ESMP.
Substantial	Impacts that can be controlled using the established mitigation hierarchy and standard management plans (BMP/CHMP/operational plans); may require dedicated studies (e.g., nature surveys) and specialized monitoring.
High	Impacts that are potentially significant, irreversible, or related to critical habitats ,physical/economic displacement, cumulative or transboundary impacts, or a high probability of serious adverse effects on human health or the environment A dedicated ESIA is required, together with the additional instruments (BMP/CHMP/EPP/LARAP) indicated in the relevant rows below, which supplement the standard measures in this ESMP.

No.	Potential Risks and Impacts (ESS)	Risk Classification	Proposed Mitigation Measures	Phase	Responsibility	Monitoring Indicators
1	Land acquisition and change in land use for flood control/drought mitigation structures (levees, weirs, dams, polders) — ESS1, ESS3 (potentially ESS5)	Moderate–Substantial. If significant land acquisition is necessary → dedicated ESIA + LARAP.	- Optimize the layout and land use of the planned structures as early as the design phase to avoid or minimize permanent land acquisition. - If land acquisition or land-use restrictions are unavoidable, prepare and implement a dedicated LARAP in accordance with the Project's LARF. - Remove and store the topsoil layer for use in site reclamation; limit construction work to the minimum necessary area.	Planning, Construction	Implementation: PIU – design, LARAP, administrative decisions; Oversight: PCU Supervision/Support: Contractor – minimizing land occupation; Contract Engineer – verifying compliance with the design	- Area of land occupied/alterd (ha) relative to the planned land occupation. - Documentation of LARAP implementation and compensation payments. - GRM register.
2	Soil degradation and erosion during earthworks — ESS3	Moderate	- Planning earthworks outside periods of heavy rainfall where possible. - Use of erosion control measures (fences, mulching, temporary vegetation, slope stabilization). - Immediate soil reclamation and restoration of vegetation cover upon completion of work on a given section. - Limit vehicle and machinery traffic to designated access roads.	Construction	Implementation: Contractor— under the C-ESMP Supervision/Support: Contract Engineer – inspection and acceptance of restoration works; PIU – oversight	- Field inspection reports and checklists for erosion control measures. - Area of rehabilitated land (m²) relative to the disturbed area.

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No.	Potential Risks and Impacts (ESS)	Risk Classification	Proposed Mitigation Measures	Phase	Responsibility	Monitoring Indicators
3	Impact on surface water quality during construction — ESS3	Moderate–Substantial	- Use of cofferdams, sediment barriers, or isolation/diversion techniques. - Limiting the duration and scheduling of work in the riverbed to periods outside key biological cycles. - Prohibition on discharging untreated construction/stormwater into watercourses. - Monitoring water quality upstream and downstream of the work site.	Construction	Implementation: Contractor—implementation of measures, ongoing monitoring (C-ESMP) Supervision/Support: Contract Engineer – verification of monitoring results and compliance with the environmental decision; PIU – oversight	- Water quality monitoring reports (turbidity, total suspended solids, pH) relative to baseline values. - Record of non-compliance incidents and implemented corrective measures (see Appendix 4).
4	Disturbance of the river channel, hydromorphology, and sediment transport — ESS3, ESS6	Substantial	- Preparation of a hydrotechnical work plan under the C-ESMP, applying the mitigation hierarchy (avoidance as first priority). - Use of temporary bypass/side channels or isolation techniques. - Restoration of channel morphology and bank profile upon completion of the work.	Construction	Implementation: Contractor—execution of the hydrotechnical work plan Supervision/Support: Contract Engineer and environmental supervision—verification of compliance with the mitigation hierarchy; PIU – oversight	- Documentation of the implementation of the hydrotechnical work plan. - Surveys of the condition of the river channel and banks before and after completion of the works.
5	Risk of damage or disruption of construction works on embankments, weirs, and spillway structures due to flooding during construction — ESS4	Substantial	- Preparation of a Flood Risk Management Plan for the construction period as part of the C-ESMP. - Scheduling critical work outside the high-water season where possible. - Continuous hydrological and meteorological monitoring, including an early warning protocol for construction personnel.	Construction	Implementation: Contractor—development and implementation of the plan, monitoring Supervision/Support: Contract Engineer – approval of the plan and oversight of emergency procedures; PIU – oversight	Flood Risk Management Plan and documentation of its implementation. Hydrological and meteorological monitoring records; reports on incidents and "near-miss" situations (see Appendix 4).
6	Dam safety—risk of failure or damage to impoundment structures with potential consequences for	Substantial. For structures with a high safety risk potential, the classification may be upgraded to High	Classification of structures in terms of dam safety (head, storage capacity, hazard potential), based on the ESIA where required, or a proportionate dam safety assessment where not.	Construction, Operation	Implementation: PIU—classification, appointment of the Independent Panel of Experts / IDSPoE, EPP; Oversight: PCU, in accordance with the ESCP	- Dam safety classification report; - reports and no-objection letters from the Independent Panel of Experts / IDSPoE.

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No.	Potential Risks and Impacts (ESS)	Risk Classification	Proposed Mitigation Measures	Phase	Responsibility	Monitoring Indicators
	downstream communities, infrastructure, and sensitive receptors (construction and operation phases) — ESS4	→ Independent Panel of Experts (IDSPoE) and EPP required as standalone documents, in accordance with the ESCP.	- If technical parameters so require—appointment of an Independent Panel of Experts / IDSPoE to evaluate studies, Technical Design, construction, and commissioning. - Preparation and updating of the Emergency Preparedness Plan (EPP). - Conducting periodic mock drills - Conducting periodic safety inspections during the operational phase and implementing corrective actions in the event of detected irregularities.		Supervision/Support: Contractor – implementation during construction; Operator/facility manager – periodic inspections during operation	- EPP document and records of drills/tests. - Periodic safety inspection reports.
7	Changes in groundwater levels — ESS3	Substantial	Establishment of a groundwater monitoring program (piezometer network) before, during, and after construction. Use of controlled/phased dewatering to limit cone of depression. Assess potential impact on drinking water intakes and, if necessary, rehabilitate or relocate intake infrastructure before the reservoir is filled.	Construction, Operation	Implementation: Contractor—monitoring and dewatering during construction Supervision/Support: PIU – assessment of impacts on water intakes and decisions regarding infrastructure restoration; Operator – monitoring during operation	- Groundwater monitoring reports (piezometer readings) relative to baseline conditions. - Register of water intakes affected and of completed restoration/relocation works.
8	Impact of construction work on aquatic biota — ESS6	Substantial	- A hydrobiological/ichthyological survey shall be conducted for every Task to which this row applies, proportionate to the risk classification, in accordance with ESS6 (para. 11); - where a dedicated ESIA is required under Table 13, this survey shall be incorporated into it. - Apply the mitigation hierarchy: avoidance first, then minimization. - Prepare and implement a Biodiversity Management Plan (BMP) in the event of significant residual impacts. - Implement fish capture/relocation procedures from isolated or drained sections, if required.	Construction	Implementation: Contractor—execution of work in accordance with the BMP and biological schedule Supervision/Support: Environmental supervision (expert) – compliance monitoring; PIU – oversight	- Reports on BMP implementation; results of ecological surveys before and after construction completion. - Records of fish capture/relocation activities, if applicable.
9	Risk of disturbance to protected areas and habitats within Natura 2000 sites — ESS6	Substantial. If the impact may compromise the integrity of the site or affects a critical habitat →	A habitat assessment (Natura 2000 site) shall be conducted for every Task to which this row applies, proportionate to the risk classification, confirming the presence or absence of a significant impact on the integrity of the area, in accordance with ESS6 paras. 26–27;	Planning, Construction	Implementation: PIU – habitat assessment, derogation decisions, BMP Supervision/Support: Environmental supervision (expert) – field verification;	- Habitat assessment/ESIA and any derogation decisions. - Reports on the monitoring of BMP implementation.

No.	Potential Risks and Impacts (ESS)	Risk Classification	Proposed Mitigation Measures	Phase	Responsibility	Monitoring Indicators
		classification: High; dedicated ESIA/habitat assessment required, ESS6 para. 24 conditions must be met.	- where a dedicated ESIA is required under Table 13 Section 6.3 ESMF), this assessment shall be incorporated into it. - Application of the mitigation hierarchy (ESS6 paras. 9, 15). - Preparation of BMP with site-specific mitigation measures. - Obtaining derogation decisions from the RDOŚ or General Directorate for Environmental Protection (GDOŚ), if required. - Exclusion from funding of subprojects causing an unacceptable residual impact on critical habitats (ESS6, Section 18).		Contractor – implementation of mitigation measures	
10	Risk of disturbance to priority habitats and ecological connectivity — ESS6	Substantial. Priority habitats may qualify as natural or critical habitats within the meaning of ESS6 (paras. 21–24) – classification must always be verified against a current species inventory.	- A habitat inventory within the Area of Influence shall be conducted for every Task to which this row applies, proportionate to the risk classification, and habitats classified as modified/natural/critical in accordance with ESS6 (paras. 19–24); - where a dedicated ESIA is required under Table 13, S. 6.3. ESMF, this inventory shall be incorporated into it. - Apply the mitigation hierarchy: avoid encroachment on priority habitats first, then minimize. Preparation of BMP; where losses cannot be avoided, implement compensatory planting/restoration ("like-for-like or better", "no net loss/net gain", ESS6 para. 16). - Where a structure may restrict migration of fish or other organisms, assess and, if possible, design fish passages.	Planning, Construction	Implementation: PIU – habitat classification, compensation decisions Supervision/Support: Environmental supervision (expert)—inventory and monitoring; Contractor—implementation of plantings/fish passages	- Reports on habitat surveys/mapping; documentation of compensatory measures. - Surveys of habitat conditions after construction completion; monitoring of fish passage effectiveness.
11	Disturbance and disruption of fauna (birds, bats) during breeding seasons — ESS6	Moderate–Substantial. If the survey confirms presence of a breeding site/colony of an IUCN Red List species, an endemic species, or a species with a limited range, the habitat must be assessed against	- Conduct an ornithological and chiropterological survey prior to the start of work, covering biologically significant periods (ESS6 GN 12.3). - Schedule work outside breeding/hibernation periods of sensitive species and include the schedule in the BMP. - Obtain derogation decisions for specific species, if required. - Environmental monitoring by a qualified expert during sensitive periods.	Construction	Implementation: Environmental supervision (ornithologist/chiropterologist) – inventory and monitoring Supervision/support: PIU – derogation decisions; Contractor – work schedule in accordance with the BMP	- Survey reports and derogation decisions. - Reports from nature supervision site visits.

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		critical habitat criteria (ESS6, para. 23).				
12	Risk of introducing or spreading invasive alien species (IAS) — ESS6	Moderate	• Use only certified planting/seeding material free of IAS (ESS6, para. 29). • Cleaning of machinery and equipment before moving between construction sites. • Monitor for IAS during and after work and remove immediately if detected. • Provide for IAS prevention measures in the Invasive Alien Species Management Plan (IASMP)	Construction	Implementation: Contractor—cleaning of equipment, monitoring, and removal of IAS Supervision/Support: Environmental supervision—verification; Contract Engineer – compliance review with the C-ESMP; PIU – oversight	• Equipment cleaning records. • Reports on IAS monitoring and removal.
13	Control of invasive alien species (IAS) — ESS3, ESS6	Moderate	• Mechanical or manual methods shall be applied as the first choice; chemical agents shall be used only as a last resort, in accordance with the IASMP) approach. • A detailed control protocol shall be developed as part of the Biodiversity Management Plan (BMP) for the relevant Task.	Construction	Implementation: Contractor—cleaning of equipment, monitoring, and removal of IAS Supervision/Support: Environmental supervision—verification; Contract Engineer – compliance review with the C-ESMP; PIU – oversight	• Report on monitoring of IAS control effectiveness.
14	Noise emissions from equipment and construction work — ESS3	Moderate	• Limit noise-generating activities to permitted hours; • schedule high-noise-potential work in consultation with the local community. Use of noise-reduction measures. • Monitoring of noise levels near sensitive receptors during periods of peak work activity.	Construction	Implementation: Contractor—implementation of measures and monitoring Supervision/Support: Contract Engineer – compliance monitoring; management of the GRM; PIU – oversight	• Reports on noise monitoring at sensitive locations. • Register of grievances and requests regarding noise.
15	Dust and pollutant emissions from construction equipment — ESS3, ESS4	Moderate	• Use of dust-suppression measures on exposed ground surfaces, stockpiles, and unpaved roads. • Maintenance of vehicles and equipment per manufacturer's recommendations. • Covering vehicles transporting materials; • prohibition of open burning of waste on-site.	Construction	Implementation: Contractor—implementation of measures Supervision/Support: Contract Engineer – inspection and technical reviews of equipment; PIU – oversight	• Dust monitoring/air quality logs. • Equipment technical inspection logs; • GRM Register.

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No.	Potential Risks and Impacts (ESS)	Risk Classification	Proposed Mitigation Measures	Phase	Responsibility	Monitoring Indicators
16	Generation and management of construction waste and hazardous waste — ESS3	Moderate	- Preparation of a waste management plan as part of the C-ESMP, including segregation of hazardous waste - Storage of hazardous waste in labeled containers with secondary containment, away from watercourses. - Reuse of suitable excavated material on-site where possible; disposal of remaining waste at licensed facilities. - Fuels and chemicals shall be stored, handled and transported in accordance with good international industry practice, away from watercourses and other sensitive receptors, as part of the C-ESMP. - A Spill Prevention and Response Plan shall be prepared and implemented as part of the C-ESMP (see Appendix 4).	Construction	Implementation: Contractor— waste management under the C-ESMP Supervision/Support: Contract Engineer – inspection of waste storage areas and waste transfer records; PIU – oversight	- Records of waste generation and disposal. - Records of inspections of waste storage sites.
17	Environmental impacts from sourcing of soil and other construction materials from borrow areas — ESS3	Moderate	- Excess excavated material from Project earthworks shall first be assessed for reuse as fill material within the Task, to reduce the need for externally sourced material. - Where external material is required, it shall be sourced from existing, licensed suppliers. - Where a dedicated borrow area is unavoidable, its location shall avoid sensitive receptors, in accordance with the mitigation hierarchy. - Borrow areas shall be rehabilitated upon completion of use, in accordance with the C-ESMP.	Construction	Implementation: Contractor— C-ESMP Supervision/Support: Contract Engineer – compliance monitoring; PIU – oversight	- Records confirming the assessment and reuse of excavated material within the Task. - Records confirming the source of any externally sourced material (licensed supplier or Task-specific borrow area, including siting assessment). - Records confirming rehabilitation of any borrow area used within the Task.
18	Traffic and community/road safety risks associated with construction — ESS4	Moderate–Substantial	- Preparation of a Traffic Management Plan as part of the C-ESMP, addressing routing through settlements, school zones, and tourist areas; - safe pedestrian and vehicle access during temporary diversions or closures; - coordination with emergency services; identification of material sourcing sites and assessment of associated risks; - fencing, lighting, signage, and traffic marshals at excavations or hazardous areas;	Construction	Implementation: Contractor— Traffic Management Plan, C-ESMP Supervision/Support: Contract Engineer – compliance monitoring; PIU – coordination with local authorities and emergency services	- Traffic Management Plan and documentation of its implementation. - Records of community complaints related to traffic/road safety (GRM register). - Pre-construction condition survey reports.

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No.	Potential Risks and Impacts (ESS)	Risk Classification	Proposed Mitigation Measures	Phase	Responsibility	Monitoring Indicators
			and a pre-construction condition survey of nearby buildings, wells, utilities, or cultural property at risk from blasting, piling, or vibration.			
19	Risk of discovering previously unknown archaeological sites or cultural heritage during earthworks — ESS8	Moderate	- Inclusion of the Chance Finds Procedure in the C-ESMP and in tender documents/contracts with the contractor. - Ensure archaeological supervision of earthworks in areas with archaeological potential. - Suspend work at the site of the find, secure the area, and report the discovery to the appropriate conservation officer or authorities.	Construction	Implementation: Contractor—suspend work and report Supervision/Support: Archaeological supervision (expert)—assessment of the find; PIU—report to the conservation officer	- Reports on chance finds and documentation of notifications to the conservation officer. - Archaeological supervision reports.
20	Risk of impact on known cultural or religious sites (cemeteries, shrines, places of worship) — ESS8	Moderate	- Known sites shall be identified prior to construction and subject to prior assessment, consultation with relevant communities and authorities, and avoidance or management measures; - distinct from, and in addition to, the Chance Finds Procedure, which applies only to previously unidentified discoveries.	Planning, Construction	Implementation: PIU – identification, consultation, Contractor – avoidance/management measures during construction	- Documentation of identified sites and consultation records. - Records of avoidance/management measures implemented.
21	Risk of damage to historic structures or cultural assets — ESS8	Moderate	- An assessment of the impact on cultural heritage shall be conducted for every Task to which this row applies, proportionate to the risk classification; - where a dedicated ESIA is required under Table 13 s. 6. 3 of ESMF, this assessment shall be incorporated into it. - Prepare and implement a Cultural Heritage Management Plan (CHMP). Obtain approval from the relevant conservation authority before commencing work on or near protected sites; - use non-invasive installation/construction methods wherever possible.	Construction	Implementation: PIU – CHMP, obtaining approval from the conservation officer Supervision/support: Contractor – implementation of non-invasive construction methods	- CHMP and conservation approvals/decisions. - Surveys of the condition of cultural heritage sites before and after completion of work.
22	Landscape changes associated with embankments, spillway structures, and reservoir/polder filling — ESS6, ESS8	Substantial	- An assessment of the impact on landscape and scenic values shall be conducted for every Task to which this row applies, proportionate to the risk classification; - where a dedicated ESIA is required under Table 13, S. 6.3. of ESMF, this assessment shall be incorporated into it.	Planning, Construction, Operation	Implementation: PIU – public consultations, CHMP if applicable Supervision/support: Operator – incorporation of findings into operating procedures	- Documentation of the assessment of the impact on the landscape/views. - Records of public consultations regarding landscape solutions,

No.	Potential Risks and Impacts (ESS)	Risk Classification	Proposed Mitigation Measures	Phase	Responsibility	Monitoring Indicators
			- Adapting the construction design to the character of the surrounding landscape, where possible. - Prepare a CHMP if cultural landscape values are affected; - consult with the local community regarding landscape solutions.			GRM register.
23	Permanent changes in river, morphology, and sediment transport (operation phase) — ESS3, ESS6	Substantial	- Development and implementation of reservoir/structure operation guidelines regarding sediment management, taking into account adaptive management (ESS6 GN12.4). - Conduct periodic sediment removal/flushing if deposition affects the structure's operation or downstream morphology. - Monitoring of channel morphology and sediment deposition at specified intervals.	Operation	Implementation: Structure operator/manager – operation, monitoring Supervision/support: PIU – updating the operating guidelines as needed	- Documentation of the Reservoir/Structure Operation Guidelines. - Periodic reports on the monitoring of channel morphology and sediment deposition.
24	Insufficient Minimum Environmental Flow (MEF) during operation — ESS3, ESS6	Substantial	- Determine the MEF using a recognized hydrological method, for structures creating permanent impoundment or regulating baseline flow. - Where a dedicated ESIA is required, incorporate the MEF assessment into it. - Document the MEF in the Biodiversity Management Plan (BMP), including seasonal values and operating rules for low-flow conditions. - Reflect compliance with the MEF in the structure's operating manual.	Planning, Operation	Implementation: Structure operator/manager – operation, monitoring Supervision/support: PIU – identification, consultation, updating the operating guidelines as needed	- Reports on the monitoring of BMP implementation. - Records of actual downstream flow releases against the adopted MEF, and of any adaptive management actions triggered by non-compliance.
25	Greenhouse gas emissions and risks to water quality associated with reservoir operation — ESS3, ESS6	Substantial	- An assessment of risks related to GHG emissions and water quality shall be conducted, proportionate to the risk classification; - where a dedicated ESIA is required under Table 13 Ch. 6.3. of ESMF, this assessment shall be incorporated into it. - Develop reservoir operation guidelines to mitigate stratification risk. - Implementation of a water quality monitoring program during the operational phase, with particular attention to protection of drinking water sources, if applicable.	Operation	Implementation: Facility operator/manager – operation and monitoring Supervision/support: PIU – GHG risk assessment	- GHG and water quality monitoring reports. - Reservoir operation guidelines and documentation of their application.

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No.	Potential Risks and Impacts (ESS)	Risk Classification	Proposed Mitigation Measures	Phase	Responsibility	Monitoring Indicators
26	Changes in the ecosystem's regulating and retention functions during operation — ESS6	Substantial	- An assessment of changes in ecosystem services shall be conducted for every Task to which this row applies, proportionate to the risk classification, in accordance with ESS6 (para. 11c) and ESS1; - where a dedicated ESIA is required under Table 13 S.6.3. of ESMF, this assessment shall be incorporated into it. - Preparation of a BMP covering restoration measures and, where possible, nature-based solutions (NBS), in accordance with the "no net loss/net gain" principle. - Monitoring of key ecosystem function indicators during the operational phase.	Operation	Implementation: Facility operator/manager – monitoring during operation Supervision/support: PIU – BMP	- Reports on the monitoring of BMP implementation. - Records of monitoring of ecosystem function indicators.
27	Risks specific to NBS design and implementation — species selection, hydrological effects, and invasive species colonization — ESS6	Moderate	- Species used in NBS shall be selected to match local populations and site-specific habitat conditions. - A hydrological assessment shall be conducted prior to implementation to avoid unintended changes in water flow, groundwater levels, or retention patterns. - Post-restoration monitoring shall include surveillance for invasive alien species, with removal in accordance with the IASMP if detected. - Adaptive management measures shall be implemented where monitoring identifies poor establishment, unintended hydrological effects, or invasive species colonization.	Construction, Operation	Implementation: Contractor— initial establishment; Operator/facility manager – post-handover monitoring Supervision/support: PIU – oversight	- Survival/establishment rates of planted species relative to targets. - Records of post-restoration IAS surveillance and corrective actions taken.
28	Involuntary resettlement, physical/economic displacement or restrictions on land use — ESS5	Substantial. In the case of Involuntary resettlement, physical/economic displacement or significant scale of impact → classification as "High," requiring dedicated ESIA + standalone LARAP.	- Avoid physical and economic displacement or, if unavoidable, minimize it by analyzing alternative project designs. - If involuntary displacement is unavoidable on any scale— prepare, implement, and monitor a dedicated LARAP in accordance with the Project's LARF. - Conduct consultations with affected persons and maintain an accessible GRM.	Planning, Construction	Implementation: PIU – LARAP, consultations, compensation payment Supervision/Support: Contractor – alignment of the construction schedule with resettlement deadlines	- Documentation of LARAP implementation and monitoring. - Records of consultations and the GRM.

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No.	Potential Risks and Impacts (ESS)	Risk Classification	Proposed Mitigation Measures	Phase	Responsibility	Monitoring Indicators
29	Occupational health and safety risks to Project workers, contractors, and subcontractors — ESS2	Moderate–Substantial	- Implementation of a Labor Management Plan (LMP) and site-specific OHS Management Plan, including hazard identification, hierarchy of preventive measures, and emergency response procedures. - Provision of PPE, training, and medical examinations at the employer's expense. - Application of the Contractor's Code of Conduct. - Establishment of a workers' Grievance Mechanism, operating independently of the Project-level GRM.	Construction	Implementation: Contractor—LMP, OHS Management Plan, Code of Conduct Supervision/Support: Contract Engineer – verification; PIU – oversight	- OHS incident and accident records (see Appendix 4). - Training documentation. - Records of the workers' grievance mechanism.
30	Impact of Associated Facilities — cross-cutting, relevant ESS as applicable	To be determined based on the nature of the facility and identified risks (Part C8 of the preliminary screening form)	- Associated facilities shall be identified and their environmental and social risks and impacts assessed and mitigated using the same principles set out in this ESMP. - Where not yet identified at screening, this shall be stated explicitly and reassessed once the facilities are defined.	Planning, Construction	Implementation: PIU / Contractor, as relevant to the facility Supervision/Support: Contract Engineer	Documentation of associated facility identification and risk assessment.
31	Positive impacts: increased protection against floods/droughts, catchment area water retention, groundwater recharge, and ecological connectivity — ESS3, ESS4, ESS6	Low (positive impact)	- No need for mitigation measures; - use of adaptive management to maximize benefits. - Reporting of benefits achieved as part of routine environmental and social monitoring.	Operation	Implementation: Operator/facility manager – monitoring of benefits Supervision/support: PIU – reporting to the Bank	- Monitoring of hydrological effectiveness (level of flood protection/flood risk management, retention volume). - Indicators of benefits for ecosystem services.

Legend / Abbreviations

Term	Definition
C-ESMP	Contractor Environmental and Social Management Plan
BMP	Biodiversity Management Plan – in accordance with Annex A of the ESS6 Guide
CHMP	Cultural Heritage Management Plan
EPP	Emergency Preparedness Plan for dam safety
ESIA	Environmental and Social Impact Assessment
LARAP	Land Acquisition and Resettlement Action Plan
LARF	Land Acquisition and Resettlement Framework
SEP	Stakeholder Engagement Plan
PIU	Project Implementation Unit
PCU	Project Coordination Unit
IDSPoE	Independent Dam Safety Panel of Experts
ESCP	Environmental and Social Commitment Plan
RDOŚ / GDOŚ	Regional / General Directorate for Environmental Protection
NBS	Nature-Based Solutions
Chance Finds Procedure	Procedure for managing previously unidentified archaeological or cultural heritage discoveries during earthworks
NNL / NG	No Net Loss / Net Gain of Biodiversity – ESS6, paragraphs 15–16