Anaklia
Development Consortium

Anaklia Deep Sea Port Development

ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM

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Environmental and Social Policy

"The Anaklia Development Consortium (ADC) is committed to operate all of its facilities and perform all its services and activities in an environmentally and socially sound and responsible manner.

In order to achieve this vision, ADC's management is committed to:

- *ensure compliance with applicable law and regulation requirements, as well as national and international standards and good international industry practice (GIIP);*
- *ensure that environmental and social considerations are included in business (including procurement and supply chain), financial, operational, and planning decisions and management of assets (sustainability principles). Feasible and practicable options should be considered in line with applicable regulation, standards and industry practice;*
- *incorporate pollution prevention practices into its procedures and processes, and maintain a high level of preparedness;*
- *proactively avoid, reduce and minimise the impact of its activities and services on the environment through continuous improvement of its environmental and social performance indicators;*
- *demonstrate its commitment to determine and reduce its carbon footprint and work toward a carbon neutral port;*
- *reduce waste disposal and promote waste reduction, reuse and recycling measures by the implementation of the waste hierarchy;*
- *implement appropriate environmental and social management and monitoring programs to assist in minimising environmental and social impacts from ADC services and activities;*
- *keep this E&S Policy up to date and make it available to all staff, contractors, port users and the general public;*
- *ensure that all staff, contractors and port users are appropriately trained and aware of their responsibilities to control their environmental and social impacts in order to comply with ADC's procedures and management plans;*
- *regularly engage with Government and local authorities, Non-Governmental Organisations, local communities and members of the public, and other interested parties (stakeholders) as defined in the Stakeholder Engagement Plan; and*
- *communicate externally about its environmental and social performance against targets through an annual Corporate Social Responsibility (CSR) report on ADC website.*

The E&S Policy covers the activities, services and office-based operations of ADC related to Anaklia Port Development Project. This Policy is a guide and establishes the environmental and social objectives and targets of ADC which will need to be continuously improved over time."

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Appendix D Terms of Reference and/or Guidance to develop Environmental and Social Management and Monitoring Plans.

List of Abbreviation

Abbreviation	Definition
ADC	Anaklia Development Consortium
AoI	Area of Influence
AtN	Aids to Navigation
BOMP	Biodiversity Offset Management Plan
CEMP	Construction Environmental Management Plan
CSR	Corporate Social Responsibility
CTO	Container Terminal Operator
EBRD	European Bank for Reconstruction and Development
EHS	Environmental, Health and Safety
EHSS	Environmental, Health, Safety and Social
EIA	Environmental Impact Assessment
ERP	Emergency Response Plan
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
ESAP	Environmental and Social Action Plan
ESMP	Environmental and Social Management Plan
ESMMP	Environmental and Social Mitigation and Monitoring Plan
ESMS	Environmental and Social Management System
GIIP	Good International Industry Practice
GM	Grievance Mechanism
GoG	Government of Georgia
MMMP	Marine Mammal Mitigation Plan
PDCA	Plan-Do-Check-Act
PIC	Public Information Centre
PR	Performance Requirement (EBRD)
SEP	Stakeholder Engagement Plan
SMART	Specific, Measurable, Attainable, Realistic and Timely
TEU	Twenty-foot Equivalent Unit
UXO	Unexploded Ordinance
WHO	World Health Organisation

1. Introduction

1.1 Presentation of the Environmental and Social Management System

This Manual presents the Environmental and Social Policy and the Environmental and Social Management System (ESMS) for the Anaklia Development Consortium's (ADC) activities during Phase 1 of the Anaklia Deep Sea Port Development ("the Project"). The Project is located south of the village of Anaklia on the Black Sea coast of Georgia and described in **Section 4.2**.

The ESMS Manual forms part of ADC's overall management system and provide a tool to ADC's Environmental, Health and Safety (EHS) Team to develop and implement its Environmental and Social (E&S) Policy and manage its environmental aspects.

The ESMS also provide specific guidance, procedures and work instructions to be implemented by ADC employees and its contractors to comply with ISO 14001:2015 standard and applicable legal requirements.

1.2 Purpose of the ESMS

This Manual demonstrates how ADC intends to deliver the Project's environmental, health and safety, and social (EHSS) legal compliance and other requirements and E&S commitments.

The ESMS provides guidance and direction for the implementation and operation of the ESMS to all employees of ADC, particularly those concerned with ESMS related activities.

The ESMS also identifies a set of interrelated elements (organisational structure, planning activities, responsibilities, practices, procedures, and resources) used to establish and achieve the environmental performance objectives of the Project.

1.3 Scope of the ESMS

The ESMS applies to the construction and operation activities conducted by ADC and its contractors during Phase 1 of the Anaklia Deep Sea Port Development. The ESMS also takes into account associated facilities necessary for the proposed development.

The location and areas covered in the ESMS include the Phase 1 development footprint and the Project area of influence during construction and operation.

Section 3 of the Manual provides more detail of the Project location and activities.

1.4 Content of this Document

This Manual is divided into the following sections:

- **Section 2:** Terms and Definitions;
- **Section 3:** ADC Environmental and Social Policy;
- **Section 4:** The Anaklia Port Development Project;
- **Section 5:** Environmental and Social Management System Requirements;
- **Section 6:** Implementation and Operation of the ESMS;

- **Section 7:** Evaluating the Performance of the ESMS; and
- **Section 8:** Improvement.

A set of Appendices support the present ESMS Manual and contains:

- **Appendix A** Cross Reference to ISO 14001:2015 Requirements and Sections in the ESMS Manual and Environmental Procedures and Plans;
- **Appendix B** Controlled Document List;
- **Appendix C** Terms of Reference to develop Operational, Environmental and Social Management Procedures; and
- **Appendix D** Terms of Reference to develop Environmental and Social Management Plans.

1.5 Distribution, Revision and Version Control

The present ESMS Manual is considered as a live document that may be subject to revision over the course of the Project to reflect any changes in activities. The Manual will be reviewed and updated prior to commencement of operations, as further information becomes available.

If the present document is amended due to changes in scope of the Project, such amendments will be designed to take into account applicable Health, Safety, Environmental and Social Laws.

The ESMS Manual is a 'Controlled Document'. Controlled documents are managed by ADC in accordance with the procedure related to Control of Documented Information (**Appendix C**). Any changes to the document will require sign off by ADC's Environmental Health and Safety (EHS) department followed by re-issue of the document to all relevant parties.

2. Terms and Definitions

Table 2-1: Terms and Definitions	
Terms	**Definition**
Area of Influence	The geographical area likely to be affected by the Project (planned or unplanned) due to direct and indirect effects and impacts on the environment. It also includes activities related to associated facilities/development and cumulative impacts.
Associated facilities or development	Facilities that are not funded as part of the project and that would not have been constructed or expanded if the project did not exist and without which the project would not be viable.
Awareness	An understanding of the importance of conforming with the organisation's environmental and health & safety policies, ESMS requirements and all legal and other requirements.
Competence	Ability to apply knowledge and skills to achieve intended results.
Continual improvement	Recurring activity or process to enhance performance.
Corrective action	An action to eliminate the cause of a detected nonconformity or other undesirable situation.
Documented information	Information required to be controlled and maintained by an organisation and the medium in which it is contained.
Environmental aspect	Elements of an organisation's activities or products or services that interact or can interact with the environment (including social aspects).
Environmental impact	Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's environmental aspects.
ESMS	Part of an organisation's management system used to manage environmental and social aspects, fulfil compliance obligations, and address risks and opportunities.
Environmental objective	Objective set by an organisation consistent with its Environmental and Social Policy.
E&S performance	Measurable results of an organisation's management of its environmental aspects.
E&S Policy	Overall intentions and directions of an organisation related to its environmental performance as formally expressed by its top management.
Hazard	Source, situation, or act with a potential for harm in terms of human injury or ill health, or a combination thereof.
Interested party	Person, group or organisation that can affect, be affected by, or perceive itself to be affected by a decision or an activity.
Internal audit	Independent verification conducted internally to ensure that the organisation's risk management, governance and internal control processes are operating effectively against a set of criteria.
Management Plan	Document which describes mitigation and performance improvement measures and actions that address environmental and social risks and impacts of the Project.
Monitoring	Determining the status of a system, a process or an activity.
Nonconformity	Non-fulfilment of a requirement.
Objective	Result to be achieved.
Procedure	Specified way to carry out an activity or a process.
Project	Anaklia Deep Sea Port Development.
Risk	Combination of the likelihood of an occurrence of a hazardous event or exposure(s) and the severity of injury or ill health that can be caused by the event or exposure(s).
Target	Detailed performance requirement applicable to the organisation or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.

3. ADC Environmental and Social Policy

A draft Environmental and Social (E&S) Policy has been prepared for the overall Project and is presented in the front section (page ii) of this document.

The E&S Policy was approved by ADC's Top Management on 27th September 2017. This policy:

- Is appropriate to environmental and social impacts of ADC's activities and services and their nature and scale;
- Includes environmental and social commitments to comply with applicable legal requirements together with other requirements which are related to environmental and social aspects;
- Includes environmental and social commitments to continuous improvement (Plan-Do-Check-Act (PDCA)) and prevention of pollution;
- Is a framework to set environmental and social objectives and targets with continuously improvement;
- Is documented, implemented and maintained;
- Is shared and communicated with all staff for their awareness; and
- Is publicly available (via website or other appropriate tools).

The E&S Policy is currently under development by ADC and is therefore subject to amendments by ADC's management in line with their E&S objectives for the Project and specific aspects of the Anaklia Port Development Project.

4. The Anaklia Port Development Project

4.1 The Anaklia Development Consortium

ADC's aim is to develop and operate Anaklia Deep Sea Port. The development has been granted the rights to develop, finance, design, construct, operate, market, manage, and grow the Anaklia region through an investment agreement provided by the Ministry of Economy and Sustainable Development of Georgia.

The new port at Anaklia will be a lasting economic driver for Georgia, both as a national asset representing Georgia's historic significance and its vital role in the evolving global economy.

The members of ADC are **TBC Holding** (Georgia), an international entrepreneur and developer, and **Conti International** (USA), a developer and builder of capital asset projects. Other team members include **Moffatt & Nichol (M&N)**, an international maritime port facility planner and design innovator, **Maritime & Transport Business Solutions (MTBS)**, an international finance and transaction advisory firm, and **SSA Marine**, a terminal operator.

The structure of Anaklia Development is presented in **Figure 3-1**.

Figure 3-1: Anaklia Development Structure

4.2 Description of the Project

4.2.1 Project Location and Development

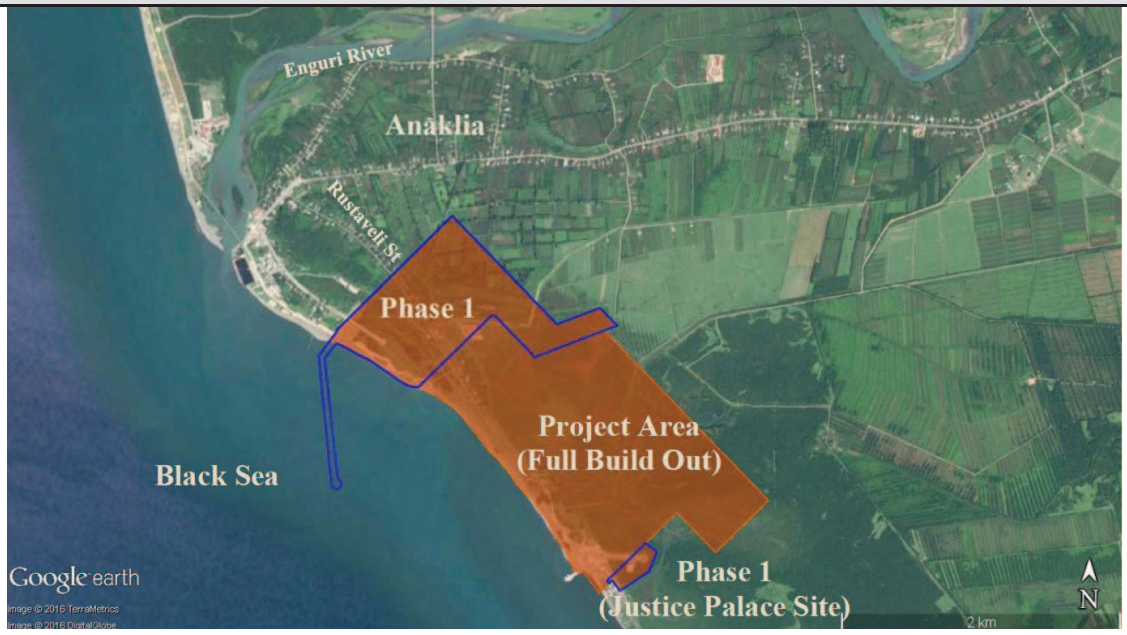
The Anaklia Deep Sea Port Draft Master Plan[1] identifies that the port will be developed in nine phases between 2017 and 2069:

- **Phase 1** (**Figure 4-2**) comprises port construction works and port operations of various marine and landside infrastructure and facilities to handle approximately 8 million tons of containerised cargo per annum; which equates to approximately 790,000 twenty-foot equivalent unit (TEU) containers.

- **Phases 2-9** will be developed across the investment area (see **Figure 4-2** below) after Phase 1. The subsequent port phases are to be developed from 2027 (Phase 2) to 2069 (Phase 9). On completion of Phase 9, the port will be able to handle over 100 million tons of containerised, dry bulk and liquid bulk cargoes through the provision of seven container berths and three dry bulk and/or liquid bulk berths.

The Project location is presented in **Figure 4-2**.

Figure 4-2: Project Location[2]



The present document covers the activities known at this stage i.e. Phase 1 of the Anaklia Deep Sea Port Development. Phase 1 will cover an area of approximately 130ha of land located within the northern part of the Investment Area, and approximately 224ha of the adjacent coastal water.

[1] MTBS (2017). Anaklia Deep Sea Port. Draft Master Plan. January, 2017.
[2] Moffatt and Nichol (2017). Anaklia Deep Water Port Phase 1. Preliminary Design Report: Topside. May 2017.

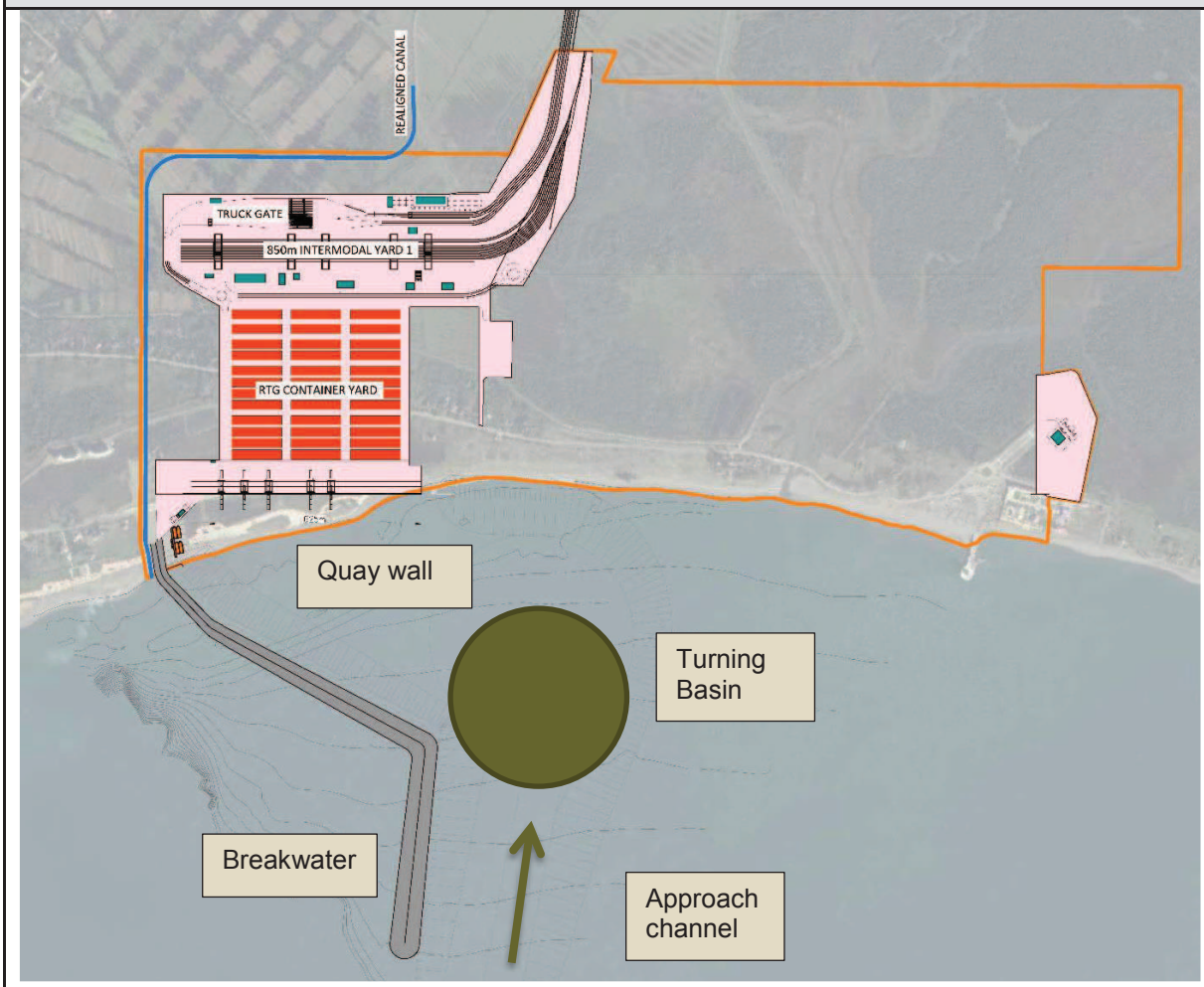
4.2.2 Project Concept for Phase 1

Phase 1 of the proposed development will comprise the construction and operation of the following infrastructures and facilities:

- **Marine components**: a breakwater, a quay wall and an approach channel, turning basin and berthing pocket. It also includes a service vessel berths, Aids to Navigation (AtN) and, possibly, a coastguard base.
- **Landside components**: a container yard, a truck gate, an intermodal rail yard, buildings and utilities (including power supply, communications systems, water supplies and drainage systems). It will also include fencing and access controls.

The main Project infrastructure and facilities are shown in **Figure 4-3.**

Figure 4-3: Project Layout[2]



4.2.3 Project Construction and Operational Activities

An Environmental Impact Assessment (EIA) was prepared in September 2017 to gain consent in Georgia for the proposed development, in line with national regulations.

The EIA has identified the activities to be carried out during construction and operation of the port during Phase 1. These are as described in **Table 4-1**.

Table 4-1: Nature of Activities proposed during Phase 1 Port Construction and Operation

Construction	Operation
▪ Pre-construction works (e.g. site clearance, drainage, etc.). ▪ Marine construction works (dredging, disposal at sea, re-use of dredged materials, land reclamation, breakwater and quay wall construction, AtN, berths and coastguard base, etc.). ▪ Landside works (container yard, truck gate, intermodal yard, buildings, utilities installation, etc.). ▪ Workforce, equipment, waste management, etc.	▪ Container handling and movement. ▪ Container storage. ▪ Port drainage and lighting. ▪ Vessels and trucks movements, rail movements, staff vehicle movements. ▪ Maintenance of Port Infrastructure and Equipment. ▪ Maintenance dredging and disposal. ▪ Port operation workforce / waste management.

4.2.4 Associated Development

A number of associated developments are envisaged in addition to the proposed Project. These are as follows:

- Development of a new road (highway) and rail infrastructure by the Government of Georgia (GoG) to facilitate access to the port by providing direct connections with the port's truck gate and intermodal yard.
- Connection to the existing water supply network and sewer network.
- Development of a new external infrastructure to connect to the existing electricity transmission infrastructure.

4.3 Environmental and Social Commitment of the Project

ADC and contractors, as well as subcontractors and suppliers, are bound by the E&S Policy (see the front section of the document and **Section 3**). This represents the Project Sponsors' commitment to develop a sustainable Project by taking into account environmental, social, health and safety aspects.

ADC's requirements are designed to ensure that sustainable opportunities for improvement are sought, and that adverse impacts on the environment, security, health and safety of workers and local communities during construction and operation are limited to the minimum possible.

Furthermore, the development of any project within Georgia is subject to a legislative framework based on the specifics of the Project. The present Manual and associated documentation will refer to applicable national regulation as well as international guidance and standards (see **Section 5.2.2**).

This document has taken into consideration the environmental and social impacts and sensitivities of the Projects through review of the Project EIA report, as outlined in **Section 5.2.1**.

Environmental and social commitments need to be adhered to throughout the Project, where relevant, and will be cross-referenced within the relevant topic specific 'Management Plans' (**Appendix D**).

ADC Top Management demonstrates leadership and commitment with respect to the ESMS by:

- Taking accountability for the effectiveness the ESMS;
- Ensuring E&S Policy and objectives are established and compatible with the strategic direction and context of the organisation;
- Ensuring the integration of ESMS requirements into organisation's Anaklia Port Development Project processes;
- Communicating the importance of effective environmental and social management and conforming to ESMS requirements;
- Ensuring ESMS achieves and its intended outcomes;
- Directing and supporting employees and Contractors to contribute to the effectiveness of ESMS;
- Promoting continual improvement; and
- Supporting other relevant management roles to demonstrate their leadership as it applies to their area of responsibility.

5. Environmental and Social Management System Requirements

5.1 Environmental and Social Management System Components

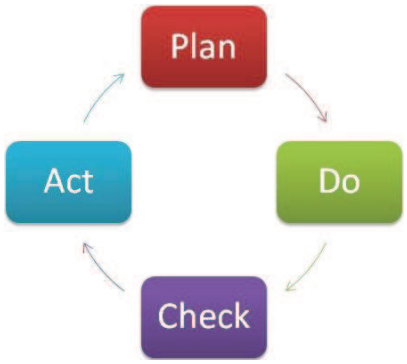
The ESMS will be documented, implemented and kept updated. Key components of the ESMS are:

- E&S Policy, Environmental and Social Aspects (which have significant impacts on physical and social environment) and Impacts,
- Defined legal and other requirements;
- Environmental and Social Objectives/ Targets (which are measurable, practicable and also consistent of the E&S Policy) and Planning Programme(s) to Achieve Them;
- Resources, roles and responsibilities (which are supported with defined internal and external communication);
- Competence, Training and Awareness;
- Environmental and Social Procedures and Plans;
- Environmental & Social Forms and Records;
- Emergency preparedness and response;
- Regularly monitoring and measurement of key characteristics of activities and services significant environmental and social impacts;
- Compliance check against commitments and legal/other requirements;
- Nonconformity and corrective actions (to mitigate environmental and social impacts); and
- Internal audit and ADC's Top Management's review.

5.2 Planning

The ISO 14001: 2015 works based on the methodology PLAN-DO-CHECK-ACT (PDCA) cycle (See **Figure 5-1**). Based on the PDCA cycle, ISO 14001:2015 provides a framework and specifies the most important requirements to identify, control and monitor the environmental and social aspects of the organization, and how to manage and improve the whole system. ADC applies PDCA cycle to its ESMS.

Figure 5-1: PDCA



The four steps in the cycle are as follows:

Plan: Establish the objective and processes needed to achieve the organization's E&S Policy.

Do: Implement the procedures and processes which are defined by the ESMS system.

Check: Monitor and measure the implemented process.

Act: Take action on the reported results to ensure that the implemented process has met the ESMS requirements, which maintains and continually improves the ESMS.

5.2.1 Environmental and Social Aspects

The planning process outlined above commences with the identification (or, if previously identified, updating) of environmental and social aspects.

The environmental and social aspects are the elements of ADC's activities or services that have or may have impact on the physical and social environment. Significant environmental aspects can result in risks (adverse impacts) and/or opportunities (beneficial impacts).

ADC has prepared a national EIA Report which was submitted to the Ministry of Environment and Natural Resources Protection on 13 September 2017. The EIA Report identifies significant impacts of the Project on the physical, ecological and human environment during both construction and operation of Phase 1. A summary of the key environmental and social aspects of the Project are listed below:

- Effects on marine resources and coastal processes;
- Impact on marine sediment and marine sediment and water quality;
- Impact on land resources and land quality;
- Impact on surface water resources and surface water quality;
- Impact on groundwater resources and groundwater quality;
- Impact on biodiversity;
- Impact on landscape and visual amenity;
- Impact on transport and access;
- Impact on air quality;
- Impact on noise and vibration;
- Impact on social – economy and local community (including labour influx, land acquisition/resettlement, etc.); and
- Impact on social - cultural heritage.

The EIA proposes a set of appropriate mitigation, monitoring and compensation measures for significant impacts (i.e. major or moderate), to avoid, minimise or compensate adverse impacts of the Project on receptors and optimize beneficial impacts. These are presented in a concise manner at the end of the EIA, which provides a preliminary framework for the development of the Environmental and Social Mitigation and Monitoring Plan (ESMMP) of ADC.

As the Project progresses, additional environmental and social issues will arise and ADC will need to continually identify environmental and social aspects of the Project and keep record of this process.

In line with the ISO14001: 2015 approach, ADC will establish, implement and maintain a procedure to identify environmental and social aspects of its activities, products or services

under its control, and those that it can influence taking into account planned or new developments, or new or modified activities, products and services.

The procedure will provide a methodology which will specify which criteria are used to determine the significance of its environmental and social aspects (and associated impacts) and to define when specific mitigation measures need to be put in place and who is responsible for it. When planning these actions, ADC will consider technological options, and financial, operational and business requirements.

These environmental and social aspects, inclusive of those arising from works carried out by contractors, will be registered in the 'Register of Environmental and Social Aspects'. ADC will keep this information up-to-date.

Relevant procedure: Identification and Evaluation of Environmental and Social Aspects Procedure.

Relevant record: Register of Environmental and Social Aspects.

5.2.2 Legal and Other Requirements

5.2.2.1 Introduction

ADC has identified the list of legislative requirements and international standards and guidance applicable to the proposed development. These are as follows:

- National regulatory requirements in Georgia (see **Section 5.2.2.2**);
- International Conventions signed and/or ratified by Georgia (see **Section 5.2.2.3**);
- EBRD Performance Requirements (see **Section 5.2.2.4**);
- Other international standards and guidance (see **Section5.2.2.5**).

As part of the ESMS development and implementation, ADC will identify relevant actions that need to be undertaken during the construction and operation of Phase 1 to be compliant with these requirements.

ADC will develop a procedure to identify all relevant regulations, codes of practice and guidelines that are applicable to the environmental and social aspects of its activities, products and services; and maintain access to all legal requirements that are relevant to its activities, products and services.

The purpose of the procedure is to achieve regulatory compliance in ISO 14001:2015 i.e. ensure that appropriate actions are put in place to maintain compliance with regulatory requirements and that necessary license, authorisation and permit are obtained in due course as the Project progresses. ADC will record this information in the 'Register of Legal and Other Requirements'.

Relevant procedure: Review of Legal and Other Requirements Procedure.

Relevant record: Register of Legal and Other Requirements.

5.2.2.2 National Regulatory Requirements

The Project will comply with Georgian legislative requirements (e.g. environmental quality standards for water, air and noise) and will consider relevant national regulations to the Project activities. These are as follows:

- Law on Environmental Protection (December 10, 1996, as amended).
- Law on Environmental Impact Permit (December 14, 2007). Law on Licences and Permits (January 24, 2005).
- Law on Ecological Expertise (December 14, 2007).
- Law on Water (October 17, 1997).
- Law on Soil Protection (May 12, 1994)
- Law on Protection of Atmospheric Air (June 22, 1999)
- Waste Management Code (December 26, 2014)
- Law on Wildlife (December 26, 1996)
- Law on Red List and Red Book (June 6, 2003)
- Labour Code of Georgia (2010; last amended in 2013)
- Law Concerning the Social Protection of Disabled People (1995).
- Law on Trade Unions (1997).
- Law Concerning the Social Protection of Repressed Persons and Acknowledgement of Those as Victims of Political Repressions (1997).
- Law on Social Aid (2006).
- Law on Mental Aid (2006).
- Law on Public Health (2007).
- Law on HIV / AIDS (2009).
- The Constitution of Georgia (1995).
- Civil Code (1997).
- The Civil Procedural Code of Georgia (1997).
- Law on Compensation of Substitute Land Reclamation Cost and Damages in Allocating Agricultural Land for Non-Agricultural Purposes (1997).
- Law on Procedures for Expropriation of Property for Necessary Public Needs (1999).
- General Administrative Code of Georgia (1999).
- Law on the Rule for Expropriation of Property for Urgent Public Needs (1997).
- Law on Ownership Rights to Agricultural Land (1996).
- Law of Georgia on Declaration of Private Ownership Right to the Land Parcels under Possession (Use) of Physical and Legal Persons of Private Law (1998).
- Law on Privatization of State-Owned Agricultural Land (2005).
- Law on Registration of Ownership Rights to Immovable Property (2006).
- Law on Entitlement of Ownership Rights to Lands Possessed (Used) by Physical and Legal Persons of Private Law (2007).
- Law on Public Register (2008).

5.2.2.3 International Conventions

The relevant International Conventions relevant to the Project are listed below:

- Convention the Protection of the Black Sea Against Pollution (1994).
- Protocol on the Protection of the Black Sea Marine Environment against Dumping.
- Protocol on Cooperation in Combatting Pollution of the Black Sea Marine Environment by Oil and other Harmful Substances in Emergency Situation.
- Convention on the Prevention of Marine Pollution from Ships (MARPOL) (1973/78).
- Convention for the Safety of Life at Sea (SOLAS) (1974).
- Convention for the Control and Management of Ship's Ballast Water and Sediments.
- Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter (London Convention) (1972).
- The International Convention on the Control of Anti-Fouling Systems on Ships (2008).
- European Convention on the Protection of the Archaeological Heritage (1992).
- Convention for the Protection of the Architectural Heritage of Europe (1985).
- Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979).
- European Landscape Convention (2000).
- United Nations Convention on Biological Diversity (1992).
- Cartagena Protocol on Biosafety to the Convention on Biological Diversity (2000).
- United Nations Convention to Combat Desertification (1994).
- United Nations Framework Convention on Climate Change (1992).
- United Nations Framework Convention on Climate Change, Kyoto Protocol (1997).
- Aarhus Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters, (1998).
- Vienna Convention for the Protection of the Ozone Layer, (1985).
- Montreal Protocol on Substances That Deplete the Ozone Layer and amendments made in London (1990), Copenhagen (1992), Vienna (1995), Montreal (1997), and Beijing, (1999).
- Geneva Convention on Long-Range Transboundary Air Pollution (1979).
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal (1989).
- Stockholm Convention on Persistent Organic Pollutants (2001).
- Rotterdam Convention on the Prior Informed Contest for Certain Hazardous Chemicals and Pesticides in International Trade (1998).
- Convention on the Conservation of Migratory Species of Wild Animals (Bonn Convention) (1979).
- Agreement on the Conservation of Bats in Europe (EUROBATS) (2001).
- Agreement on the Conservation of African-Eurasian Migratory Waterbirds (2001).
- Paris Convention on the Protection of the World Cultural and Natural Heritage (1972).
- European Convention on the Protection of the Archaeological Heritage (1992).
- Convention for the Protection of the Architectural Heritage of Europe (1985).

5.2.2.4 EBRD Performance Requirements

The Project will comply with EBRD's Environmental and Social Policy (EBRD, 2014), which covers compliance with the relevant Performance Requirements (PRs) as listed below:

- PR 1 - Assessment and Management of Environmental and Social Impacts and Issues.
- PR 2 - Labour and Working Conditions.
- PR 3 - Resource Efficiency, Pollution Prevention and Control.
- PR 4 - Health and Safety.
- PR 5 - Land Acquisition, Involuntary Resettlement and Economic Displacement.
- PR 6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources.
- PR 7 - Indigenous Peoples.
- PR 8 - Cultural Heritage.
- PR 9 - Financial Intermediaries.
- PR 10 - Information Disclosure and Stakeholder Engagement.

5.2.2.5 Other international standards and guidance

The Project will comply with international standards and guidelines, as appropriate. These requirements include, but are not limited to, the international approach of Good Industry Practice (GIP) based on the IFC's EHS General Guidelines (2007) and the IFC's EHS Guidelines for Ports, Harbour and Terminals (2017).

5.2.3 EIA commitments

The Project will need to consider the 'reference criteria' identified in the EIA. ADC will need to develop specific objectives and targets for each significant environmental and social aspects identified. The Project will need to be compliant with these 'reference criteria'.

ADC will develop Project specific Environmental and Social Action/Management Plans to achieve ADC's environmental and social objectives. Once established, these will be periodically reviewed and updated.

A draft list of Plans for the Project is as follows:

- Environmental and Social Management Plan (ESMP);
- Environmental Mitigation and Monitoring Plan;
- Construction Environmental and Social Management Plan (CESMP);
- Pollution Prevention Plan;
- Drainage / Stormwater Management Plan;
- Lighting Management Plan;
- Traffic Management Plan;

- Operational Environmental and Social Management Plan (OESMP);
- Environmental and Social Action Plan (ESAP);
- Waste Management Plan (WMP);
- Emergency Response Plan (ERP);
- Shoreline Monitoring and Management Plan (SMMP);
- Dredging, Land Reclamation and Disposal of Dredged Material Monitoring and Management Plan;
- Noise Management Plan;
- Air Quality Management Plan;
- Labour Management Plan;
- Community and Occupational Health and Safety Management Plan;
- Biodiversity Management Plans; and
- Stakeholder Engagement Plan.

5.2.4 Environmental and Social Objectives, Targets and Planning

ADC will set environmental and social objectives. These will take into account the outputs from the analysis of environmental and social aspects and associated Project compliance obligations, and risks and opportunities arising from potential adverse and beneficial impacts.

The objectives and targets will follow the SMART criteria (i.e. Specific, Measurable, Attainable, Realistic, Timely) and will be consistent with the ADC's Project commitments and E&S Policy.

Detailed programmes and/or action plans will be established, implemented and maintained in order to achieve ADC's Project objectives and targets. The programmes and/or action plans will indicate:

- What will be done;
- What resources will be required;
- Who will be responsible;
- Date of completion; and
- How the results will be evaluated, including indicators for monitoring progress toward achievement of its measurable environmental and social objectives.

ADC will maintain documented information on the environmental and social objectives and ensure that environmental and social objectives are communicated to its employees, contractors and other relevant stakeholders.

The programmes will be amended as appropriate for new projects or modified activities, products and services. This will ensure that environmental and social management applies to such projects and activities.

Relevant procedure: Environmental and Social Objectives and Targets and Planning.

6. Implementation and Operation of the ESMS

6.1 Organisational Structure and Resources

ADC has determined an organisational structure to develop and implement the ESMS.

- The Top Management has appointed a Management Representative and an ESMS Responsible Person to fulfil the commitment to continual improvement of the ESMS and to enhance environmental and social performance.
- The Management Representative is responsible for ensuring that all requirements of the ESMS are fulfilled and is reporting to Top Management on the performance of the ESMS and chairs the Management Review Meetings.
- The ESMS Responsible is in charge to maintain the conformance of the ESMS with the Project's commitments and objectives.
- The Management Review Committee will revise the objectives, targets and programmes as necessary, to ensure the suitability, adequacy and effectiveness of the ESMS.

The organisation structure of ADC for the ESMS implementation is presented in **Figure 6-1** and **Figure 6-2**.

Figure 6-1: Organisation Structure for the ESMS

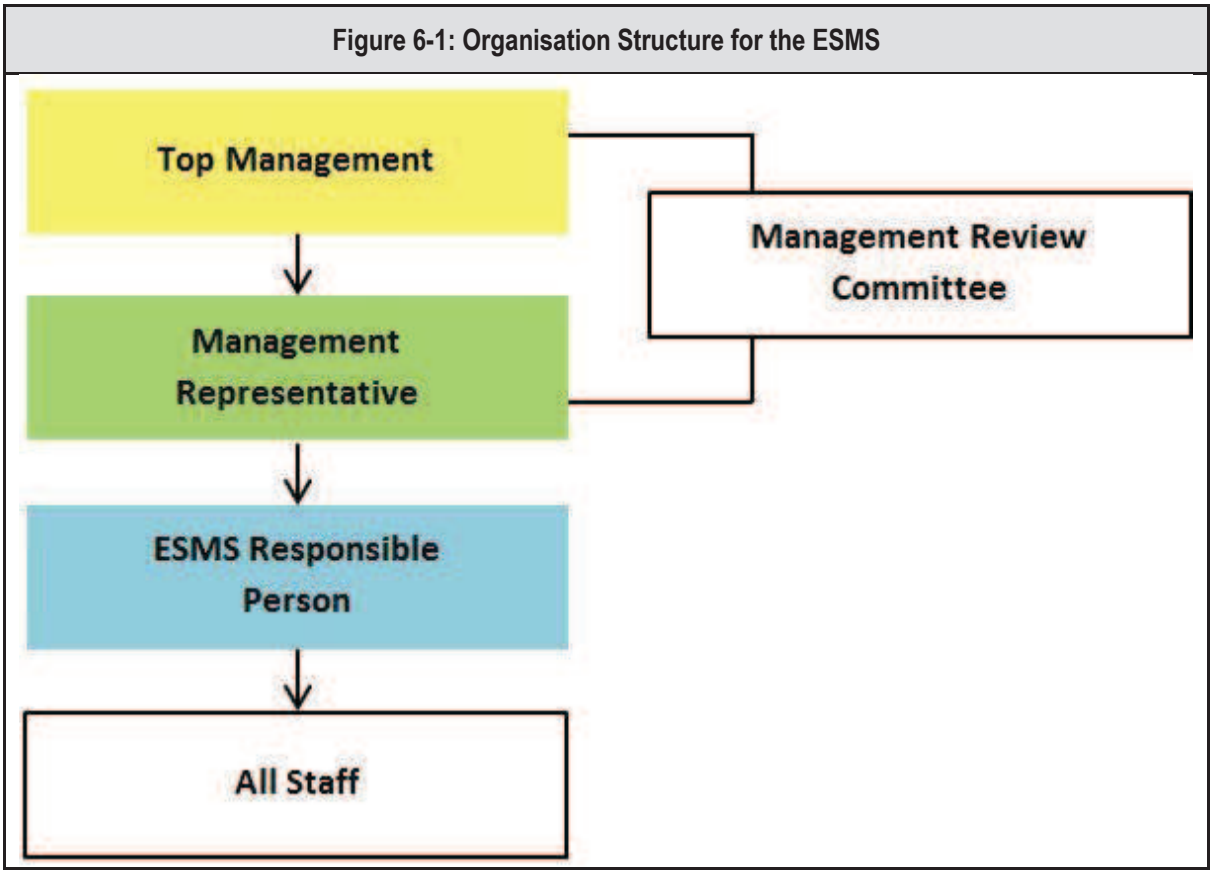
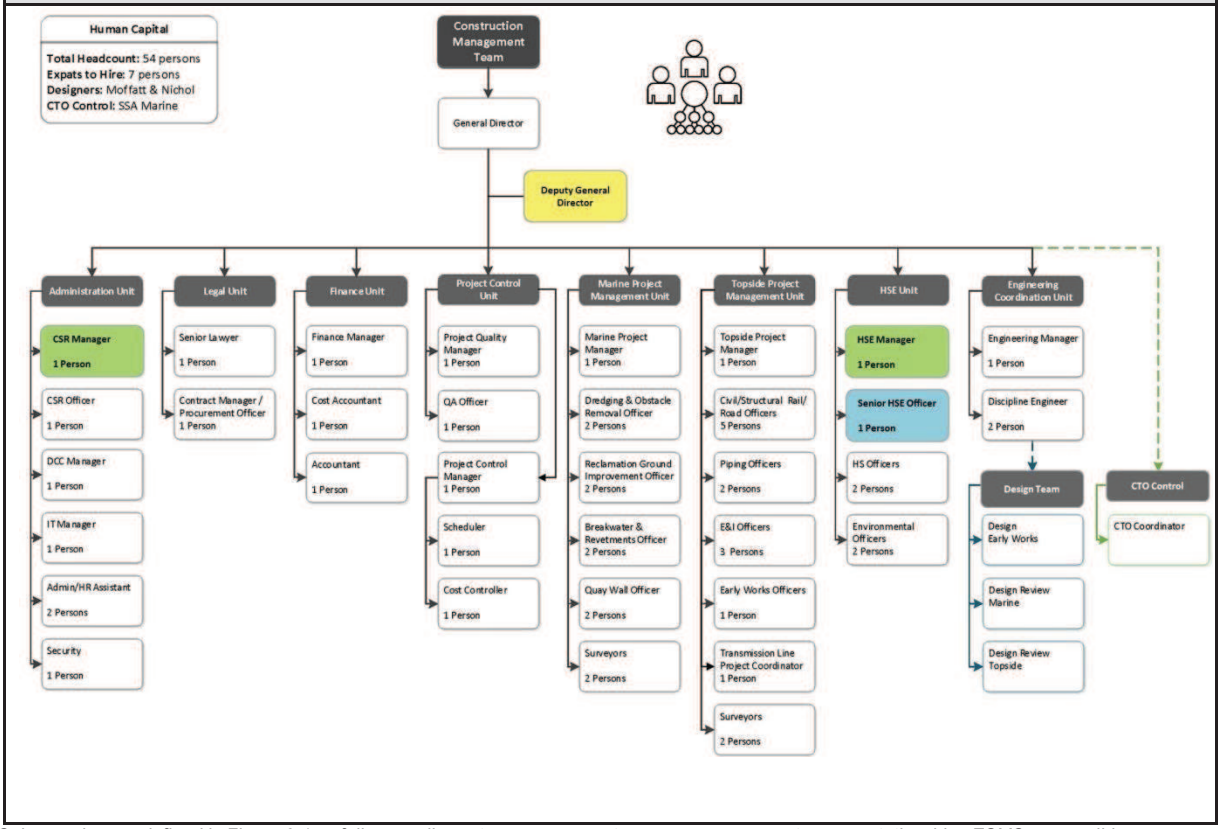


Figure 6-2: Organisation Structure of ADC to deliver the ESMS



**Colour codes are defined in Figure 6-1 as follows: yellow – top management, green - management representative, blue ESMS responsible person.*

6.2 Roles, Responsibilities and Authorities

Table 6-1 presents the key positions / department involved in the ESMS development and implementation, and a brief description of their role, responsibilities and authorities.

Table 6-1: Key Role, Responsibilities, Authorities and Competencies

Position	Role, Responsibilities and Authorities	Competence / certificates
Deputy General Director	▪ *Role:* Top Management ▪ *Responsibilities and Authorities:* Overall management for the implementation of the ESMS; Ensuring appropriate resource (including human resource) allocation for the proper implementation of the E&S Policy and ESMS; and Implementing E&S Policy.	▪ ISO14001 basic training for top management
Project's Environment, Health and Safety (EHS) Manager in coordination with Corporate Social	▪ *Role:* Management Representative ▪ *Responsibilities and Authorities:* Ensuring that all requirements of the ESMS are fulfilled; Implementation of the ESMS; Monitoring of nonconformities and corrective actions;	▪ ISO14001 basic training for top management ▪ ISO14001 training

Table 6-1: Key Role, Responsibilities, Authorities and Competencies		
Position	**Role, Responsibilities and Authorities**	**Competence / certificates**
Responsibility (CSR) Manager	Responsibility for internal and external communications on environmental and social (and health and safety) issues, receiving complaints, maintaining the grievance register and contacting the complainants; Coordinating internal ESMS audits to ensure ESMS has been properly implemented; Reporting on the performance of the ESMS to Top Management; and Chairing the Management Review Meetings. The CSR Manager will be responsible for communications with the public, community representatives and NGO representatives, including key stakeholder groups and affected communities	
Senior HSE Officer	▪ *Role:* ESMS Responsible Person ▪ *Responsibilities and Authorities:* Maintaining the conformance of the ESMS; Delivering training to all new staff on arrival and all existing staff on a refresher basis, to raise environmental and social awareness and to inform about ESMS; Providing an induction training to contractors and their staff; Supervision of the Contractor's personnel; and Making sure that services and activities are carried out in accordance with relevant applicable legislations and standards.	▪ ISO14001 training and internal auditor certificate ▪ (preferably) ISO 14001 lead auditor certificate
Deputy General Director and Management Representative	▪ *Role:* Management Review Committee ▪ *Responsibilities and Authorities:* Systematically examination the ESMS to ensure the suitability, adequacy and effectiveness of the ESMS.	▪ ISO14001 basic training
ADC Staff	▪ *Role:* All Staff ▪ *Responsibilities and Authorities:* Working in accordance with the documented procedures (including E&S Policy) and instructions as per training received; and Reporting problems or deviations associated with environmental and social issue and the ESMS.	

6.2.1 Role and responsibilities of the contractors

The contractors commissioned by ADC during Phase 1 construction and operation will be required to comply with:

- ADC E&S Policy and the present ESMS;
- Environmental and social action/management plans which specify the E&S requirements of the Project; and
- Applicable national regulations, international guidance and standards.

Contractor personnel play a significant role in achieving the environmental and social performance of the Project as well as maintaining the regulatory compliance. Therefore, contractors must be aware of the ESMS requirements associated with their activities. Contractors will be required by ADC to communicate all relevant information to their employees who work for the Project.

Contractors will be required to be appropriately trained and maintain records of any appropriate education, training or experience received (e.g. certifications, training log, etc.). Contractors should be able to demonstrate compliance at any time, when requested by ADC.

Contractor personnel and ADC employees will work together to meet the goals of the ESMS.

6.3 Competence, Training and Awareness

ADC will ensure that any person who performs a task directly or indirectly for ADC, which includes contractors, sub-contractors, temporary staff and remote workers, is adequately educated, trained and competent (i.e. has sufficient experience) to perform for the task.

ADC will provide specific training on ESMS to all personnel working for ADC. This training will be adapted to the role and responsibilities of the category of personnel involved and will address:

- The importance of the E&S Policy, significant environmental and social aspects of the Project, and relevant procedures/instructions/records and management plans;
- The potential impacts associated from their work activities and how they contribute to the overall ESMS objectives; and
- The roles and responsibilities in achieving conformity with the ESMS during construction and operation.

ADC will establish, implement and maintain a procedure to identify the training needs for internal staff and contractors. ADC Human Resources Department will prepare a Training Plan for the activities proposed during construction and operation of Phase 1, and keep it up to date.

ADC's EHS Team will be responsible for coordinating training and maintaining training records. The EHS Coordinator will report to the EHS Manager. The EHS Coordinator will plan and undertake regular audits and site inspections to verify the competencies of internal staff and third parties.

The contractors will have the responsibility to undertake some training on site for e.g. site induction, EHS awareness training for specific construction and operation activities, etc. The

training responsibilities will be clearly defined in the contract documents between ADC and the contractors. ADC will approve the content of the training programmes to ensure that clear instructions are provided to staff and that these are coherent with the ESMS framework.

Relevant procedure: Competence, Training and Awareness Procedure.

Relevant Records: Records of training, skills, experience and qualifications.

6.4 Communication

6.4.1 Key responsible staff

Both internal and external communications on environmental and social (and health and safety) issues will be managed by ADC's EHS Manager and CSR Manager. These managers will be supported locally by teams based in ADC's offices in Tbilisi and Anaklia.

The contact details of the EHS Manager and the CSR Manager (or a contact platform) will be made publicly available to allow a transparent communication line between ADC and internal and external stakeholders.

ADC will establish clear, formal procedure for both internal and external communication during the construction and operation phases.

Relevant Procedure: Enquiry / Complaint / Nonconformity Handling.

6.4.2 Internal communication

ADC will set up a system to allow ADC's employees and contractors (including sub-contractors, temporary staff and remote workers) to be consulted on a range of matters. This will ease internal communication and will allow to feedback any relevant information likely to affect the ADC's operation and integrity / reputation, and its relations with third parties.

The EHS Manager and CSR Manager will be responsible for receiving and recording complaints and contacting the complainants. Concerns associated with environmental and social issues and the ESMS will be notified to the Management Representative through monthly complaints reports. Additionally, internal communication issues will be discussed during periodic Management Review Meetings.

Relevant Records: Internal Communication Register.

6.4.3 External communication

The EHS Manager will be the main point of contact for the various ministries, authorities and municipal representatives, and will manage all communications related to EHS issues (including permitting). ADC's Deputy Senior Construction Manager will be kept informed of such communications and will highlight potential integrity / reputation issues that may arise as the Project progresses. Any important information gathered by the EHS Manager will be communicated to ADC staff and, as appropriate, to the construction contractors and sub-contractors.

The CSR Manager will be responsible for communications with the public, community representatives and NGO representatives, including key stakeholder groups and affected communities. The CSR Manager will facilitate the dissemination of information necessary to address environmental and social issues through coordinating community notifications (e.g.

meetings, media announcements, written postings) and through stakeholder interaction. The CSR Manager will coordinate with the EHS Manager.

Currently, ADC has opened a Public Information Centre (PIC) in Anaklia. The PIC provides information about the Project (including timing and notices), registers job applications, and gathers and records grievances / complaints via the grievance mechanism (see **Section 6.4.5**).

Relevant Records: External Communication Register.

6.4.4 Participation and consultation

ADC have prepared and published a draft Stakeholder Engagement Plan (SEP) on 11 January 2017. The SEP is a tool to plan and manage the forthcoming consultations and meetings prior to the commencement of construction activities. Currently, the SEP is under revision and will be updated in October 2017. The final SEP will present ADC's strategy to engage with local, regional and national stakeholders during all phases of the Project. This is to form a robust base for dialogue and cooperation between the Project's stakeholders.

The SEP approach and strategy will be conducted in line with the legislation of Georgia and international guidance (i.e. the EBRD's Performance Requirement PR 10).

Relevant Records: Evidence of communications.

6.4.5 Grievance Mechanism

The Project involves environmental and social areas of influence that relate generally to the local communities. Given the large scale of the Project, ADC have developed a Grievance Mechanism (GM) to manage complaints (i.e. grievances and concerns).

The GM describes the process by which external parties (such as community members or others who consider themselves affected by Project activities) can feedback their grievances or concerns to ADC and/or the contractors. The GM specifies the time frames and procedure through which complaints are resolved and who is responsible for handling them.

Relevant Procedure: Grievance Register Mechanism Related Forms.

6.5 Documented Information

The ESMS encompasses a set of documents required by ISO 14001:2015 and regulatory requirements, and also those determined by ADC as being necessary for the effectiveness of the ESMS. These include the ESMS Manual, the E&S procedures and instructions, and E&S records.

ADC will establish and implement a procedure for the management of ESMS documentation and records to ensure that the Project information is recorded, filed and archived adequately. The procedure will ensure that:

- Regular review of documented information is carried out;
- The process to manage changes in documents and records is in place;
- Referencing of documentation and records is undertaken correctly;
- The process to manage distribution and publication of documented information is compiled with; and

- Appropriate level of approval authority is obtained.

ADC will need to produce the following documents to be compliant with ISO 14001:2015:

- ESMS Scope;
- E&S Policy;
- Risk and opportunities to be addressed and processes needed;
- Criteria for evaluation of significant environmental and social aspects;
- Environmental and social aspects with associated environmental and social impacts;
- Documented information of compliance obligations;
- Documented information on environmental and social objectives;
- Documented information as evidence of competence;
- Documented information as evidence of communication;
- Evidence of monitoring, measurement, analysis and evaluation results;
- Evidence of evaluation results and compliance with defined objectives/targets;
- Evidence of the implementation of the audit programme(s) and the audit results;
- Documented information as evidence of the results of the management reviews; and
- Information of the nature of the nonconformities and any subsequent actions taken, and the results of any corrective action.

ADC will develop the required ESMS documentation and will keep the records as per the document control procedure (**Appendix C**). The ESMS records will be used to measure the performance of the ESMS. These include for example training records, inspection reports, risk assessment and self-assessment results, corrective actions, trend analysis, audit reports, incident investigation results, obsolete documents, etc.

Relevant Procedure: **Control of Documented Information Procedure.**

Relevant Records: **List of Documents and Owners.**

6.6 Operational Planning and Control

ADC will establish, implement, control and maintain the processes needed to meet ESMS requirements and establish operating criteria for these processes.

ADC will ensure that all operations and activities carried out by its employees or contractors that are associated with the significant aspects are properly controlled, and that appropriate operational control procedures and instructions are communicated to personnel whose tasks may result in significant environmental aspects.

ADC will decide how to develop these procedures and instructions and how to combine these processes to control of its environmental and social aspects in line with the Project requirements. ADC will also ensure that controls for outsourced processes are defined and implemented.

ADC will also take the following into consideration for its operational planning and control:

- Establish controls to ensure environmental and social requirements are addressed during the design, construction and operation phases;

- Determine environmental and social requirements for procurement of products and services;
- Communicate environmental and social requirements to providers (including suppliers, contractors and others);
- Provide key environmental and social information on products and services in the context of their life cycle (e.g. end-of life information); and
- Maintain documented information to the extent necessary to have confidence that the processes have been carried out as planned.

Relevant Procedure: **Operational Planning and Control.**

Relevant Records: **Master List of Operational Control Procedure(s).**

6.7 Emergency Preparedness and Response

ADC have prepared an Emergency Response Plan (ERP) (ADC, 2017) which is applicable to the site office, storage and working areas, and both marine and land based equipment. The ERP describes the proposed tasks and responsibilities in case of emergency. The ERP also identifies the type of emergencies expected and provides high-level information on the systems and procedures to adopt in case of emergency. The ERP also outlines the arrangements for training (emergency) response teams and testing of emergency systems.

ADC have developed the existing ERP to reflect the activities proposed respectively by the main construction contractor(s) during port construction and the operation contractor during port operation. The ERP comprises plans and procedures to identify the potential for and response to environmental accidents and health and safety emergency situations and for preventing and mitigating potentially adverse environmental and social impacts that may be associated with them.

ADC will review and revise its emergency preparedness and response procedure, in particular after the occurrence of accidents or emergency situations.

ADC will periodically test the procedure and the preparedness where practicable of its staff and contractors.

Relevant Procedure: **Emergency Preparedness and Response.**

7. Evaluating the Performance of the ESMS

7.1 Monitoring, Measurements and Evaluation of Compliance

As per ISO 14001: 2015 requirements, ADC will establish, document, and implement a procedure to:

- Monitor and measure the key operations related to significant environmental and social aspects and ESMS performance. This will ensure that there is adequate control on significant environmental and social aspects, contractors' environmental and social performance, compliance with legal and other requirements, and that the Project is able to achieve its objectives and targets; and
- Periodically evaluate compliance with all relevant legal environmental and social requirements, manage actual and potential nonconformity.

Both the construction and operation contractors will develop specific procedures to control the implementation of mitigation and monitoring measures. Each of the mitigation and monitoring measures will have a control procedure that will specify methods, best management practices, roles, responsibilities, monitoring frequency, and record keeping for avoiding or reducing the impacts. The control procedures will make reference, where relevant, to best practice documents or guidance which describes in detail how to avoid or minimise adverse impacts identified in the environmental and social assessment studies of the Project.

ADC will also ensure that environmental and social monitoring and measuring equipment are calibrated, verified and maintained and their records are retained.

Relevant Procedure: **Monitoring, Measurements and Evaluation of Compliance.**

Relevant Record: **Results and Evidence of the Compliance Evaluation.**

7.2 Internal Audit

ADC will prepare an internal audit programme which will covers all processes described in the ESMS. Additional internal audits on projects or particular processes may be arranged and executed at any time at the discretion of the responsible persons at ADC.

An internal audit procedure will be developed by ADC with the main goals to:

- Ensure that the procedures incorporated into the ESMS are being followed; and
- Determine if the ESMS itself requires revision or restructuring.

The results of internal audits will be used for continuous improvement of the ESMS.

Relevant Procedure: **Internal Audit Programme.**

Relevant Record: **Audit Report Template, Audit Results and List of Internal Auditors.**

7.3 Management Review

ADC will establish and maintain a management review procedure to ensure that the ESMS is reviewed by the Top Management, at planned intervals, to ensure its suitability, adequacy and effectiveness.

The management review typically covers:

- The status of previous actions from management reviews;
- Changes in internal/external inputs, significant aspects/impacts and compliance obligations;
- Achievement and progress on environmental and social objectives;
- Information on environmental and social performance;
- Communications from external interested parties;
- Opportunities for continual improvement; and
- Adequacy of resources for the ESMS.

The output from the management review should include any decisions and actions related to:

- Conclusions on the suitability, adequacy and effectiveness of the system;
- Continual improvement opportunities;
- Changes to the ESMS, including resources;
- Actions relating to objectives not achieved; and
- Implications for the strategic direction of the organisation.

The documented information shared prior, during and after the management review will be kept.

Relevant Record: Minutes of the Management Review Meetings.

8. Improvement

8.1 Nonconformity and Corrective Action

ADC will establish and maintain a procedure for defining responsibility and authority for handling and investigating nonconformance, taking action to mitigate any impacts caused, and for initiating and completing corrective action.

Corrective action will be used to improve ADC's processes, and will be undertaken to eliminate causes of nonconformities or other undesirable situations so as to avoid recurrence of those problems.

In order to investigate a problem and its underlying causes ADC will identify problem through routine inspection, monitoring, audit findings, trend analysis, employee comments, complaint and experience.

ADC will retain documented information as evidence of:

- The nature of the nonconformities and any subsequent actions taken; and
- The results of any corrective action.

Relevant Procedure: **Non-conformity and Corrective Action.**

Relevant Record: **Non-conformity records, and Verification and Results of any corrective action.**

8.2 Continual Improvement

ADC has adopted an approach to continually improve the effectiveness of its ESMS through the use of the E&S Policy, objectives, and audit results, analysis of monitored events, indicators, risk analysis, corrective actions and management review.

APPENDIX A

Cross Reference to ISO 14001:2015 Requirements and Sections in the ESMS

No.	Document/Form Name	ESMS Section No.	Ref. No. Procedure or Plans
4	Context of the organization		
4.4	Environmental management system	1 & 5.1	
5	Leadership		
5.1	Leadership and commitment	4 & 4.3	
5.2	Environmental Policy	Front of the document and 3	
5.3	Organization roles, responsibilities and authorities	6.1 & 6.2	
6	Planning		
6.1	Actions to address risks and opportunities	6	
6.1.2	Environmental aspects	5.2.1	
6.1.3	Compliance obligations	5.2	
6.1.4	Planning action	5.2.4	
6.2	Environmental objectives and planning to achieve them	5.2.4	
6.2.1	Environmental objectives	5.2.4	
6.2.2	Planning actions to achieve environmental objectives	5.2.4	
7	Support		
7.1	Resources	6.1	
7.2	Competence	6.3	
7.3	Awareness	6.3	
7.4	Communication	6.4	
7.5	Documented information	6.5	
8	Operation		
8.1	Operational planning and control	6.6	
8.2	Emergency Preparedness and response	6.7	
9	Performance evaluation		
9.1	Monitoring, measurement, analysis and evaluation	7.1	
9.2	Internal audit	7.2	
9.3	Management review	7.3	
10	Improvement		
10.2	Nonconformity and corrective action	8.1	
10.3	Continual improvement	8.2	

APPENDIX B

Indicative List of Key Procedures, and Management and Monitoring Plans related to the ESMS framework

Document No.	Document/Form Name
Indicative list of Procedures	
EP01	Identification and Evaluation of Environmental and Social Aspects Procedure and Register of Environmental and Social Aspects
EP02	Review of Legal and Other Requirements Procedure and Register of Legal and Other
EP03	Environmental and Social Objectives and Targets and Planning Procedure
EP04	Communication Procedure (including Grievance Mechanism)
EP05	Competence, Training and Awareness Procedure
EP06	Control of Documented Information Procedure
EP07	Environmental Emergency Preparedness and Response
EP08	Cultural Heritage Management Policy and Cultural Heritage Chance Finds Procedure
EP09	Environmental Monitoring and Evaluation of Compliance
EP10	Nonconformity and Corrective Action Procedure
EP11	Internal Audit Procedure
EP12	Management Review Procedure
EP13	Operational Planning and Control Procedure
Indicative list of Management and Monitoring Plans	
ESP01	Waste Management Plan
ESP02	Beach Management Plan
ESP03	Dredging, Land Reclamation and Disposal of Dredge Material Monitoring and Management Plan
ESP04	Biodiversity Management Plans
ESP05	Emergency Response Plan
ESP06	Drainage/Stormwater Management Plan
ESP07	Lighting Management Plan
ESP08	Traffic Management Plan
ESP09	Noise Management Plan
ESP10	Air Quality Management Plan
ESP11	Chemical Handling Management Plan
ESP12	Labour Management Plan
ESP13	Community and Occupational Health and Safety Management Plan
ESP14	Groundwater Monitoring Plan

APPENDIX C

Terms of Reference and/or Guidance to develop Management Procedures

1.0 Purpose

This procedure describes the method for identifying and evaluating environmental and social aspects related to Anaklia Port Development Project carried out by ADC and determining significance of these aspects. The procedure also applies to those indirect aspects arising from works carried out by ADC's contractors.

The evaluation should result in a determination of whether or not a particular aspect has any significant environmental impacts or risks, and if so, whether or not ADC can control and/or influence those impacts.

2.0 Scope

This procedure is applicable to all activities and services of ADC.

3.0 Responsibility

The responsible persons for the implementation of this procedure and their roles will be described in this Section.

4.0 Definitions

ESMS terminology used in this procedure will be described in this Section.
Refer to ISO 14001: 2015.

5.0 Procedure

ADC will need to develop a procedure to identify and evaluate environmental and social aspects of the Project. This will be as follows:

- Step 1: Identify environmental and social aspects and associated impacts/risks which the organization can control or influence.
- Step 2: The identified environmental and social aspects/impacts will be categorized and scored (significance evaluation score). ADC will need to establish a matrix with significance criteria to evaluate the degree and the severity of impacts/risks (either positive or negative) on the physical and social environment, on the organization, and on others. ADC will determine which environmental and social aspects and associated impacts/risks are of significance.
- Step 3: For aspects which are significant or require specific actions, ADC will need to determine appropriate mitigation measures to minimise, avoid or mitigate the selected significant aspects; and formulate objectives/targets.
- Step 4: Updating the identification and evaluation of environmental aspects

The environmental and social aspects and associated impacts/risks identified will be recorded in the "Register of Environmental and Social Aspects" (see **Appendix 1**), which will be maintained.

The procedure and register shall be reviewed at least annually, or as required, to consider emerging historical and future implications, audits, complaints and changes to relevant national and international regulations, legislation and standards and activities of ADC.

	Prepared by	Reviewed by	Approved by
Signature			
Name			
Designation			
Date			

6.0 Records

Record Description	Record Location/Retention Responsibility	Minimum Retention Time
Register of Environmental and Social Aspects and Impacts		

7.0 Changes to the Procedure

Version	Reason for Change	Date

	Prepared by	Reviewed by	Approved by
Signature			
Name			
Designation			
Date			

Appendix 1: Example of Register of Environmental and Social Aspects

The scope of the Register of Environmental and Social Aspects will be as follows:

- To make information available to the management and all third parties.
- To enable screening of the environmental and social aspects (impacts/risks) and make decisions accordingly with a focus on the environmental and social management programs.
- To provide a record of the current environmental and social aspects identified on the Project. This will be updated, as required.

An Example of Register of Environmental and Social Aspects is presented below.

Table 1: Example of Register of Environmental Aspects

Aspect	Activity or service	Environmental Aspect	Environmental Impact/Risk	Legal requirements	Proposed mitigation measure (what/how)	Aspects ranking before measure	Aspects ranking after measure	Objective / target / timeframe	Person responsible
A Waste management									
Generation of waste	*General waste*	*Release of pollutants*	*Human life/threat from uncontrolled disposal to land*	*Waste Management Code*	*Implementation of specific measures in Section x of the Waste Management Procedure*	*Use matrix defined in the main procedure*	*Use matrix defined in the main procedure*		*Site Work Manager*
B Marine resources and coastal processes									
C Land resources and land quality									
D Surface water resources and surface water quality									
E Groundwater resources and groundwater quality									
F Biodiversity									
G Landscape and visual amenity									
H Transport and access									
I Noise and vibration									
J Social – economy and local community									
K Social - cultural heritage									
L Facility management									

	Prepared by	Reviewed by	Approved by
Signature			
Name			
Designation			
Date			

1.0 Purpose

The purpose of this procedure is to ensure that all legal and other regulatory requirements that are directly applicable to the activities and services of ADC are identified, up to date and are accessible to all employees, contractors and relevant third parties.

2.0 Scope

This procedure should consider all relevant legal and other requirements relevant to the environmental and social aspects of Anaklia Port Development Project of ADC and its contractors.

These have been listed in **Section 5** of the ESMS. For each environmental and social aspect listed in the Register of Environmental and Social Aspects, ADC will conduct a search of all environmental and social legislation and other requirements that applies to the Project.

3.0 Responsibility

The responsible persons for the implementation of this procedure and their roles will be described in this Section.

4.0 Definitions

ESMS terminology used in this procedure will be described in this Section.
Refer to ISO 14001: 2015.

5.0 Procedure

An indicative approach to develop the procedure is presented below.

- The relevant legal and other requirements applicable to the environmental and social aspects of Anaklia Port Development Project shall be identified, described and ADC should determine how these requirements apply to its environmental and social aspects.
- Identified legal and other requirements shall be presented in the "Register of Legal and Other Requirements" (see **Appendix 1**) ("the register"). The content of the register will be described in this section and ADC should keep the register up to date.
- The register shall be reviewed and updated every 3 months or when relevant information becomes available. The source used to update the register will be determined in this Section.
- ADC will establish a procedure to ensure that up to date copies of the legal and other requirements are accessible to all relevant employees, contractors and third parties.
- ADC shall ensure that the applicable legal and other requirements are considered in the ESMS.

6.0 Records

Record Description	Record Location/Retention Responsibility	Minimum Retention Time
Register of Legal and Other Requirements		

	Prepared by	Reviewed by	Approved by
Signature			
Name			
Designation			
Date			

7.0 Changes to the Procedure

Version	Reason for Change	Date

	Prepared by	Reviewed by	Approved by
Signature			
Name			
Designation			
Date			

Appendix 1 - Example of Register of Legal and Other Requirements

Last updated:
Next update:

Legal requirements								
Ref	**Legislation**	**Regulator**	**Relevant company activities and how it applies to organization /site**	**Control in place (procedure, monitoring alarms etc.)**	**Authorization, licenses, consents and related records**	**Responsible person**	**Environmental Training requirements**	**Compliant (Y/N) and Further action**
Biodiversity								
A1	*Red List Act*	*GoG*	*The regulator states that every action, which can result in killing, reduction in number, disturbance of living environment, reproduction area, survival stations, migratory and water-reaching ways and watering places of wild animals, is prohibited.*	*Biodiversity Management Plan*	*Permit in accordance with the Law of Georgia on Environmental Impact Permit in place*	*Environmental Manager*	*None*	*Yes*
Air								

	Prepared by	Reviewed by	Approved by
Signature			
Name			
Designation			
Date			

1.0 Purpose

This procedure aims to ensure that environmental and social objectives and targets are established in line with the ESMS requirements, and is consistent with ADC Environmental and Social (E&S) Policy and the Project commitments, especially for prevention of pollution, compliance and continual improvement in accordance with ISO 14001:2015.

2.0 Scope

This procedure aims to define a systematic approach for the identification of the ADC's environmental and social objectives and targets and should include a planning to achieve them.

3.0 Responsibility

The responsible persons for the implementation of this procedure and their roles will be described in this Section.

4.0 Definitions

ESMS terminology used in this procedure will be described in this Section.
Refer to ISO 14001: 2015.

5.0 Procedure

ADC will develop a procedure and will consider the following:

- Environmental and social objectives and targets of ADC shall be identified in accordance with ADC's E&S Policy, E&S commitment of the Project, and all relevant legal and other requirements applicable to the Project.
- The objectives and targets will follow the SMART Criteria, which stands for Specific, Measurable, Attainable, Relevant, and Time-Based. These will be applied at all levels of ADC, i.e. all relevant employees and contractors should understand how their jobs support meeting E&S objectives and targets.
- ADC shall ensure that E&S objectives and targets are communicated to its relevant employees, contractors and other stakeholders.
- Progress toward attaining to objectives and targets shall be discussed during Management Review meetings.
- If there are any significant changes (e.g. activities, operating conditions, legislation etc.), ADC shall ensure that current objectives and targets are formally reviewed and any necessary changes made.
- Where it is determined that objectives and targets have been met, new objectives and targets shall be determined to ensure continual improvement of the ESMS.
- Environmental and social objectives and targets shall be documented as per the "Control of Documented Information Procedure".

- Detailed programmes and/or action plans will be established, implemented and maintained in order to achieve ADC's Project objectives and targets. The programmes and/or action plans will indicate:

  - what will be done;

  - what resources will be required;

  - who will be responsible;

  - frequency / date of completion; and

  - how the results will be evaluated, including indicators for monitoring progress toward achievement of its measurable environmental and social objectives/targets.

- The programmes and/or action plans shall be amended as appropriate for new projects or modified activities, products and services.

6.0 Records

Record Description	Record Location/Retention Responsibility	Minimum Retention Time

7.0 Changes to the Procedure

Version	Reason for Change	Date

1.0 Purpose

The purpose of this procedure is to identify, establish, implement, document and maintain internal and external communication practices related to environmental and social management issues for ADC. This procedure considers activities and services pertinent to environmental and social management. This procedure aims to ensure that relevant, accurate and controlled information reaches appropriate personnel and bodies.

2.0 Scope

This procedure applies to all employees of the ADC, its contractors and interested external parties.

3.0 Responsibility

The responsible persons for the implementation of this procedure and their roles will be described in this Section.

4.0 Definitions

ESMS terminology used in this procedure will be described in this Section.
Refer to ISO 14001: 2015.

5.0 Procedure

5.1 Internal Communication

ADC will develop an internal communication procedure which will consider the following:

- ADC will appoint a Responsible Person for receiving and recording internal complaints and contacting the complainants. The methods of communication to direct concerns associated with environmental and social issues raised by ADC's employees and contractors to the Responsible Person will be defined in the procedure.
- The Responsible Person receiving the complaint shall record it in the "Internal Communication Register" (o equivalent) which will be maintained. ADC will advise about the timeline for the response. The information on the register may include: i) Date of Communication, ii) Contact Information of Internal Party, iii) Nature of Concern, iv) Advised Timeline for the Response.
- Concerns associated with environmental and social issues and ESMS raised by the ADC's employees and contractors shall be notified to the Management Representative by the Responsible Person through monthly complaints reports.
- A summary of internal communication issues shall be relayed to the Top Management at the periodic Management Review Meetings.
- The methods of communication which ADC will use to notify affected employees and contractors on changes or additions to the Environmental and Social Policy and procedures will be defined in the procedure.
- Individuals involved in the implementation and maintenance of the ESMS shall be aware of their individual role as part of the environmental and social performance of ADC. This should be considered in the procedure.

5.2 External Communication

ADC will develop an external communication procedure which will consider the following:

- ADC will appoint a Management Representative for receiving and recording external communications. The methods of communication to direct concerns associated with environmental and social issues raised by external parties will be defined in the procedure.
- The contact details of the Management Representative (or a contact platform) shall be made publicly available to allow a transparent communication line between ADC and external stakeholders.
- ADC shall establish a Grievance Mechanism which will provide an avenue for external stakeholders to voice their concerns and give transparency on how grievances will be managed internally. This aims to reduce conflict and strengthen relationships between external stakeholders.
- As a part of the Grievance Mechanism, management strategies will be detailed for the followings in this Section:
  - Grievance reporting channels;
  - Responsibilities of “Grievance Owner”, “Management Representative” and “ADC Employees and Contractors”;
  - Grievance Mechanism Process (i.e. receiving, recording, screening, acknowledging and investigating grievance, acts, follow up and close out) in line with EBRD PR5 requirements;
  - The process to further manage the grievance if the external stakeholder is unhappy with the resolution and/or does not agree with the proposed actions; and
  - Reporting and storing of grievances.
- Regarding the recording of other external communications, which will not be considered within the scope of the Grievance Mechanism, an “External Communication Register” will be maintained.
- Any important information gathered by the Management Representative shall be communicated to relevant ADC employees and, as appropriate, to the relevant contractors.
- A summary of external communication issues shall be relayed to Top Management at the periodic Management Review Meetings.
- The ESMS Team shall be responsible for providing Environmental and Social Policy to the external parties as requested, in writing and/or verbally, in languages understandable by the local population.
- The Environmental and Social Policy shall be made available to public, in languages understandable by the local population.

6.0 Records

Record Description	Record Location/Retention Responsibility	Minimum Retention Time
Internal Communication Register		
External Communication Register		
Grievance Register Mechanism Related Forms		

7.0 Changes to the Procedure

Version	Reason for Change	Date

1.0 Purpose

The purpose of this procedure is to ensure that any person(s) performing tasks for Anaklia Port Development Project on behalf of ADC (either internal staff or contractors) is competent to perform the task and have appropriate education, training and experience. The procedure should also ensure that records are regularly reviewed and maintained.

2.0 Scope

This procedure is applicable to all activities and services of ADC and is relevant to all employees of ADC and its contractors.

3.0 Responsibility

The responsible persons for the implementation of this procedure and their roles will be described in this Section.

4.0 Definitions

ESMS terminology used in this procedure will be described in this Section.
Refer to ISO 14001: 2015.

5.0 Procedure

ADC will develop a procedure and will consider the following:

- ADC shall appoint a responsible person for coordinating training and maintaining training/competency records. This person will prepare a training plan for all employees. Training programme shall include the periodic refresher training courses as well.
- ADC shall require employees/contractors to undertake a general awareness training course for all persons performing tasks on Anaklia Port Development Project for ADC or on its behalf. Such persons shall be required to complete the training before they start any work activities. The training may focus on the followings:
  - The importance of conformity with the Environmental and Social Policy, Corporate Social Responsibility Strategy and ESMS documents;
  - The significant environmental and social aspects and related actual or potential impacts/risks associated with their work, and the benefits of improved personal performance;
  - Roles and responsibilities in achieving conformity with the requirements of ESMS; and
  - The potential consequences of departure from specific procedures.
- The training format (including frequency, delivery methods and topics) of general awareness training will be defined in the procedure.
- All contractors shall be made aware of the ESMS requirements prior to award of the contract.
- Other specific training requirements (i.e. training that are required to achieve competency in the position) and relevant training format (including frequency, delivery methods and topics) will be identified in the procedure.
- The procedure will also determine criteria for staff to attend refresher training.

- The EHS Team of ADC shall plan and undertake regular audits and site inspections to verify the competencies of internal staff and third parties.
- The training needs of staff shall be reviewed at each Management Review Meeting to ensure that all staff feel confident in performing the tasks given and are able to conduct them safely without putting themselves or another staff in danger or damage equipment or create unnecessary environmental or social risks/damages. An analysis of training needs will be conducted (for e.g. by looking at the incident records). The results of the training need analysis shall be documented by the responsible person appointed by ADC.
- All records of training/competency shall be maintained as per the "Control of Documented Information Procedure".

6.0 Records

Record Description	Record Location/Retention Responsibility	Minimum Retention Time
Training/Competence Records		
The Results of Training Needs Analysis		
Incident Records (inc. near miss)		

7.0 Changes to the Procedure

Version	Reason for Change	Date

	Prepared by	Reviewed by	Approved by
Signature			
Name			
Designation			
Date			

1.0 Purpose

The purpose of this procedure is to establish and maintain an effective and systematic control of all internal and external documented information that concerns and affects the implementation of ESMS of the Anaklia Port Development Project carried out by ADC to demonstrate compliance with ISO 14001:2015 requirements.

2.0 Scope

This procedure is applicable to all ESMS documents, data and records generated during the ESMS implementation in line with ISO 14001: 2015 requirements.

3.0 Responsibility

The responsible persons for the implementation of this procedure and their roles will be described in this Section.

4.0 Definitions

ESMS terminology used in this procedure will be described in this Section.
Refer to ISO 14001: 2015.

5.0 Procedure

ADC should consider the following when developing the procedure:

- While creating and updating all documented information required as a part of the ESMS, ADC shall ensure appropriate:
  - identification and description (e.g. a title, date, author, or reference number);
  - format (e.g. language, software version, graphics) and media (e.g. paper, electronic); and
  - review and approval for suitability and adequacy (e.g. revision number and date).
- Documented information shall be controlled to ensure:
  - it is available and suitable for use, where and when it is needed; and
  - it is adequately protected (e.g. from loss of confidentiality, improper use, or loss of integrity).
- The procedure should demonstrate that ADC:
  - maintain the documented information as a result of the ESMS implementation (including how documented information will be identified and stored);
  - distribute, access and use documented information;
  - protect documented information so these can be retrieved as necessary, for the correct amount of time, and destroyed when these are no longer needed but not before;
  - approve, update and re-approve documented information;
  - identify changes and make sure that people who need current documented information have it and stop using older documented information;
  - make sure documented information can be read; and
  - undertake control of documented information comes from outside the organisation.

	Prepared by	Reviewed by	Approved by
Signature			
Name			
Designation			
Date			

6.0 Records

Record Description	Record Location/Retention Responsibility	Minimum Retention Time
List of Documents and Owners		
Templates of the Documents		

7.0 Changes to the Procedure

Version	Reason for Change	Date

	Prepared by	Reviewed by	Approved by
Signature			
Name			
Designation			
Date			

1.0 Purpose

This procedure describes ADC Emergency Preparedness and Response Procedure for potential accidents and emergency situations that may occur at the Project site location during ADC construction and operation activities. It also describes the communication strategy of ADC and the relevant documentation to be used (or to refer to) in case of accidents or emergency situations.

2.0 Scope

This procedure applies to the Project location and also activities/services carried out by ADC and its contractors.

3.0 Responsibility

The responsible persons for the implementation of this procedure and their roles will be described in this Section.

4.0 Definitions

ESMS terminology used in this procedure will be described in this Section.
Refer to ISO 14001: 2015.

5.0 Procedure

ADC will need to consider the following when developing the procedure:

- ADC shall ensure that the procedure - which is applicable to the site office, storage and working areas, and both marine and land base equipment - is followed by all employees and contractors.
- The procedure should identify the potential for and response to environmental accidents and health and safety emergency situations that may arise at Project sites (including associated facilities), and define who will be responsible for the response and what equipment / resources will be required to intervene.
- The procedure should comprise specific plans and procedures to manage the potential accidents and emergency situations identified as well as prevention and mitigation measures to address potentially adverse environmental and social impacts/risks that may be associated with them.
- ADC shall review and revise its emergency preparedness and response plans and procedures, in particular after the occurrence of accidents or emergency situations.
- ADC should periodically test the procedure and the preparedness where practicable of its employees and contractors.

6.0 Records

Record Description	Record Location/Retention Responsibility	Minimum Retention Time
Emergency Response Plan and associated plans and procedures and relevant records (such as drill records)		

7.0 Changes to the Procedure

Version	Reason for Change	Date

	Prepared by	Reviewed by	Approved by
Signature			
Name			
Designation			
Date			

1.0 Purpose

The purpose of this procedure is to provide ADC with the appropriate response guidelines that should be implemented in the event of chance discovery of heritage resources.

2.0 Scope

This procedure applies to all the location where ADC and contractors conduct activities and services for the construction and operation of the Project. This also considers the Project associated facilities.

3.0 Responsibility

The responsible persons for the implementation of this procedure and their roles will be described in this Section.

4.0 Definitions

ESMS terminology used in this procedure will be described in this Section.
Refer to ISO 14001: 2015.

5.0 Cultural Heritage Management Policy

ADC shall ensure that Cultural Heritage Management Policy is prepared and sets the principles and provisions for protecting the unknown cultural heritage.

6.0 Procedure

ADC shall develop a Cultural Heritage Chance Finds Procedure and consider the following:

- ADC should require all subcontractors to implement the Cultural Heritage Chance Finds Procedure as part of the environmental and social management of the landside and marine construction works. In line with GIP, the Chance Find Procedure should include:
    - Briefing the construction site personnel on the types of cultural heritage and archaeological resources that may be found on the land or in the seabed, and the actions to take under the Chance Find Procedure.
    - Ceasing works and protecting the areas of the chance find to avoid further disturbance and/or damage (e.g. but installing fencing and signage.
    - Notifying the National Museum of Georgia's CAS of any chance finds.
    - Commencing works after it has been examined and cleared by qualified archaeologists in accordance with Georgian legislation.
- ADC shall review and revise its Cultural Heritage Chance Finds Procedure, in particular after any chance find.
- ADC will periodically test the procedure where practicable of its employees and contractors.

7.0 Records

Record Description	Record Location/Retention Responsibility	Minimum Retention Time
Cultural Heritage Chance Finds Procedure		

8.0 Changes to the Procedure

Version	Reason for Change	Date

	Prepared by	Reviewed by	Approved by
Signature			
Name			
Designation			
Date			

1.0 Purpose

This procedure aims to describe systematic practices to be implemented to:

- monitor and measure the key operations related to significant environmental and social aspects and ESMS performance;
- evaluate compliance against relevant legal environmental and social requirements; and
- manage actual and potential nonconformity.

2.0 Scope

This procedure applies to all services and activities of ADC and its contractors which can have significant environmental and social impacts/risks on the physical, biological and human environment.

3.0 Responsibility

The responsible persons for the implementation of this procedure and their roles will be described in this Section.

4.0 Definitions

ESMS terminology used in this procedure will be described in this Section.
Refer to ISO 14001: 2015.

5.0 Procedure

ADC shall consider the following when developing the procedure:

- The procedure will provide a methodology to determine:
  - what needs to be monitored and measured;
  - the criteria and indicators against which the organization will evaluate its environmental and social performance;
  - when the monitoring and measuring shall be performed; and
  - when the results from monitoring and measurement shall be analysed and evaluated.
- ADC shall ensure that the monitoring requirements are carried out and that the procedure includes a process to report the non-conformities detected by monitoring/measurement to the relevant responsible persons.
- ADC shall ensure that environmental and social monitoring and measuring equipment are calibrated, verified and maintained and their records are retained.
- Periodic compliance audits shall be conducted to evaluate the performance and the effectiveness of the ESMS and the procedure will refer to the “Internal Audit Procedure”.

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Signature			
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Designation			
Date			

- ADC shall:

  - determine the frequency of compliance evaluation;

  - evaluate compliance and take action, if needed; and

  - maintain knowledge and understanding of its compliance status.

- ADC shall communicate both internally and externally relevant ESMS performance information, as identified in its communication procedure in line with legal obligations and other requirements.

- Both construction and operation contractor(s) shall develop specific procedures to control the implementation of mitigation and monitoring measures. Each of the mitigation and monitoring measures will have a control procedure that will specify methods, best management practices, roles, responsibilities, monitoring frequency, and record keeping to avoid or reduce the impacts. The control procedures will make reference, where relevant, to best practice documents or guidance. These will describe in more details how to avoid or minimise adverse impacts identified in the EIA/ESIA of the Project.

- The organisation shall retain documented information as evidence of the compliance evaluation result(s) as per the “Control of Documented Information Procedure”.

6.0 Records

Record Description	Record Location/Retention Responsibility	Minimum Retention Time
Evidence of the compliance evaluation records		

7.0 Changes to the Procedure

Version	Reason for Change	Date

	Prepared by	Reviewed by	Approved by
Signature			
Name			
Designation			
Date			

1.0 Purpose

This procedure outlines the responsibilities and methods for identifying causes of nonconformities in the ESMS, how to initiate corrective action(s), and perform follow-up actions to ensure that those corrective action(s) have been effective in eliminating the nonconformities.

2.0 Scope

This procedure applies to all ESMS nonconformities, whether identified during Internal Audits or Management Reviews or by other means of communication (e.g. reported by contractors or other stakeholders).

3.0 Responsibility

The responsible persons for the implementation of this procedure and their roles will be described in this Section.

4.0 Definitions

ESMS terminology used in this procedure will be described in this Section.
Refer to ISO 14001: 2015.

5.0 Procedure

ADC should consider the following when developing the procedure:

- The approach and methods (routine inspection, monitoring, audit findings, trend analysis, employee comments, complaints and experience etc.) for identifying actual and potential non-conformities.
- The recording and reporting requirements upon discovery of an actual and potential non-conformity.
- Investigation of detected non-conformity, identification causes of detected non-conformity, evaluation of the need for corrective actions and controls which are in place to ensure that the non-conformity is addressed.
- Corrective actions shall be defined and implemented to eliminate causes of non-conformities or other unintended situations so as to avoid recurrence of those problems.
- Monitoring and verification methods to be used for evaluation of the effectiveness of the corrective actions and further actions to be taken in case of judged non-effective.
- The methods for the communication of corrective actions.
- The methods for closing of corrective actions.
- ADC shall keep the records of activities related to non-conformities and corrective actions as per “Control of Documented Information Procedure”.

6.0 Records

Record Description	Record Location/Retention Responsibility	Minimum Retention Time
Non-conformity records		
Verification and results of any corrective action		

7.0 Changes to the Procedure

Version	Reason for Change	Date

	Prepared by	Reviewed by	Approved by
Signature			
Name			
Designation			
Date			

1.0 Purpose

The purpose of this procedure is to establish, implement, document and maintain systematic practices to conduct periodic internal audits against ISO 14001:2015 requirements. It also establishes an internal audit programme.

2.0 Scope

This procedure applies to internal ESMS audits to be conducted by ADC during the implementation of the Anaklia Port Development Project.

3.0 Responsibility

The responsible persons for the implementation of this procedure and their roles will be described in this Section.

4.0 Definitions

ESMS terminology used in this procedure will be described in this Section.
Refer to ISO 14001: 2015.

5.0 Procedure

ADC should consider the following when developing the procedure:

- ADC shall conduct internal audits at planned intervals to provide information on whether:

  - the ESMS is compliant with the Project's requirements and ISO 14001: 2015; and

  - the ESMS is effectively implemented and maintained.

- ADC shall establish and maintain an internal audit programme which will cover all processes described in the ESMS. Additional internal audits on projects or particular processes may be arranged and executed at any time by the responsible persons at ADC. Internal audit programme shall also specify timeframe of each audit.
- Internal audit programme shall be documented as per the "Control of Documented Information Procedure".
- When establishing the internal audit programme, ADC shall take into consideration the environmental and social importance of the processes concerned, changes affecting the organization and the results of previous audits.
- Audit criteria and scope for each audit will be identified in the procedure.
- An accredited internal auditor shall be assigned for each audit. Internal auditor requirements will be identified in the procedure (at least, they have to obtain internal auditor certificate). While assigning internal auditors and conducting internal audits, the audit process shall remain objective and impartial.
- The internal auditor shall undertake each audit in accordance with the defined scope, audit criteria and schedule.
- The internal auditor shall classify findings in line with ISO 14001:2015 (Section 10.2 Nonconformity and Corrective Action). Additionally, the methodology to be applied for following up and addressing corrective actions noted in the audit will be defined in the procedure.

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Signature			
Name			
Designation			
Date			

- The methodology to be applied for reporting of internal audit results will be identified in the procedure.
- The persons who will report the results of the internal audit will be defined in the procedure. This shall ensure that the results of the audits are communicated to relevant management staff at ADC.

6.0 Records

Record Description	Record Location/Retention Responsibility	Minimum Retention Time
List of Internal Auditors		
Internal Audit Programme		
Internal Audit Report Template and Report		

7.0 Changes to the Procedure

Version	Reason for Change	Date

1.0 Purpose

The purpose of this procedure is to establish, implement and maintain systematic practices for conducting Management Review of the ESMS.

2.0 Scope

This procedure is applicable to all elements of the ESMS established by ADC.

3.0 Responsibility

The responsible persons for the implementation of this procedure and their roles will be described in this Section.

4.0 Definitions

ESMS terminology used in this procedure will be described in this Section.
Refer to ISO 14001: 2015.

5.0 Procedure

ADC should consider the following when developing the procedure:

- The ESMS Management Review Meeting should be conducted at least once a year. The ESMS Management Representative should chair the meeting and the ESMS Responsible Person should coordinate the organisation of the Management Review Meeting by defining the agenda, date and time.
- The ESMS Management Review Meeting should discuss the suitability, adequacy and effectiveness of the ESMS. This can include for e.g.:
  - Status of previous actions from former Management Review Meetings;
  - Changes in internal/external issues, significant aspects/impacts and compliance obligations, risks and opportunities;
  - Achievement and progress on environmental and social objectives;
  - ESMS performance;
  - Concerns, relevant communication from interested parties (both internal and external);
  - Adequacy of resources for the ESMS;
  - Results of audits; and
  - Recommendations for improvement.
- Details of the input data required to discuss agenda points will be presented in the procedure.
- The output from Management Review Meetings should include any decisions and actions related to:
  - Conclusions on the suitability, adequacy and effectiveness of the system;
  - Continual improvement opportunities;
  - Changes to the ESMS, including resources;
  - Actions relating to objectives not achieved; and

- Implications for the strategic direction of the organization.

- The Minutes of the Management Review Meetings should be recorded as per the "Control of Documented Information Procedure". Copies should be circulated to all the Management Review Committee members (or attendees) for effective and timely action.
- The outputs from Management Review Meetings should be communicated to all concerned persons/parties.

6.0 Records

Record Description	Record Location/Retention Responsibility	Minimum Retention Time
Minutes of Management Review Meetings		

7.0 Changes to the Procedure

Version	Reason for Change	Date

	Prepared by	Reviewed by	Approved by
Signature			
Name			
Designation			
Date			

1.0 Purpose

The purpose of this procedure is to establish practices related to the development and implementation of operational controls associated with the Anaklia Port Development Project carried out by ADC.

2.0 Scope

Operational Planning and Control Procedures describe work practices and cover the environmental control of specific operational activities. These are activity-specific in their application and can also cover management operations.

These System Procedures cover the management and control of both the ESMS and the principal environmental and social aspects, which the system manages. The present procedure applies to all the processes and activities covered under the scope of ESMS.

3.0 Responsibility

The responsible persons for the implementation of this procedure and their roles will be described in this Section.

4.0 Definitions

ESMS terminology used in this procedure will be described in this Section.
Refer to ISO 14001: 2015.

5.0 Procedure

ADC will need to consider the following when developing the procedure:

- Processes and activities required operational control criteria should be identified by considering a life cycle perspective. Following the identification, these activities and processes, ADC should assess the need to develop and document operational control procedures (e.g. container loading and unloading, handling of hazardous material, working in confined area, etc.).
- “Register of Environmental and Social Aspects and Impacts” becomes the major input for setting of operational control procedures. All significant environmental and social aspects and impacts should be considered for conducting a study on establishment of operational control procedures.
- ADC should decide how to construct and combine processes to ensure that total operational control of its environmental and social aspects is achieved.
- ADC is responsible for all activities and impacts of outsourced providers; hence ADC should ensure that controls for outsourced processes are defined and implemented.
- Operational control procedures are applicable to contractors/suppliers of ADC.
- Operational control procedures should be written in sufficient detail to provide the necessary level of instruction to ensure the desired outcome. Consideration may be given to the experience, education, and / or training of the person(s) who are executing the instructions. A ‘Master List of Operation Control Procedures’ will be maintained and available to all relevant parties.

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Signature			
Name			
Designation			
Date			

- The ESMS Team should review the operational control procedures annually or more frequently if needed, to ensure that the operational control procedures meet ISO 14001:2015.
- ADC should control planned changes and review the consequences of these changes to existing operational control procedures. ADC should take action to mitigate any adverse effects, when identified.
- All documented information pertaining to operational planning and control will follow the "Control of Documented Information Procedure".
- ADC to undertake specific training to communicate about operational planning and control requirements (implementation of procedures). The trainings required will be detailed in the "Competence, Training and Awareness Procedure".

6.0 Records

Record Description	Record Location/Retention Responsibility	Minimum Retention Time
Master List of Operational Control Procedure(s)		

7.0 Changes to the Procedure

Version	Reason for Change	Date

	Prepared by	Reviewed by	Approved by
Signature			
Name			
Designation			
Date			

Appendix D

Terms of Reference and/or Guidance to develop Environmental and Social Management and Monitoring Plans

1. ESP01 Waste Management Plan

1.1. Roles and Responsibilities

ADC will prepare a Waste Management Plan and will be responsible for its implementation. ADC will regularly review the plan as part of the Project's established documented information review process.

1.2. Objective and Scope

The Waste Management Plan will identify the procedures required to deliver an effective, proportionate response to any releases of pollution, including those from at-sea refuelling operations, during the life of the Project.

1.3. Draft Plan Contents

The Waste Management Plan may include the following:

- Introduction
- Scope of Work
- Legislation, Policy, Standard and Guidance
- Consultation
- Objective of a the WMP
- Activities covered by the WMP (current and future)
- Role and Responsibility (including vessels obligations)
- Definition and Abbreviation
- Management of Waste Materials - Sources, Types, Quantity and Management Practises
    - Planning – Permits, notification and procedure
    - Waste Hierarchy
    - Waste categories (MARPOL Annexes)
    - Hazardous Waste
    - Non-hazardous Waste
    - Liquid Waste
    - Transportation – Delivery and Removal
    - Details of facilities and charges
    - Directory of waste disposal agencies/operators.
- Non-Compliance and Corrective Action
- Training
- Monitoring, reporting and recording
- Emergency Response and Contingency

It is a requirement of the Project to adhere to the laws and regulations of Georgia and Good International Industrial Practices (GIIPs). Therefore, the content of the Port Waste Management Plan will ensure that all legal and regulatory requirements are met.

1.4. Plan commitments

Mitigation measures to be implemented by the ADC to minimise possible traffic impacts of the Project will be presented in this Section.

1. ESP02 Beach Management Plan

1.1. Roles and Responsibilities

ADC will prepare a Beach Management Plan (BMP) that establishes a sustainable approach to managing the shoreline (e.g. through intervention measures) in order to meet public and port requirements (e.g. shoreline protection for beach provision, coastal defence for flood prevention and seabed depth for navigation).

1.2. Objective and Scope

The BMP will identify the mitigation and monitoring measures that need to be taken in order to avoid, reduce and/or minimise the possible effects related to the proposed activities during construction and operation in the marine environment and within the coastal areas of Anaklia.

The BMP should cover an area or 'sediment cell' i.e. an identified length of coastline which is relatively self-contained as far as movement of sediment is concerned. The aim of an BMP is to provide a strategic assessment of the risks associated with long term change of the coastal environment and its implication on physical, biological and human coastal receptors. The BMP also identifies the best ways to manage these risks in the long term and who will be responsible for the measures listed in the Action Plan.

1.3. Draft Plan Contents

The BMP may include the following:

- Purpose of this Document;
- Project Area;
- Project Commitments and Coastal Protection Policies in Georgia;
- Environmental Baseline;
- Environmental Assessment;
- Basis for the Plan;
- Management Units, if applicable; and
- Action Plan.

It is a requirement of the Project to adhere to the laws and regulations of Georgia and Good International Industrial Practices (GIIPs). Therefore, the content of the BMP will ensure that all legal and regulatory requirements are met. The BMP will also consider all recommendations provided in the ESIA.

1.4. Plan commitments

The BMP will include an Action Plan which will clearly state the proposed mitigation and monitoring measures to be implemented by ADC, and potential subcontractors, during the Project construction and operation phases. This plan will ensure that the Project's objectives and targets will be met by ADC to manage the potential risk of shoreline changes in the long term.

1. ESP03 Dredging Environmental Management Plan

1.1. Roles and Responsibilities

Depending on the scope of the construction works that is awarded to the successful construction contractors, it may be appropriate to prepare a Dredging Environmental Management Plan (DEMP) instead of, or as part of, a CEMP. Rather than covering general construction works, the DEMP would be focused on dredging and associated works. The DEMP would be prepared by the Contractor and ADC would be responsible for the supervision of this plan with pro-active involvement during its development and implementation.

1.2. Objective and Scope

The DEMP aims to address the predicted impacts relating to the release, dispersion and deposition of sediment during construction works involving dredging, disposal of dredged material and de-watering of the land reclamation area.

1.3. Draft Plan Contents

An indicative scope for the DEMP is provided below:

- Overall management framework describing how the DEMP integrates with the Project's overarching EMS, EIA's recommendations including the EMMP, CEMP, etc.
- Project description providing information on dredging, land reclamation and disposal associated with the Project, including the locations and timing of activities.
- Permitting information providing details of any relevant permits, relevant reference criteria / key performance indicators (e.g. environmental quality standards for water quality), and any other statutory requirements.
- Description of the baseline conditions characterising the area of influence associated with the dredging, land reclamation and disposal, and adjacent areas (e.g. bathing beaches at Anaklia and Kolkheti National Park), including the baseline conditions for marine sediment, water, biodiversity and social uses.
- Description of potential impacts identifying the potential short-term impacts (during construction works) and long-term impacts (post-construction works).
- Management strategies and actions describing the strategies and actions to mitigate impacts, including specific and auditable measures, monitoring requirements corrective actions, and responsibilities, and the timing for management and monitoring activities.
- Contingency arrangements identifying corrective actions and contingency plans should undesirable or unforeseen impacts occur.
- Continuous improvement and adaptive management approaches to prevent, minimise or mitigate the environmental impacts.
- Auditing requirements describing the reporting and documentation standards, timing and responsibility of any auditing or reporting.
- Reviewing of DEMP to ensure it remains current and relevant.

The DEMP will take into consideration the recommendations provided in the ESIA and will also comply with national laws and regulations as well as international regulation related to dredging and disposal of dredged material (i.e. OSPAR and London Convention). The plan should also consider Good International Industrial Practices (GIIPs).

1.4. Plan commitments

The DEMP will include an Action Plan which will clearly state the proposed mitigation and monitoring measures to be implemented by the contractor during capital and maintenance dredging, if applicable. ADC will need to ensure that the Action Plan is implemented in a timely manner and delivers the Project's objectives and targets related to dredging and disposal activities at sea.

1. ESP04 Biodiversity Management Plans

1.1. Roles and Responsibilities

As part of the ESIA commitment, ADC will prepare an overarching Biodiversity Management Plan (BMP) and the following sub-plans (refer as 'associated management plans'):

- An Otter Management Plan;
- A Bat Management Plan;
- A Sensitive Species Management Plan;
- A Marine Mammal Mitigation Plan including UXO clearance; and
- A Biodiversity Offset Management Plan.

ADC can appoint a qualified contracting party to implement it (usually required for such type of plans); however ADC will be responsible for supervising the implementation of these plans/strategies and ensure that the objectives and targets are reached in a timely manner. The BMP and associated management plans/strategies will contribute to deliver the biodiversity objectives of the Project.

1.2. Objective and Scope

The BMP and associated management plans/strategies will identify the mitigation, compensation and monitoring measures that need to be taken in order to avoid, minimise or compensate the possible impacts related to the Project activities during construction and operation. The plans/strategies will cover both terrestrial and marine habitats/species.

The BMP and associated plans/strategies will follow the ESIA recommendations and will need to consider applicable laws and regulations in Georgia as well as international requirements, including EBRD PR6 related to 'Biodiversity Conservation and Sustainable Management of Living Natural Resources'.

These plans/strategies will also need to integrate the recommendations from the Critical Habitat Assessment (CRA) conducted in 2017 by Royal HaskoningDHV.

1.3. Overarching BMP

ADC will need to prepare and implement an overarching BMP which may include the following:

- Context of the overarching BMP;
- Objectives and Targets;
- Project Study Area related to the BMP;
- Project Requirements;
- Habitat and Species of importance identified;
- Proposed mitigation, compensation and monitoring measures (reference to sub-plans);
- Overall programme (combined sub-plans programmes).

The overarching BMP will present ADC's approach to manage biodiversity mitigation, compensation and monitoring as a whole during construction and operation. This plan will make reference to the sub-plans proposed in the ESIA. The content of these plans is presented below.

1.4. Associated Management Plans – Terrestrial species

A number of species management plans are required to address the direct impacts on terrestrial threatened and protected species that could be affected by the Phase 1 port development. These are:

- An Otter Management Plan
- A Bat Management Plan; and
- A Sensitive Species Management Plan.

An indicate content for these plans is provided below.

Otter Management Plan

An Otter Management Plan (OMP) will be prepared to address the predicted impacts relating to the potential losses and/or disturbances to this species and its habitat. An indicative content of the OMP is provided below:

- Objective and Targets of the Plan;
- Scope of the Plan;
- Regulatory framework and international requirements;
- Summary of the evidence review as described in the ESMP and CHA;
- Description of mitigation measures;
- Species Specific Method Statement when working in the areas where resting site are located;
- Proposed work measures to ensure that the mitigation measures are implemented successfully during the port's construction;
- Programme, timing and frequency of site surveys and suggested survey techniques;
- Post-construction monitoring requirements;
- Overall Programme of the OMP; and
- Reporting requirements.

Bat Management Plan

A Bat Management Plan (BMP) will be prepared to address the predicted impacts relating to the potential losses and/or disturbances to three bat species and their habitats. An indicative content of the BMP is provided below:

- Objective and Targets of the Plan;
- Scope of the Plan;
- Regulatory framework and international requirements;
- Summary of the evidence review to identify the habitats (including roosting sites and foraging areas) suitable for supporting bats as described in the ESMP and CHA;
- Description of mitigation measures;
- Species Specific Method Statement;
- Proposed work measures to ensure that the mitigation measures are implemented successfully during the port's construction;
- Programme, timing and frequency of site surveys and suggested survey techniques;
- Post-construction monitoring requirements;
- Overall Programme of the BMP; and
- Reporting requirements.

Sensitive Species Management Plan

A Sensitive Species Management Plan (SSMP) will be prepared to address the predicted impacts relating to the potential losses and/or disturbances to various species and their habitats. An indicative content of the SSMP is provided below:

- Objective and Targets of the Plan;
- Scope of the Plan;
- Regulatory framework and international requirements;
- Summary of the evidence review to identify the habitats suitable for supporting sensitive species as described in the ESMP and CHA;
- Description of mitigation measures;
- Species Specific Method Statement;
- Proposed work measures to ensure that the mitigation measures are implemented successfully during the port's construction;
- Programme, timing and frequency of site surveys and suggested survey techniques;
- Post-construction monitoring requirements;
- Overall Programme of the SSMP; and
- Reporting requirements.

1.5. Associated Management Plans – Marine Species

The ESIA has also identified the need to develop a Plan which details specific risk prevention measures for marine mammals. An indicative content of this management plan is provided below.

Marine Mammal Risk Prevention Measures

An indicative content of this Plan is provided below:

- Objective and Targets of the Plan;
- Scope of the Plan;
- Description of the mitigation measure for activities covered by this plan i.e. Mammal Risk Prevention Measures based on Good Industry Practice (GIP) for:
    - Underwater Noise Generation due to Detonations of UXO; and
    - Underwater Noise Generation during Piling Works. The Plan should provide the following:
- Responsible parties (number, qualifications, standards used, etc.)
    - ADC;
    - Contractor (e.g. UXO or piling);
    - Marine Mammal Observers (MMOs);
    - Passive Acoustic Monitoring (PAM).
- Underwater works methodology (e.g. UXO, Piling);
- Monitoring Methodology;
    - Visual watch by MMOs;
    - PAM.
- Use of Acoustic Deterrent Devices (ADDs).
- Overall Programme (who, what, how and when);
- Reporting requirements.

We recommend using the information that is provided in the relevant section of the ESIA and in the ESMP to develop further this Plan.

1.6. Biodiversity Offsetting Management Plan

The CHA Report (RHDHV, 2017) sets out the biodiversity offsetting strategy for compensating for the direct loss of the swamp forest, and drainage channels, and wetland supporting Colchis water chestnut (*Trapa colchica*).

The proposed contents of the Biodiversity Offsetting Management Plan (BOMP) for these habitats are presented below. The CHA and ESIA Reports provide more detailed information about the approach to develop BOMP.

It is recommended that the BOMP is based on GIP in the form of internationally recognized guidance, such as the following guidance published by the Biodiversity Offsets Programme (BBOP):

- *Biodiversity Offset Design Handbook* (BBOP, 2012).
- *Biodiversity Offset Implementation Handbook* (BBOP, 2009).

Biodiversity Offsetting Management Plan– Site Selection

The biodiversity offset sites for wetland and swamped forest will be selected by ADC in consultation with stakeholders such as the MoENRP and the Kolkheti National Park. The offset sites will be sited outside of the Investment Area and outside of the Kolkheti National Park, but will be connected ecologically with the equivalent habitats within the Kolkheti National Park.

An indicative content of the site selection report is provided below:

- Identification of the Proposed Offsetting Areas based on the consultation with ADC and stakeholders
- Identification of the preferred option.

Biodiversity Offsetting Management Plan for *Trapa colchica* Habitat (Drainage Channels and Wetland)

- Background;
- Objective and Scope of the Document;
- Habitats
    - Surveys; and
    - Habitat Descriptions.
- Offset requirements for the Project – including:
    - Environmental impacts;
    - Proposed Offsetting Areas.
- Biodiversity Offsetting:
    - Approach and Guidance;
    - Biodiversity Offsetting Assessment; and
    - Offsets measures proposed.
- Specific Method Statement;
- Proposed work measures to ensure that the mitigation measures are implemented successfully during the port's construction;
- Climate change resilience;
- Post-construction monitoring and evaluation requirements;
- Overall Programme of the BOMP; and
- Reporting requirements.

Biodiversity Offsetting Management Plan for Swamped Forest

- Background;
- Objective and Scope of the Document;
- Habitats

    - Surveys; and
    - Habitat Descriptions.
- Offset requirements for the Project – including:
    - Environmental impacts;
    - Proposed Offsetting Areas.
- Biodiversity Offsetting:
    - Approach and Guidance;
    - Biodiversity Offsetting Assessment; and
    - Offsets measures proposed.
- Specific Method Statement;
- Proposed work measures to ensure that the mitigation measures are implemented successfully during the port's construction;
- Climate change resilience;
- Post-construction monitoring and evaluation requirements;
- Overall Programme of the BOMP; and
- Reporting requirements.

1.7. Plans/Strategies commitments

The plans/strategies will detail ADC's commitments for the Project. The plans/strategies will gather the proposed mitigation, compensation and/or monitoring measures, state who will be the responsible for the implementation of these measures, and when these should be completed. A detailed programme will be developed for each plan.

ADC may report its environmental performance and initiatives in its CSR reporting and ESAP reporting to lenders (i.e. EBRD), if applicable.

1. ESP05 Emergency Response Plan

1.1. Roles and Responsibilities

ADC will prepare an Emergency Response Plan (ERP) and will be responsible for its implementation. ADC will regularly review the plan as part of the Project's established documented information review process.

1.2. Objective and Scope

The ERP will identify the specific procedures required to respond to an accident or an emergency situation during the life of the Project. The ERP should include site-specific details that are unique to ADC activities/infrastructures. This plan includes vessel or land-sourced incidents that may impact economic and/or environmental resources.

1.3. Draft Plan Contents

The ERP may include the following:

- Determine the likelihood of an incident occurring;
- Assess probable consequences;
- Identify sensitive resources/potential pollutant pathways and scenarios;
- Assess plan parameters;
- Develop plan overview;
- Response techniques;
- Resources;
- Command;
- Incident notification and evaluation;
- Response initiation;
- Mobilisation;
- Support and logistics;
- Environmental monitoring strategies;
- Termination;
- Plan review;
- References;
- Document templates;

It is a requirement of the Project to adhere to the laws and regulations of Georgia and Good International Industrial Practices (GIIPs). Therefore, the content of the ERP will ensure that all legal and regulatory requirements are met.

1.4. Plan commitments

Mitigation measures to be implemented by ADC to minimise possible environmental impacts of the Project will be presented in this Section. Separate emergency response plans for events such as oil spills may be required within the Project, these will sit under a wider emergency response framework.

1. ESP06 Drainage /Stormwater Management Plan

1.1. Roles and Responsibilities

ADC will prepare a Drainage / Stormwater Management Plan and will be responsible of its implementation. ADC will regularly review Drainage / Stormwater Management Plan as part of the Project's established documented information review process.

1.2. Objective and Scope

The Drainage / Stormwater Management Plan will detail how the Project will manage runoff water such as flooding from sewers, drains, groundwater, and runoff from land, small watercourses and ditches that occur as a result of rainfall (including extreme weather conditions) and related mitigation measures.

The Drainage / Stormwater Management Plan will also identify options to reduce local flooding and include a realistic action plan to implement or deliver the identified mitigation measures.

1.3. Draft Plan Contents

The Drainage / Stormwater Management Plan may include the following:

- a summary of existing information relevant to the current management of drainage / stormwater at Anaklia during both construction and operation;
- specific objectives for management of runoff water during flooding events including extreme weather conditions;
- potential management strategies that may be used to meet the identified management objectives;
- monitoring of the drainage system and treatment plant efficiency;
- water quality analysis and monitoring;
- roles and responsibilities of appointed staff in charge of the implementation of this plan; and
- all necessary permits related to planned drainage/stormwater management actions (if needed by the Georgian legislations).

It is a requirement of the Project to adhere to the laws and regulations of Georgia, Good International Industrial Practices (GIIPs) and relevant international standards. Therefore, the content of the Drainage / Stormwater Management Plan will ensure that all legal and regulatory requirements are met.

1.4. Plan Commitments

This plan will describe mitigation measures to be implemented by ADC in order to reduce and improve the quality of water from drainage / stormwater runoff at the Port of Anaklia. It will also present a realistic action plan to implement / deliver the proposed mitigation measures.

1. ESP07 Lighting Management Plan

1.1. Roles and Responsibilities

ADC will prepare a Lighting Management Plan (LMP) and will be responsible of its implementation. ADC will regularly review Lighting Management Plan as part of the Project's established documented information review process.

1.2. Objective and Scope

The Lighting Management Plan will identify the mitigation measures that need to be taken in order to minimise the disturbance of the environmental and social receptors that may be sensitive to artificial lighting during construction and operation phases of the Project.

1.3. Draft Plan Contents

The Lighting Management Plan may include the following:

- Identification and location of receptors sensitive to light;
- all potential light sources and their impacts upon receptors in the vicinity of the Project activities;
- proposed mitigation measures (embedded and additional);
- light emissions monitoring;
- roles and responsibilities of appointed staff in charge of the implementation of this plan; and
- all necessary permits related to artificial lighting (if needed by the Georgian legislations).

It is a requirement of the Project to adhere to the laws and regulations of Georgia, Good International Industrial Practices (GIIPs) and relevant international standards. Therefore, the content of the Lighting Management Plan will ensure that all legal and regulatory requirements are met.

1.4. Plan Commitments

This plan will present mitigation measures to be implemented by the ADC to minimise disturbance of receptors sensitive to artificial lighting.

1. ESP08 Traffic Management Plan and associated plans

1.1. Roles and Responsibilities

ADC will prepare a Traffic Management Plan and will be responsible of its implementation. ADC will regularly review Traffic Management Plan as part of the Project's established documented information review process.

1.2. Objective and Scope

The Traffic Management Plan will identify the mitigation measures that need to be taken in order to minimise the possible impacts of related to traffic, due to Project activities, on existing infrastructures and sensitive receptors. This includes land-based activities and marine traffic movements.

1.3. Draft Plan Contents

The Traffic Management Plan for land-based activities may include the following:

- construction and operation traffic flow and site entrances;
- traffic control and management;
- road crossings and cross roads/junctions;
- parking areas;
- signage and barriers, speed limits;
- transportation of workforce;
- designated access routes and traffic flow to and from construction site;
- maintenance of roadways (including debris, dust, mud control);
- vehicle standards and maintenance;
- training for drivers and workers;
- monitoring of traffic;
- any deficiencies in the existing local infrastructure and develop upgrading plans;
- site specific mitigations to control traffic/ labour safety/ community safety/ impacts to environmentally sensitive areas defined by the EIA study;
- roles accountable for implementation of this plan; and
- all necessary traffic related permits from the authorities (if needed by the Georgian legislations).

A specific management plan should be prepared for marine traffic movement and navigation during both construction and operation.

It is a requirement of the Project to adhere to the laws and regulations of Georgia, Good International Industrial Practices (GIIPs) and relevant international standards. Therefore, the content of the Traffic Management Plan and sub-management plans will ensure that all legal and regulatory requirements are met. These will also consider the ESIA recommendation.

1.4. Plan Commitments

This plan will describe the mitigation measures to be implemented by ADC and its contractors to minimise possible traffic and navigation impacts of the Project on infrastructures/receptors during both construction and operation.

1. ESP09 Noise Management Plan

1.1. Roles and Responsibilities

ADC will prepare a Noise Management Plan and will be responsible of its implementation. ADC will regularly review Noise Management Plan as part of the Project's established documented information review process.

1.2. Objective and Scope

The Noise Management Plan will detail noise management strategies that will be implemented by ADC and contractors. The aim of this document is to ensure that noise emissions are managed and noise limits enforced at all times during the construction and the operation phases of the Project.

1.3. Draft Plan Contents

The Noise Management Plan may include the following:

- baseline noise level measurements;
- potentially affected receptors;
- reference criteria (including legal requirements);
- hours of construction/operation;
- noise level predictions based on noise modelling studies;
- potential noise sources and their impacts upon receptors in the vicinity of the Project activities;
- proposed mitigation measures;
- noise monitoring strategy and programme;
- roles and responsibilities of appointed staff in charge of the implementation of this plan; and
- all necessary permits related to noise management actions from the authorities (if needed by Georgian legislations).

It is a requirement of the Project to adhere to the laws and regulations of Georgia, Good International Industrial Practices (GIIPs) and relevant international standards. Therefore, the content of the Noise Management Plan will ensure that all legal and regulatory requirements are met.

1.4. Plan Commitments

This plan will describe mitigation measures to be implemented by ADC and its contractors to minimise potential noise emissions of the Project and subsequent impact on sensitive receptors during both construction and operation.

1. ESP10 Air Quality Management Plan

1.1. Roles and Responsibilities

ADC will prepare an Air Quality and Dust Management Plan and will be responsible of its implementation. ADC will regularly review the Air Quality and Dust Management Plan as part of the Project's established documented information review process.

1.2. Objective and Scope

The Air Quality and Dust Management Plan will set out the measures that will be undertaken by ADC and contractors during the construction phase and the operation phase to mitigate adverse impacts of the Project on air quality and also ensure that the Project is compliant at all time with legal requirements and WHO limits for air quality.

1.3. Draft Plan Contents

The Air Quality and Dust Management Plan may include the following:

- baseline air quality measurements;
- potentially affected receptors (including legal and regulatory requirements);
- reference criteria;
- the likely dust generation activities;
- air emissions level predictions based on air quality modelling studies;
- potential emission sources and their types, usage periods (e.g. 24 hours or discrete) and their impacts upon receptors in the vicinity of the Project activities;
- the main principles for preventing dust emissions;
- proposed mitigation measures (including those detailed in the ESIA);
- air quality and dust monitoring programme;
- roles and responsibilities of appointed staff in charge of the implementation of this plan; and
- all necessary permits related to air quality and dust management actions from the authorities (if needed by Georgian legislations).

It is a requirement of the Project to adhere to the laws and regulations of Georgia, Good International Industrial Practices (GIIPs) and relevant international standards. Therefore, the content of the Air Quality and Dust Management Plan will ensure that all legal and regulatory requirements are met.

1.4. Plan Commitments

This plan will describe mitigation measures to be implemented by ADC and its contractors to minimise potential emissions to air and dust, and their subsequent impacts on sensitive receptors in the vicinity of the Project activities.

1. ESP11 Chemical Handling Management Plan

1.1. Roles and Responsibilities

ADC will prepare a Chemical Handling Management Plan and will be responsible of its implementation. ADC will regularly review Chemical Handling Management Plan as part of the Project's established documented information review process.

1.2. Objective and Scope

Chemical Handling Management Plan aims to identify the potential direct and indirect impacts of handling and storage of chemical products during construction and operation. This procedure establishes the management measures to minimise the potential environmental impacts associated with chemical transport, storage, handling and disposal.

1.3. Draft Plan Contents

Chemical Handling Management Plan may include the following:

- relevant legislation and regulatory framework;
- roles and responsibilities of appointed staff in charge of the implementation of this Plan;
- the key activities to be undertaken by ADC and its contractors that involve the transport, storage, handling and disposal of chemicals that have the potential to impact on the physical and social environment and occupational health and safety of employees;
- the potential direct and indirect impacts/risks associated with chemical and management which may arise from ADC's and its contractors' activities;
- proposed mitigation measures and management objectives/targets;
- monitoring compliance with this Plan and site specific management and monitoring programs;
- specific management and monitoring program;
- all necessary permits/approvals related to handling and storage of chemicals, as required by the authorities; and
- corrective actions if the monitoring indicates that the management objectives are not being achieved.

It is a requirement of the Project to adhere to the laws and regulations of Georgia, Good International Industrial Practices (GIIPs) and relevant international standards, as outlined in the ESIA. Therefore, the content of the Chemical Handling Management Plan will ensure that all legal and regulatory requirements are met.

1.4. Plan Commitments

This plan will describe mitigation measures to be implemented by ADC and its contractors to minimise potential impacts or risks associated with handling and storage of chemical products. This plan should be revised regularly as the Project evolves and be kept up to date.

1. ESP13 Community and Occupational Health and Safety Management Plan

1.1. Roles and Responsibilities

ADC will prepare a Community and Occupational Health and Safety Management Plan and will be responsible of its implementation. ADC will regularly review the Community and Occupational Health and Safety Management Plan as part of the Project's established documented information review process.

1.2. Objective and Scope

The Community and Occupational Health and Safety Management Plan will set out a formal system by which ADC can manage and implement mitigation measures that will avoid or reduce the significance of impacts related to community health and safety, and also worker's occupational health and safety management.

1.3. Draft Plan Contents

The Community and Occupational Health and Safety Management Plan may include the following:

- identification and assessment of Project-related risks and adverse impacts to health and safety of the potentially affected communities;
- identification of health and safety risks and implementation of protection measures appropriate to the stage, size and nature of the Project, in line with legal requirements, Occupational Health and Safety Standards and GIIP;
- development of protection, prevention and mitigation measures proportionate to the impacts and risks to community and occupational health and safety;
- cooperation strategies with the relevant authorities and other stakeholders;
- clear definition of roles and responsibilities between ADC, contractors and external stakeholders;
- Project-specific health and safety plan;
- appropriate supervision to ensure adequate implementation, maintenance and enforcement of the health and safety measures;
- monitoring of workers' health;
- roles accountable for implementation of this plan; and
- risk assessment procedures where specific risks are identified with certain work activities.

It is a requirement of the Project to adhere to the laws and regulations of Georgia, Good International Industrial Practices (GIIPs) and relevant international standards. Therefore, the content of the Community and Occupational Health and Safety Management Plan will ensure that all legal and regulatory requirements are met.

1.4. Plan Commitments

This plan will describe mitigation measures to be implemented by ADC and its contractors to minimise potential impacts of the Project on community and occupational health and safety.

1. ESP14 Groundwater Monitoring Plan

1.1. Roles and Responsibilities

ADC will prepare a Groundwater Monitoring Plan to implement during the construction phase of the proposed development. ADC will be responsible for regularly reviewing the Groundwater Monitoring Plan as part of the Project's established documented information review process.

1.2. Objective and Scope

The Groundwater Monitoring Plan aims to ensure that the environmental quality of groundwater is not altered due to the project development activities. This includes ensuring that groundwater, which is and can be used by locals for domestic purposes, is assessed in accordance with the drinking water quality parameters. The Groundwater Monitoring Plan will define the locations of additional permanent and temporary monitoring wells and the groundwater characteristics to be analysed throughout the construction and operation of the development.

1.3. Draft Plan Contents

Groundwater Monitoring Plan may include the following:

- international guidance and examples of Good International/Industry Practice;
- roles and responsibilities of appointed staff in charge of the implementation of this Plan;
- key activities to be undertaken by ADC and its contractors that involve the monitoring of groundwater in area that has the potential to impact the environment and domestic use;
- the potential direct and indirect impacts/risks associated with groundwater contamination and alteration;
- proposed mitigation measures and monitoring objectives/targets;
- specific monitoring programme clearly describing the location of permanent and temporary monitoring wells and the frequency of sample collections;
- the necessary permits/approvals required by the authorities relevant to the monitoring of groundwater; and
- recommendations for the preparation of monitoring and interpretive reports.

It is a requirement of the Project to adhere to the laws and regulations of Georgia, Good International/Industry Practices (GIPs) and relevant international standards, as outlined in the ESIA. Therefore, the content of the Groundwater Monitoring Plan will ensure that all legal and regulatory requirements are met.

1.4. Plan Commitments

This Groundwater Monitoring Plan will set out procedures to be implemented during the construction and operation of the Project in relation to monitoring the groundwater for any biological, chemical or physical alteration as a result of the development. If implemented, the Plan commits to reducing the both environmental and social risks arising from changes to groundwater. This Plan should be revised regularly as the Project evolves and be kept up to date.