

# FINAL REPORT

ON THE IMPLEMENTATION OF MEASURES SPECIFIED IN THE ENVIRONMENTAL  
MANAGEMENT PLAN  
FOR CONTRACT 1B.4/2

Odra–Vistula Flood Management Project

Subcomponent	1B Flood protection of the Lower and Middle Odra
Contract Task	Dredging of the Klucz – Ustowo Ditch Contract 1B.4/2
Investor /Project Implementation Unit	State Water Management Polish Waters in Warsaw represented by the Director of the Regional Water Management Authority in Szczecin
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## INTRODUCTION

The final report on the implementation of measures specified in the Environmental Management Plan describes the status of the implementation of mitigation and monitoring measures for Contract 1B.4/2 throughout the duration of the Contract.

For this Contract, the following are presented, respectively:

- basic information about Contract 1B.4/2 (including, but not limited to, the material scope and basic dates of the Contract);
- basic information on the Environmental Management Plan for Contract 1B.4/2;
- organizational system of supervision over the implementation of the Environmental Management Plan;
- the status of implementation of mitigation measures listed in Appendix 1 to the EMP;
- the status of implementation of monitoring measures listed in Appendix 2 to the EMP;
- description of other ESHS measures and events;
- summary.

## 1. BASIC INFORMATION ABOUT CONTRACT 1B.4/2

This Environmental Management Plan (EMP) applies to Task 1B.4/2 Dredging of the Klucz-Ustowo Ditch, which is part of Sub-Component 1B of the Odra-Vistula Flood Management Project (OVFMP) and is executed as a Contract for works: 1B.4/2.

The subject of the works was the execution of dredging and silting works on the Klucz-Ustowo Ditch waterway, including dredging sediments from the bottom of the Klucz-Ustowo Ditch (on the length of about 2.7 km) and deposition of the spoil in the spoil storage area "D". The dredging was intended to increase the depth of the existing waterway to ensure the ability to conduct effective icebreaking operations.

### List of key dates for the Contract:

Action	Date
Date of Contract signature	16/07/2020
Date of handing over the Construction Site	23/07/2020
Date of signing Annex 1 to the Contract Agreement	30/10/2020
Date of signing Annex 2 to the Contract Agreement	15/09/2021
Works commencement date:	03/08/2020
Dredging Works commencement date:	25/09/2021
Dredging Works completion date:	31/12/2021
Contract end date	28/02/2022

During the Contract period, two annexes to the concluded contract were signed. Annex No. 2 resulted in the need to update the provisions of the Environmental Management Plan with respect to the spoil storage area. The original version of EMP assumed that the spoil would be deposited in the Manków spoil storage area. As a result of the update, the Mańków spoil storage area was replaced with spoil storage area "D". Other provisions remained unchanged.

## 2. MITIGATION AND MONITORING MEASURES AS DEFINED IN THE EMP FOR CONTRACT 1B.4/2

The Environmental Management Plan for Contract 1B.4/2 was prepared in December 2019 (final version). Subsequently, the World Bank issued a "No objection" approval approving the Environmental Management Plan as one of the documents of the bidding procedure for the selection of the Works Contractor under the Contract. This is a document systematizing the measures undertaken under the Contract, obliging all entities participating in Contract implementation to comply with the provisions contained therein. A detailed description of the conditions for the implementation of the Contract with respect to environmental management was prepared in the form of appendices to the Environmental Management Plan – Appendix 1 containing the Mitigation Plan, and Appendix 2 containing the Monitoring Plan.

### 2.1. CONDITIONS SPECIFIED IN APPENDIX 1 TO THE EMP

In order to limit the negative impacts of the planned Task on the environment, Appendix 1 to the EMP provides a set of mitigation measures [1 to 80] to be applied by the Contractor. These measures were prepared on the basis of the conditions contained in the applicable administrative decisions on environmental protection issued for the Task (including the works notification) in addition to the additional conditions established at the stage of EMP preparation. Selected, characteristic mitigation measures are presented below, broken down into individual components of the environment. A complete list of mitigation measures is compiled in Appendix 1 to the EMP, and divided into the following categories:

Cat.	Category name	Item on the list
A	Requirements concerning realisation of the Task schedule	1 - 2
B	Communication requirements in the Task implementation Area	3-5
C	Procedures regarding location of the construction back-up facilities, roads, technological and storage sites, and parking areas	6
D	Procedures regarding management of dredged material	7 - 11
E	Procedures regarding securing protected natural environment resources	12 - 23
F	Procedures regarding prevention against environmental pollution, including restriction of emissions to the environment	24 - 32
G	Procedures regarding waste material and sewage	33 - 36
H	Procedures regarding human health and safety	37-44
I	Procedures regarding extraordinary hazards to the environment	45 - 53
J	Procedures regarding cultural monuments protection	54-55
F	Procedures regarding restoring of natural resources	56
L	Requirements regarding the Contractor's staff engaged in the execution of	57 - 61

Cat.	Category name	Item on the list
	EMP	
<i>M</i>	Reporting procedures on the EMP realisation	62 – 66
<i>N</i>	Dedicated measures to protect the water chestnut population in the Obnica Północna Canal	67 – 70
<i>O</i>	Management strategies, ESHS implementation plans and specific ESHS policy requirements	71 - 80

## 2.2. CONDITIONS SPECIFIED IN APPENDIX 2 TO THE EMP

Appendix 2 to the EMP sets out a series of monitoring measures the Task Contractor is obliged to implement. These measures were prepared on the basis of the conditions contained in the works notification and applicable administrative decisions issued for the Task, in addition to the additional conditions established at the stage of EMP preparation. Monitoring measures listed in Appendix 2 to the EMP, item 1-80, include monitoring the implementation of mitigation measures listed in Appendix 1 to the EMP. Monitoring measures listed in Appendix 2 to the EMP are assigned to individual groups of measures in the manner indicated above.

In addition, items 81 - 84 set out the requirements for conducting environmental monitoring during the Task implementation period. Item 85 defines obligations in the scope of ongoing control of compliance with the rules set out in the Contractor's documents, prepared for the purposes of Task implementation.

### **3. SYSTEM OF SUPERVISION OVER THE IMPLEMENTATION OF MEASURES SPECIFIED IN THE EMP FOR CONTRACT 1B.4/2**

Supervision over the implementation of mitigation and monitoring measures specified in the EMP for Contract 1B.4/2 was carried out at the level of all organizational units participating in the implementation of the Contract, i.e., the Contractor, Engineer, Project Implementation Unit (PIU), and Project Coordination Unit. Information on the scope of operation of individual units is presented below.

#### **3.1. CONTRACTOR**

The Construction Manager was the person directly responsible for the implementation of measures specified in the EMP on behalf of the Contractor. In order to provide support to the Construction Manager in the implementation of the EMP, an environmental supervision team was established within the Contractor's team, consisting of expert naturalists, including an EMP Implementation Coordinator and Environmental Supervision Coordinator. This person was to work on an ongoing basis with the Construction Manager, the rest of the Contractor's staff, and the environmental management expert on the Engineer's team to ensure that the conditions of the EMP were implemented, and to conduct ongoing reporting on the above. In addition, the Contractor ensured the participation of a team of archaeological surveillance experts [if necessary] and sapper experts [throughout the duration of the Contract], to the extent consistent with the requirements of the EMP. At the end of each month, the EMP Coordinator prepared the so-called Checklist, where the current status of implementation of individual EMP conditions in a given month was described. The Checklist was forwarded to the environmental management expert on the Engineer's team, along with relevant attachments (including but not limited to applications, environmental supervision opinions, etc.).

#### **3.2. ENGINEER**

Direct supervision over the implementation of the EMP conditions on behalf of the Engineer's team was carried out by the environmental management expert, who cooperated in this area with the Resident Engineer, supervision inspectors, and other members of the Engineer's team supervising the investment, including the Engineer's environmental supervision team. The Environmental management expert remained at all times in touch with the Construction Manager and the EMP Coordinator on the Contractor's team, establishing the scope of necessary conditions to be met at a given stage of the works, overseeing the status of implementation of individual EMP conditions, participating in the resolution of ongoing problems, and commissioning site inspections. At the end of each reporting period (month and quarter), the environmental management expert reviewed the Contractor's environmental documentation and prepared their own reports submitted to the Project Implementation Unit.

### **3.3. EMPLOYER/PROJECT IMPLEMENTATION UNIT [PIU]**

Direct supervision over the implementation of the EMP conditions on behalf of the Project Implementation Unit (PIU) was exercised by the Environmental Specialist, cooperating in this respect with the Head of the PIU, other members of the PIU team, as well as other organizational units of RZGW in Szczecin. The Environmental Specialist and the Head of the PIU remained at all times in touch with the environmental management expert on the Engineer's team, overseeing the status of the implementation of the various conditions of the EMP and engaging in the resolution of ongoing issues. After the end of each reporting period (month and quarter), the Environmental Specialist and the Head of the PIU verified the current environmental documentation of the Contract and then forwarded it to the Project Coordination Unit.

### **3.4. PROJECT COORDINATION UNIT [PCU]**

Direct supervision over the implementation of the EMP conditions on behalf of the Project Coordination Unit was exercised by the environmental management expert, who cooperated in this respect with other members of the PCU team. The expert was at all times in touch with the Head of the PIU and the Environmental Specialist on the PIU team. The expert also cooperated with the persons responsible for the implementation of the EMP on behalf of the other organizational units in the investment process, i.e. the environmental management expert on the Engineer's team, as well as the Construction Manager and the Contractor's Environmental Supervision Coordinator. The Environmental Management Expert oversaw the status of implementation of the various conditions of the EMP, engaging in ongoing problem solving and participating in site inspections. At the end of each reporting period (month and quarter), the expert verified the environmental documentation submitted by the PIU and prepared the contribution to the PCU reports subsequently submitted to the World Bank.

#### 4. STATUS OF IMPLEMENTATION OF MITIGATION MEASURES FROM APPENDIX 1 TO THE EMP

In accordance with the content of Appendix 1 to the EMP for Contract 1B.4/2, the Contractor is responsible for the implementation of mitigation measures specified in items 1 to 80 in Appendix 1 to the EMP.

In total, the EMP for Contract 1B.4/2 provides for the implementation of 80 mitigation measures<sup>1</sup>, of which 69 were implemented during the reporting period [July 2020 to February 2022] (there was no need to implement the remaining 9 measures – see below).

##### 4.1. MEASURES OF THE CONTRACTOR

According to the information submitted in each of the Contractor's monthly reports, the measures implemented by the Contractor included in Appendix 1, i.e., mitigation measures, were as shown in the following quantitative summary.

Reporting period	Measures implemented – I	Measures partially implemented – PI	Measures not implemented due to a lack of necessity – N/NN	Measures not implemented – N/N	Measure completed [N/C]
July 2020	30	7	42	1	-
August 2020	25	10	41	4	-
September 2020	28	7	41	4	-
October 2020	33	5	42	-	-
November 2020	37	1	42	-	-
December 2020	35	1	44	-	-
January 2021	35	1	44	-	-
February 2021	35	1	44	-	-
March 2021	35	1	44	-	-
April 2021	35	1	44	-	-
May 2021	36	1	43	-	-
June 2021	36	1	43	-	-
July 2021	36	1	43	-	-
August 2021	36	2	42	-	-
September 2021	69	-	11	-	-
October 2021	63	2	12	1	2
November 2021	67	-	11	-	2
December 2021	69	-	9	-	2
January 2022	24	-	9	1	46
February 2022	-	-	9	-	71

The above list clearly shows that the implementation of individual measures was related to the period when dredging works were actually carried out in accordance with the adopted schedule, i.e., from September 2021 to December 2021. During this period, the greatest number of mitigation measures was implemented [ $I_{\max}$  - 69], accounting for approximately 86% of all measures, and there was the lowest number of measures not implemented due to a lack of necessity [ $N/NN_{\min}$  - 9], accounting for 11% of all measures.

Mitigation measures were implemented by the Contractor with the participation of specialists from the Contractor's environmental team. During the reporting period, this team consisted of the following persons: the environmental supervision coordinator (who simultaneously served as the coordinator of the environmental supervision team and the social affairs specialist), as well as with the support of an expert botanist, expert zoologist and ichthyologist, zoologist – mammal expert, herpetologist, zoologist – ornithologist. The Contractor's resources also included sapper and archaeological supervision. Archaeological and sapper supervision was provided throughout the duration of the Contract; however, there were no situations/events that required their involvement.

Mitigation measures were agreed (if required by the terms of the Contract and/or EMP) and supervised by the Engineer, with the participation of the following members of the Engineer's team: environmental management expert, Contract Engineer environmental supervision expert, and Resident Engineer.

#### **4.2. MEASURES OF THE ENGINEER**

According to the information presented in the monthly and quarterly reports on the implementation of measures specified in the EMP, during the reporting period, the Engineer implemented 1 (1%) mitigation measure [in cooperation with the Contractor and the Employer – item 63 regarding monthly EMP meetings].

During the reporting period, one deficiency was identified in this regard [January 2022] - the measure was not implemented during this reporting period, despite the fact that such an obligation is indicated in the EMP. The lack of an EMP meeting conducted during this period was due to the fact that construction work was completed in December 2021. Due to the lack of work and operations by the Contractor with respect to mitigation measures, it was decided that the meeting related to determining the implementation of these measures would not be held.

#### **4.3. MEASURES OF THE EMPLOYER**

According to the information presented in the monthly and quarterly reports on the implementation of measures specified in the EMP, during the reporting period, the Employer implemented 1 (1%) mitigation measure [in cooperation with the Contractor and the Engineer – item 63 regarding monthly EMP meetings].

During the reporting period, one deficiency was identified in this regard [January 2022] - the measure was not implemented during this reporting period, despite the fact that such an obligation is indicated in the EMP. The lack of an EMP meeting conducted during this period

was due to the fact that construction work was completed in December 2021. Due to the lack of work and operations by the Contractor with respect to mitigation measures, it was decided that the meeting related to determining the implementation of these measures would not be held.

#### 4.4. ISSUES RELATED TO THE IMPLEMENTATION OF MITIGATION MEASURES FROM APPENDIX 1 TO THE EMP

According to the information presented in the monthly and quarterly reports on the implementation of measures specified in the EMP, the following problems and/or irregularities related to the implementation of the 19 mitigation measures from Appendix 1 to the EMP for Contract 1B.4/2 were identified during the reporting period (in order according to the item numbers in Appendix 1 to the EMP).

Measures defined as not implemented [N/N] for the period July-September 2020 and October 2021 and January 2022 [measures not implemented are presented in the order assigned to EMP items]:

- item 57 [July 2020, October 2021] - *training the Contractor's staff in EMP implementation*

*The Contractor shall be responsible for conducting training (to be concluded with a test checking the participants' knowledge) in the rules and conditions of the EMP and protection indications for the time of construction, dedicated to Contractor's executives and engineers supervising the construction, which training should be prepared by Contractor's team of naturalists. The Contractor's employees who handle fuels, other oil derivatives or any other substance harmful to health or environment should be trained in the rules of preserving groundwater environment and using measures for its preservation, including the use of sorbents and spillage barriers on water. In the monthly reports submitted to the Engineer, the Contractor shall provide information on the status of training of the Contractor's personnel in the conditions of the EMP in the current reporting period - during the indicated reporting periods [i.e. July 2020 and October 2021], the Contractor did not provide training on the above-mentioned issues; therefore, the measure was considered not implemented due to a failure to take action. In October 2021 the EMP Coordinator did not conduct training for employees on their responsibilities under the EMP, despite the increase in the number of personnel involved in Contract implementation. Accordingly, the measure was considered not implemented. As part of corrective actions, the Contractor conducted training at later dates, providing training for the entire staff as a result. ;*

- item 62 [August 2020, September 2020] - *reporting the status of EMP implementation in monthly reports. During the execution of the Task, the Contractor shall submit monthly reports on the implementation of the conditions specified in the EMP to the Engineer (in the form of a checklist with necessary appendices, including reports on environmental supervision). The Engineer shall provide the Contractor with a template*

*of the above-mentioned report (checklist). Depending on the circumstances, the Engineer may require the Contractor to submit additional reports, regarding, among others, the occurrence of crisis situations, the implementation of selected items of the EMP, etc.* - The Contractor failed to submit reports for August and September 2020 by the due date - as a result, the measure was considered not implemented - the overdue reports were not submitted until October 2020;

- item 63 [January 2022] - *Discussing the implementation of the EMP at working meetings and Construction Council Meetings. In the period of Task execution, monthly meetings of the representatives of the PIU, the Engineer, and the Contractor shall be held to discuss and check the implementation of the mitigation and monitoring measures set out in the EMP. Notwithstanding the above, any current requirements and issues related to the implementation of the EMP shall be discussed at all Construction Council Meetings* - no meeting was held during this reporting period to discuss and review the implementation of mitigation and monitoring measures identified in the EMP. The dredging works ended on 31 December 2021, so there was no need to hold a meeting in this regard;
- item 64 [August 2020, September 2020] - *preparing periodic reports (monthly and quarterly reports and the final report) on the implementation of the conditions specified in the EMP (in the form of a checklist with necessary appendices, including reports on environmental supervision) submitted to the Engineer and requiring their approval* - the Contractor did not submit reports for August and September 2020 on time - as a result, the measure was considered not implemented - the overdue reports were not submitted until October 2020;
- item 71 [August 2020 - September 2020] - *within 30 days from the date of commencement of the Contract, the Contractor shall prepare and submit to the Engineer for approval a document entitled: Implementation plan and strategy for managing environmental, social, health and safety risks: which includes, among others, elements such as: description of measures taken to manage risks, description of materials and equipment used, description of management processes, etc., which will be carried out by the Contractor and their Subcontractors to minimise risks. At the request of the Engineer, the Contractor shall update the Implementation plan and the strategy for managing environmental, social, health and safety risks.* - during the period in question - i.e., within 30 days of the Contract commencement date, the Contractor failed to submit the Implementation plan and strategies for managing environmental, social, health and safety risks - due to the missed deadline, the measure was considered not implemented. As a corrective action, the Contractor submitted documentation later, in October 2020;
- item 72 [August 2021 - September 2020] - *contractor's Responsibility for ESHS Compliance The Contractor shall ensure the implementation of all requirements and conditions of the ESHS and the plan referred to in item 71. This applies to the Contractor and their personnel regardless of the legal basis of cooperation, and*

*accordingly to Subcontractors and their personnel* - during the period in question, i.e., within 30 days of the Contract commencement date, the Contractor failed to submit the Implementation plan and strategies for managing environmental, social, health and safety risks; therefore, in the CE's judgement, there was no basis for the Contractor's implementation of all requirements and conditions of ESHS and the plan referred to in item 71. - the measure was considered not implemented. As a corrective action, the Contractor submitted documentation later, in October 2020.

Partially implemented measures [PI]:

- item 1, 2 - *EMP conditions regarding the deadlines for carrying out the works* - partial implementation due to issues related to the necessity of adjusting the dates of water chestnut metaplanting to the conditions indicated in the EMP, which should be compatible with the date indicated for dredging works. In response to the above, the Contractor submitted another version of the material and financial schedule, which was finally accepted by the CE, leading to full compliance with the provisions of the EMP;
- item 37 - *preparation of documents related to safety in the area of Task implementation* - partial implementation was due to the fact that in the quarterly reporting period indicated in the list of mitigation measures attached as Appendix 1 to this report, the Contractor did not obtain the CE's approval for the submitted documentation. The fact that the documentation submitted by the Contractor contained provisions that were inconsistent with the provisions of the Environmental Management Plan [e.g. with respect to deadlines for the execution of works, technology of execution, and the scope of training] was the argument behind deeming this as partially implemented. After the Contract Engineer's comments and a request to correct the documentation, the Contractor brought the document into compliance with the EMP;
- item 38 - *preparation of documents related to safety in the area of Task implementation* - partial implementation was due to the fact that in the quarterly reporting period indicated in the list of mitigation measures attached as Appendix 1 to this report, the Contractor did not obtain CE's approval for the submitted documentation. The fact that the documentation submitted by the Contractor contained provisions that were inconsistent with the provisions of the Environmental Management Plan [e.g. with respect to deadlines for the execution of works, technology of execution, and the scope of training] was the argument behind deeming this as partially implemented. After the Contract Engineer's comments and a request to correct the documentation, the Contractor brought the document into compliance with the EMP;
- item 42 - *ensuring conditions of hygiene* - staff were trained on how to maintain appropriate hygienic conditions during a training in September 2021. During the subsequent reporting period [October 2021], the Contractor did not formally repeat

the training despite the increase in the number of personnel for the Contract work and did not inform the CE of this fact. Despite this, the inspection carried out by the CE at the work site did not reveal any irregularities in this respect - appropriate hygienic conditions were ensured at the work site, despite the lack of appropriate training in this regard. Therefore, the measure was considered partially implemented;

- item 44 - *prevention of HIV-AIDS* - partial implementation in some reporting periods was due to the fact that the Contractor was looking for a service provider suitable for this purpose for a longer period of time. Upon completion of these measures, personnel were properly trained as evidenced by the training certificates submitted by the Contractor;
- item 58 - *designating Contractor's EMP Coordinator* - partial implementation was due to the informal appointment of the coordinator for the EMP - after the formal notification and the CE's approval, the measure was implemented correctly;
- item 59 - *providing an environmental supervision team* - partial implementation was due to the informal establishment of the environmental supervision team - after formal notification and the CE's approval the measure was implemented correctly;
- item 61 - *providing a sapper's supervision team* - partial implementation was due to the informal establishment of the sapper's supervision team - after a formal notification and the CE's approval, the measure was implemented correctly;
- item 70 - *protection of water chestnut specimens* By letter dated 15.09.2020, the Contractor submitted a water chestnut inventory report to the Contract Engineer, at the same time applying for the possibility of metaplanting in the 39th week, in September. The necessity of metaplanting the water chestnut in September 2020 was preceded by discussions conducted by the Contractor regarding a potential possibility to change the location of the place of spoil storage - searching for a new place of storage would allow to shorten the duration of the Contract and would also make the Contractor independent from the Manków storage area, which had a limited availability due to an agreement with the Maritime Office in Szczecin. In turn, the availability of the Mańków area translated, among other things, into the deadlines indicated in the Environmental Management Plan. Bearing in mind the above, as well as the results of the Contractor's Environmental Supervision Team's Report on the estimated number of water chestnuts in the Obnica canal [northern branch] made on the basis of the natural inventory, which was submitted on 15 September 2020, and the Contractor's argumentation confirmed by the opinion of the Engineer's Environmental Supervision, indicating that in September this year the condition of plants and their stage of development [still ripening, green nuts] enable metaplanting, the Contract Engineer gave their consent to metaplanting. Despite the fact that in accordance with the adopted reporting methodology it was necessary to consider the measure partially implemented [due to applicable deadlines], the Contract Engineer emphasized that the measures were implemented correctly. In spite of this, because of conducting works in accordance with the accepted schedule [metaplanting performed in the previous year was a conditional measure connected with

Contractor's actions aiming at earlier Contract completion] in September 2021 it was necessary to again metaplant the water chestnut, which was preceded by inventory of this species and determination of its estimated abundance. The metaplanting was carried out correctly - also in terms of timing, which was confirmed by the Contractor's Environmental Supervision and the Contract Engineer.

- item 74 - *raising awareness about the prevention of sexual harassment and mobbing* – partial implementation in some reporting periods due to the fact that the Contractor had been searching for a service provider suitable for this purpose for an extended period of time. Upon completion of these measures, personnel were properly trained as evidenced by the training certificates submitted by the Contractor;
- item 76 - *allowing the submission of complaints and requests by personnel involved in the Task* - partial implementation was due to the fact that the Contractor did not submit the content of leaflet and the format of register for filing complaints about working conditions and salaries to the CE to be agreed with the CE, and did not inform the CE about actions taken in this respect - after submitting to the CE for acceptance, the measure in the further part of the Contract was implemented correctly;
- item 79 – *Contractor's OHS supervision* – work was conducted as indicated in this item – Contractor indicated the person responsible for health and safety among their staff. Partial implementation was due to the need to conduct training, which took place before the works commenced. Later in the implementation of the measure, it had the status of being implemented – with the exception of October 2021 – because in the indicated reporting period the Contractor did not repeat the training, despite the increase in the number of personnel for the Contract work. Therefore, the measure was considered partially implemented.

Other measures were implemented correctly or there was no need for them.

## 5. STATUS OF IMPLEMENTATION OF MONITORING MEASURES FROM APPENDIX 2 TO THE EMP

As stated in Appendix 2 to the EMP for Contract 1B.4/2, the entities responsible for implementing monitoring measures listed in Appendix 2 to the EMP are: **The Contractor (84 measures:** items 1-57, 59-85 in Appendix 2 to the EMP), **Engineer (85 measures:** item 1-85 in Appendix 2 to the EMP). In total, the EMP for Contract 1B.4/2 provides for the implementation of 85 monitoring measures, all of which should be implemented during the reporting period.

### 5.1. MEASURES OF THE CONTRACTOR

During the reporting period, the Contractor monitored the mitigation measure implementation as described in Appendix 2 to the EMP. Monitoring was conducted through:

- verification of the requirements specified in the EMP for the current stage of works;
- verification of the Contractor's documents regarding the fulfilment of the conditions of the EMP;

- ongoing inspections in the work area;
- measures indicated in Appendix 2 to the EMP.
- ongoing arrangements with representatives of the Engineer and the Investor.

During the reporting period, the Contractor generally completed 84 (100%) monitoring measures:

- a) 84 (100%) measures were completed to the extent required during the reporting period (Items 1-57, 59-85 in Appendix 2 to the EMP),
- b) in the case of two measures, in one of the reporting periods [October 2021] two items from monitoring measures were not implemented in accordance with the EMP - item 57 and 79 of Appendix 2 monitoring measures. During this reporting period, the number of the Contractor's personnel increased - to 16 people - and the CE recommended that another training on EMP be conducted and documented for the new employees involved in the Task. The Contractor did not repeat the training, despite the increase in the number of personnel for the Contract work – hence the not implemented status in item 57 and partially implemented in item 79 [despite ensuring constant OHS supervision, the training was not repeated for new personnel]. The CE did not react properly to the deficiencies related to the issue of conducting additional training. As a corrective recommendation, CE conducted a spot check on the Contractor's personnel's knowledge of the provisions of the EMP and recommended additional training in this area.

Monitoring measures were conducted by the Contractor with input from specialists on the Contractor's environmental team, including the EMP coordinator, the EHS coordinator, and the sapper surveillance team.

## 5.2. MEASURES OF THE ENGINEER

During the reporting period, the Engineer conducted mitigation implementation monitoring measures as described in Appendix 2 to the EMP. Monitoring was conducted through:

- verification of the requirements specified in the EMP for the current stage of works;
- verification of the Contractor's and Investor's documents regarding the fulfilment of the conditions of the EMP;
- ongoing inspections in the work area;
- measures indicated in Appendix 2 to the EMP;
- ongoing arrangements with representatives of the Contractor and the Investor.

During the reporting period, the Engineer generally completed 85 (100%) monitoring measures:

- a) 85 (100%) measures were completed to the extent required during the reporting period (items 1-85 in Appendix 2 to the EMP),
- b) in the case of two measures, in one of the reporting periods [October 2021] two items from monitoring measures were not implemented in accordance with the EMP - item

57 and 79 of Appendix 2 monitoring measures. During this reporting period, the number of the Contractor's personnel increased - to 16 people - and the CE recommended that further training on EMP be conducted and documented for the new staff involved in the Task. The Contractor did not repeat the training, despite the increase of the number of personnel for the Contract work – hence the not implemented status in item 57 and partially implemented in item 79 [despite ensuring constant OHS supervision, the training was not repeated for new personnel]. The CE did not react properly to the deficiencies related to the issue of conducting additional training. As a corrective recommendation, CE conducted a spot check on the Contractor's personnel's knowledge of the provisions of the EMP and recommended additional training in this area.

The monitoring measures were implemented by the Engineer with the assistance of specialists from the environmental team, including environmental management experts, the Engineer's environmental supervision team, and the Resident Engineer.

#### **5.4. ISSUES RELATED TO IMPLEMENTATION OF MONITORING MEASURES FROM APPENDIX 2 TO THE EMP**

According to the information presented in monthly reports on the implementation of measures specified in the EMP, in the reporting period no problems were found with the implementation of monitoring measures described in Appendix 2 to the EMP for Contract 1B.4 / 2 - except for a single situation described in items 5.2 and 5.3. This was also confirmed by the CE's monitoring measures.

#### **6. OTHER MEASURES AND EVENTS RELATED TO THE ENVIRONMENT, LOCAL COMMUNITY, HEALTH AND SAFETY**

During the reporting period, the Contractor conducted preparatory and dredging work under Contract 1B.4/2, including, but not limited to, the implementation of various measures specified in the Environmental Management Plan to the extent assigned to the Contractor.

In addition, during the reporting period, the Contractor implemented, among others, the following other environmental, community, health, and safety measures related to Contract 1B.4/2:

- due to the risk of spreading coronavirus infections causing the COVID-19 disease, during the period from the first quarter to the fourth quarter of 2020, the Contractor provided the Engineer with weekly reports on Contract 1B.4/2 in the context of this risk.

Measures to prevent coronavirus infection, including the need to monitor the disease and in case of its occurrence – to take appropriate steps, were also implemented by the Contract Engineer and the Employer.

## 6.1. EXCEPTIONAL EVENTS, RISKS, AND DISASTERS

During the performance of the Contract, there were no exceptional events, risks, or disasters. In October 2021, the Contractor reported that the dredger had failed, which caused downtime. The Contractor reported that the engine was removed from the dredger, transported to the shop where it was repaired, and subsequently mounted back onto the dredger. The repair did not take place on water and therefore did not pose a risk, including a risk to the environment. The Contract Engineer carried out appropriate checks in this regard – both during the failure and after the engine replacement.

## 6.2. ACCIDENTS

During the performance of the Contract, there were no incidents related to accidents, including accidents involving the Contractor's staff, the Engineer, or the Employer.

## 6.3. PROVIDING PAY AND WORKING CONDITIONS FOR PERSONNEL

During the reporting period, the Contractor ensured appropriate pay and working conditions for personnel, in accordance with applicable Polish labour laws.

No reports or irregularities were noted by the Engineer as part of monitoring measures.

## 6.4. PREVENTING CASES OF SEXUAL HARASSMENT AND MOBBING

In the reporting period, there were no events related to cases of sexual harassment and mobbing. The Engineer did not record any reports or irregularities in this regard.

## 7. SUMMARY

This document provides a report on the implementation of measures identified in the Environmental Management Plan (EMP) for the project: Contract for works 1B.4/2 *Dredging of the Klucz - Ustowo Ditch* as part of the *Odra-Vistula Flood Management Project (OVFMP)*.

The report covers measures implemented during the period:

- from the date of commencement of works under Contract 1B.4/2 (i.e., **July 16, 2020**);
- to the date of completion of works considered essential, resulting from the Time for Completion for the above-mentioned Contract (i.e., **until February 28, 2022**).

During the reporting period, the Contractor carried out dredging works within the scope of the Contract (see description in Chapter 1), including the implementation of 80 mitigation measures specified in Appendix 1 to the EMP, monitored 84 items specified in Appendix 2 to the EMP, and attended other environmental, community, health and safety events.

In the reporting period, the Engineer supervised the dredging works carried out under Contract 1B.4 / 2, including the implementation of individual measures specified in the Environmental Management Plan within the scope assigned to the Engineer, monitored the

implementation status of 85 mitigating measures specified in the EMP and participated in other events related to the environment, local community, health and safety.

In the reporting period, the Employer implemented measures assigned to it related to the implementation of Contract 1B.4 / 2, including individual measures specified in the Environmental Management Plan in the scope assigned to the Investor, monitored the implementation of mitigating measures specified in the EMP, and participated in other events related to the environment, local community, health and safety.

As a result of monitoring measures implemented by the Contractor, the Engineer, and the Employer, it was determined that during the reporting period:

- a) 69 out of 80 mitigation measures specified in Appendix 1 to the EMP were implemented;
- b) 11 of the 80 mitigation measures identified in Appendix 1 to the EMP were not implemented [there was no need to implement them during the reporting period];
- c) 85 out of 85 monitoring measures from Appendix 2 to the Environmental Management Plan were implemented, irregularities were found in the case of 2 of them.

## 8. LIST OF APPENDICES

Appendix 1 – Checklist for the implementation of measures listed in Appendices 1 and 2 to the EMP  
for Contract 1B.4/2

Appendix 2 – Photographic documentation