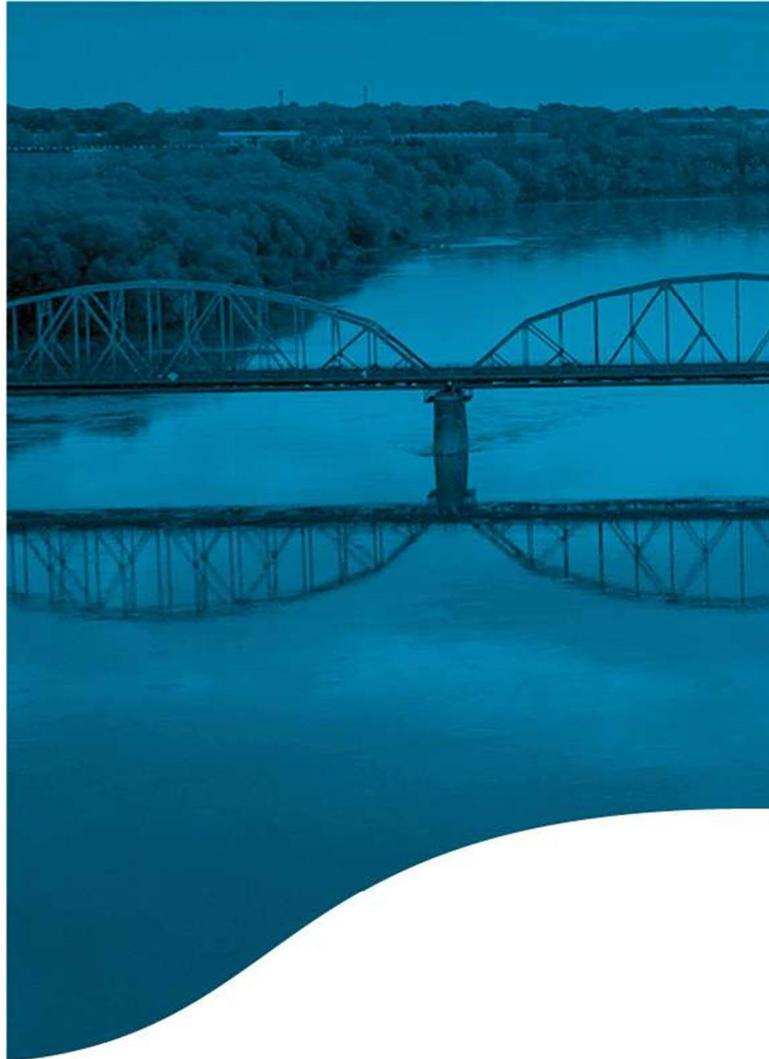




Final Report

Environmental Management Plan



ODRA - VISTULA FLOOD MANAGEMENT PROJECT

CO-FINANCED BY:

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ODRA – VISTULA
FLOOD MANAGEMENT PROJECT



Państwowe
Gospodarstwo Wodne
Wody Polskie

December 2023

FINAL REPORT
ON IMPLEMENTATION OF THE MEASURES SPECIFIED IN ENVIRONMENTAL MANAGEMENT PLAN
OF CONTRACT 1A.2

Odra – Vistula Flood Management Project

Sub-Component	1.A: Flood protection of areas in Zachodniopomorskie Voivodeship
Contract (Task)	Flood protection of Gryfino, Ognica, and Piasek village on Odra River. Modernization of Marwicki Polder Stage III - pump station Krajnik
Investor / Project Implementation Unit	State Water Holding Polish Water, represented by Director of Regional Water Management Board in Szczecin,
Contractor	Keller Polska Sp. z o.o.
Engineer	SWECO Polska Sp. z o.o., ul. Franklina Roosevelta 22, 60-829 Poznań <u>Mailing address:</u> SWECO Polska Sp. z o.o. ul. Łyskowskiego 16 71-641 Szczecin

Final Report on implementation of the measures specified in Environmental Management Plan
for Contract 1A.2

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INTRODUCTION

The Final Report on the implementation of the measures specified in the Environmental Management Plan describes adoption of the mitigating and monitoring measures for Contract 1A.2: "Flood protection of Gryfino, Ognica, and Piasek village on Odra River. Modernization of Marwicki Polder Stage III - pump station Krajnik" throughout the term of the Contract.

The following are presented for the Contract:

- General information on Contract 1A.2 (such as material scope and key deadlines of the Contract);
- General information on the Environmental Management Plan for Contract 1A.2;
- Organizational structure of supervision over the implementation of the Environmental Management Plan;
- Progress in implementation of mitigation measures specified in Annex 1 to EMP;
- Progress in implementation of monitoring measures specified in Annex 2 to EMP;
- Description of other measures and events related to ESHS;
- Summary.

1. GENERAL INFORMATION ON CONTRACT 1A.2

This Report on implementation of the measures stipulated in Environmental Management Plan (EMP) applies to Contract 1A.2 "Flood protection of Gryfino, Ognica, and Piasek village on Odra River. Modernization of Marwicki Polder Stage III - pump station Krajnik" being Sub-Component 1A of Odra - Vistula Flood Management Project (OVFMP).

Originally the Contract's scope covered works grouped into four Sub-Tasks. The structure of the Contract required setting up four separate sites along the Odra River, 7 - 13 km from each other. The planned scope was diversified and adjusted to flood protection needs of specific Sub-Tasks, including:

- Sub-Task I: improvement of the wharf of RWMA icebreaker base in Gryfino – elevating part of the lot of land up to ordinate 2.00 mamsl, to protect the existing icebreaker base in Gryfino against flood.
- Sub -Task II: flood protection of Ognica - reconstruction of the existing culvert made of concrete pipe located in the bed of the Kanał Rynica – Ognica at the point of collision with the municipal public road No. 415003Z, into an arched and circular culvert made of steel sheet with vertical clearance. As part of the works, it was assumed that regulatory works would be carried out on the estuary section of the Kanał Rynica – Ognica, ensuring the achievement of appropriate hydraulic conditions for the flow of large waters through the Kanał Rynica – Ognica. It was assumed that the works would be carried out on a section of up to 342 m in length from the mouth of the Odra River upstream of the canal.
- Sub-Task III: flood protection of Piasek – construction of a flood protection structure protecting the village of Piasek against water overflow from Kanał Piasek dependent on the level of water in the Odra River. The scope of works covered construction of two sections of an earth flood embankment with a flood protection wall made of steel sheet piles, 2100 m long in total.
- Sub-Task IV: modernization of Krajnik pump station – the works involved renovation of the pump station building and replacement of technical infrastructure, including a power line supplying the facility.

Sub-Task II (flood protection of Ognica) was given up due to inability to acquire the land required for the undertaking. The compensation rates for land acquisition requested by the owners did not meet the rationality criteria for spending public funds. After giving up the material scope of the Sub-Task, the scope of works required to complete Contract 1A.2, as regards their type, location, and impact, did not extend beyond the ones anticipated and analyzed in EMP and the obtained administrative decisions. Therefore, the above circumstance did not impact the Contract in environmental terms. The scope was excluded from the Contract with Annex 4 dated 13 Feb 2023.

Table 1 Breakdown of key deadlines of the Contract

Activity	Date
Agreement conclusion date	07 Sep 2021
Construction Site handover date	14 Sep 2021
Date of commencement of the construction works	14 Sep 2021
Date of approving the Schedule of Works	30 Dec 2021
Date of signing Amendment 1	15 Oct 2021
Date of signing Amendment 2	26 Jun 2022
Date of signing Amendment 3	26 Sep 2022
Date of signing Amendment 4	13 Feb 2023
Date of signing Amendment 5	28 Apr 2023
Date of signing Amendment 6	14 Jul 2023

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for Contract 1A.2

Activity	Date
Date of signing Amendment 7	11 Sep 2023
Date of approving the updated Schedule of Works	25 May 2023
Notification of readiness for final acceptance	05 Sep 2023
Final acceptance	6 Sep 2023

2. MITIGATING AND MONITORING MEASURES SPECIFIED IN EMP FOR CONTRACT 1A.2

The Environmental Management Plan for Contract 1A.2 was developed in November 2020. Subsequently, in March 2021, 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 Construction Contractor under the Contract. It is a document systematizing the activities undertaken under the Contract, obliging all entities participating in the performance of the Contract to comply with the provisions contained therein. Detailed description of the Contract delivery terms related to Environmental management was developed as Annexes to EMP: Annex 1 is the Plan of Mitigating measures and Annex 2 is the Plan of Monitoring Measures.

2.1. CONDITIONS SPECIFIED IN ANNEX 1 TO EMP

To limit the adverse impact of the planned Task on the environment, Annex 1 to EMP provided a list of 149 mitigating measures. The measures were developed on the basis of the conditions contained in the binding administrative decisions regarding environmental protection issued for specific elements of the Task and Sub-Tasks (including notification of works documentation), supplemented with additional terms determined at the stage of preparing EMP. The complete list of mitigating measures is contained in Annex 1 to EMP. They are grouped into the following categories:

Table 2 Categories of grouped measures specified in Annex 1 to EMP

Designation	Category	Item in table
A	Land acquisition rules	1 - 7
B	Requirements related to acquisition and compensation	8 - 9
C	Requirements related to protection of natural resources	10 - 32
D	Requirements related to the handling of earth obtained in the course of works	33 - 39
E	Requirements related to communication in the Implementation area	40 - 50
F	Management of the Implementation area (construction site, temporary acquisition areas)	51 - 59
G	Requirements related to waste handling	60 - 68
H	Requirements related to tree clearance, clearing shrubs and protection of plants not designated for removal	69 - 75
I	Requirements related to prevention of environment pollution	76 - 98
J	Requirements after completion of basic works	99 - 100
K	Requirements related to protection of cultural heritage and tangible property	101 - 110
L	Requirements related to ensuring health and safety of people	111 - 131
M	Obligations on Contractor's personnel involved in the implementation of EMP	132 - 138

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Designation	Category	Item in table
N	Specific requirements defined in the World Bank's ES policies	139 - 148
O	Guidelines related to the performance of works in the case of a state of epidemic or state of epidemic threat	149

2.2. CONDITIONS SPECIFIED IN ANNEX 2 TO EMP

Annex 2 to EMP specifies a set of monitoring measures that are obligatory to the Contractor of the Task. The measures were based on the terms included in the notification of works and valid administrative decisions issued for the Task, supplemented with additional terms determined at the stage of EMP preparation. The monitoring measures specified in Annex 2 to EMP are assigned to specific groups of measures in the manner described above.

The table of monitoring measures specifies, i.e., the location, manner, period, and frequency of the monitoring, as well as the entity in charge of the implementation.

3. SYSTEM OF SUPERVISION OVER IMPLEMENTATION OF THE MEASURES SPECIFIED IN EMP FOR CONTRACT 1A.2

Implementation of the mitigating and monitoring measures specified in EMP for Contract 1A.2 was supervised at the level of all the organization units taking part in delivery of the Contract, i.e. the Contractor, Engineer, Project Implementation Unit (PIU), and Project Coordination Unit (PCU).

Furthermore, throughout the delivery of the Contract monthly meetings were held for review and control of the mitigating and monitoring measures resultant from EMP. Current requirements and issues related to implementation of the measures specified in EMP were also discussed at monthly Site Meetings. All the meetings were attended by representatives of the Contract Engineer, Employer (Project Implementation Unit), Contractor, and Project Coordination Unit. At the same time, during the execution of the Contract, implementation of specific measures was monitored for correctness through regular construction site inspections by the Engineer, both in environmental, and OHS terms. Specific inspections were documented with minutes, reports, and photo documentation of the site, examples of which are included in Appendix 2 hereto. The site inspections and meetings with the Contractor covered current works, identification necessary measures, and issuing current recommendations and guidelines. The Contractor was also provided guidance through regular correspondence and review of the documentation submitted by the Contractor. Correctness of the Contractor's delivery was reviewed for compliance with the Contractor's terms and conditions and applicable laws, such as the Construction Law and the Environmental Law as well as administrative decisions obtained for delivery of the Contract.

Supervision over implementation of the measures resultant from EMP included preparing monthly reports by the Contractor, reviewing them by the Engineer, and monthly reports by the Engineer. On the basis of the monthly reports, aggregate quarterly reports were prepared and submitted to the Project Implementation Unit which forwarded them later to the Project Coordination Unit. The quarterly reports were incorporated into PCU's reports submitted to the World Bank.

Scopes of duty of specific entities are provided below.

3.1. THE CONTRACTOR

The person directly in charge of implementing the measures specified in EMP on behalf of the Contractor was the Site Manager. To support the Site Manager in implementing EMP, an EMP Coordinator and environmental supervision team were appointed in the Contractor's team. The members included expert(s)

with the knowledge of plants, reptiles, amphibians, mammals, and bats. The EMP Coordinator's duties included on-going cooperation with the Site Manager, other personnel of the Contractor, and expert for environment management in the Engineer's team related to implementation of EMP requirements and current reporting in the respect. Furthermore, the Contractor ensured support of an archaeological supervision and ordnance disposal teams in the scope compliant with EMP, throughout execution of the Contract. After the end of each month the EMP Coordinator submitted so-called checklist on the current progress of EMP implementation for the month. The checklist was sent to the environment management expert in the Engineer's team, including relevant Annexes (such as requests, environmental supervision reviews, etc.).

3.2. THE ENGINEER

Direct supervision over the implementation of the conditions of the EMP on behalf of the Engineer's team was exercised by an environmental management expert, cooperating in this respect with the Resident Engineer, supervision inspectors and other members of the Engineer's team performing investor's supervision over the implementation of the investment. The environmental management expert was in constant contact with the Site Manager and the EMP Coordinator in the Contractor's team, determining the scope of conditions necessary to be met at a given stage of works, supervising the implementation of individual conditions of the EMP, participating in solving current problems and conducting inspections on the site of the works being carried out. At the end of each reporting period, the Environmental Management Expert verified the Contractor's environmental documentation and prepared their own reports (monthly and quarterly) submitted to the Project Implementation Unit.

3.3. THE EMPLOYER / PROJECT IMPLEMENTATION UNIT (PIU)

Direct supervision over implementation of EMP requirements on behalf of the Project Implementation Unit (PIU) was exercised by the Environmental Expert, working in the respect with PIU Manager, other PIU team members, and other organizational units of SWH PW Regional Water Management Authority in Szczecin. The Environmental Expert and PIU Manager maintained regular contacts with the environment management expert in the Engineer's team, supervising the implementation process of specific EMP requirements, and getting involved in settling current issues. After each reporting period (month and quarter) the Environmental Expert and PIU Manager verified the current environmental documentation of the contract and submitted it to the Project Coordination Unit.

3.4. THE PROJECT COORDINATION UNIT (PCU)

Direct supervision over implementation of EMP requirements on behalf of the Project Coordination Unit was exercised by the Environment Management Expert, working in the respect with other PCU team members. The Expert maintained regular contacts with PIU Manager and Environmental Expert in PIU team. After each reporting period (quarter), the Expert verified the environmental documentation submitted by PIU and prepared own contribution to PCU reports submitted subsequently to the World Bank. The expert took part in regular meetings of the EMP and Construction Councils. On an ongoing basis, he participated in solving problems with the implementation of mitigation and monitoring measures during the entire period of the Contract.

4. PROGRESS OF MITIGATING MEASURES FROM ANNEX 1 TO EMP

In accordance with Annex 1 to EMP for Contract 1A.2, the party responsible for implementation of the mitigating measures specified as items 1-149 is the Contractor.

EMP for Contract 1A.2 stipulated 149 mitigating measures in total, out of which 129 were implemented in the reporting period (September 2021 to August 2023). The remaining 20 measures were found not necessary to implement.

4.1. THE CONTRACTOR'S MEASURES

As reported monthly by the Contractor, the Contractor's mitigating measures specified in Annex 1 to EMP were as listed below.

Table 3 Breakdown of mitigating measures implemented monthly by the Contractor through the Contract.

Reporting period	Measures being implemented I	Measures being partially implemented PI	Measures not being implemented due to no need N/NN	Measures not being implemented N/N	Measures completed N/C	Measures not applicable N/A
September 2021	26	9	113	0	0	1
October 2021	26	9	113	0	0	1
November 2021	52	13	83	0	0	1
December 2021	78	8	60	0	2	1
January 2022	100	5	40	0	3	1
February 2022	99	5	39	0	5	1
March 2022	99	6	38	0	5	1
April 2022	101	5	37	0	5	1
May 2022	103	3	36	0	6	1
June 2022	104	4	33	1	6	1
July 2022	105	3	33	0	7	1
August 2022	97	6	35	3	7	1
September 2022	99	4	38	0	7	1
October 2022	101	2	38	0	7	1
November 2022	97	5	39	0	7	1
December 2022	93	7	41	0	7	1
January 2023	101	2	38	0	7	1
February 2023	101	1	37	0	7	3
March 2023	101	1	37	0	7	3
April 2023	101	2	36	0	7	3
May 2023	100	2	34	0	10	3
June 2023	101	2	34	0	9	3
July 2023	95	1	38	0	12	3
August 2023	22	1	17	0	123	3

The above breakdown clearly shows that implementation of specific measures reflected actual progress of works, i.e. from September 2021 to August 2023. Majority of the mitigating measures was implemented in July 2022 [$I_{max} = 105$], which made up about 70.5% of all the measures.

The mitigating measures were implemented by the Contractor with EMP Coordinator and experts from the Contractor's natural environment team.

The Contractor's resources included also ordnance disposal supervision and archaeological supervision ensured for the term of the Contract. The Contractor had an Ordnance Disposal Plan and the ordnance disposal supervision team surveyed the ground for unexploded bombs or munitions etc. at the construction site. The archaeological supervision team successively surveyed the construction site for archaeological artifacts and objects that could have historical meaning, each time from which they prepared a Report on archaeological research

If required by provisions of the Contract and / or EMP, the mitigating measures were consulted with and supervised by the Engineer with the involvement of the Engineer's environment management expert and the Resident Engineer.

4.2. THE ENGINEER'S MEASURES

As specified in the monthly and quarterly reports on progress of measures specified in EMP, in the reporting period the Engineer implemented 1 mitigating measure (1%) (together with the Contractor and the Employer, i.e. item 137, regarding monthly EMP meetings).

4.3. THE EMPLOYER'S MEASURES

As specified in the monthly and quarterly reports on progress of mitigating measures specified in EMP, in the reporting period the Employer implemented 1 mitigating measure (1%), together with the Contractor and the Engineer, i.e. item 137, regarding monthly EMP meetings.

4.4. MATTERS RELATED TO IMPLEMENTATION OF THE MITIGATING MEASURES FROM ANNEX 1 TO EMP

As specified in the monthly and quarterly reports on progress of implementing the measures specified in EMP, in the reporting period the following problems and / or non-compliances regarding implementation of 42 mitigating measures specified in Annex 1 to EMP for Contract 1A.2 were encountered (in the order of their numbering in Annex 1 to EMP). Breakdown of specific mitigating measures with notes on their progress during the term of the Contract is presented in Appendix 1 hereto: Part I. Checklist of the Contractor's implementation of the mitigating measures listed in Annex 1 of the Environmental Management Plan (EMP).

Measures specified as not being implemented (N/N) from September 2021 to August 2023 (measures not being implemented presented in the EMP numbering order):

- Items 5 and 6 (August 2022) – Principles of locating temporary acquisitions

On 10.08.2022, the Engineer stated that the Contractor had taken new temporary occupation sites at the pumping station in the Krajnik Sub-Task without the opinion of the supervision. The Contractor finally submitted opinions with a report for the month of August. The Engineer did not accept the temporary occupation before starting to use. Based on the information from the submitted opinion of the Contractor's environmental supervision and the knowledge of the Engineer, the situation did not affect the environment/Contract. The Engineer recommended that places of temporary occupation be reported before use.

- Item 13 (August 2022) – Limiting the works for protection of species

During an inspection on 30 Aug 2022 the Engineer identified damage of *Angelica archangelica*, a protected plant. The Contractor performed the damage pursuant to an invalid derogation decision dated 26 Aug 2022. The circumstance had no actual impact on the environment due to obtaining approval from relevant institution, although, from a formal point of view, it was unlawful. The Engineer recommended improving coordination of the Contractor's and the Contractor's environmental supervision team's activities related to works pursuant to derogation decisions.

- Item 92 (June 2022) – Prohibition of fueling vehicles at the construction site

During an inspection on 14 Jun 2022 the Engineer identified fueling of a vehicle from a mobile fueling station under Piasek Sub-Task. The Engineer's Inspector immediately reported the circumstances to the Contractor, the Contractor provided confirmation of full implementation of the measure. The circumstance had no actual impact on the environment / Contract. The Engineer recommended increasing supervision over subcontractors' activities.

Measures specified as being implemented partially (PI) from September 2021 to August 2023 (presented in the order assigned in EMP):

- Item 1 (November, December 2021) Preparatory works preceding proper works' commencement

The Contractor submitted Work and Site Organization Plan for the Sub-Task in Piasek and Site and Facilities Layout Plan for specific Sub-Tasks. For November and December 2021 the measure was given the PI status due to documentation acceptance process in progress and incompleteness of the preparatory works. The circumstance had no actual impact on the environment / Contract.

- Item 2 (February 2022, June 2022, September 2022) – Principles of locating temporary acquisitions

In the indicated periods, the Engineer noted non-compliance in the implementation of the measure in the form of storing building materials under the tree crowns in the Sub-Tasks: Krajnik, Piasek, Gryfino. No damage to the trees or their death was found. The Contractor corrected the storage location after the comment was submitted. The situation has no relevant impact on the environment and the terms and conditions of the Contract.

- Item 5 and 6 (November, December 2021, February, March 2022) – Principles of locating temporary acquisitions

In the indicated periods, the Engineer found non-compliance in the performance of the position, consisting primarily in the Contractor's occupation of new places of temporary occupation without providing the appropriate documentation and the Engineer's approval. The Engineer immediately notified the Contractor of the non-compliance, who presented relevant documents, including positive opinions of the Contractor's Environmental Supervision (place of temporary occupation located outside the boundaries of valuable natural habitats or habitats of protected species). The non-compliance had no relevant impact on the environment.

- Item 10 (September - November 2021) - Preparing a one-off inventory before commencing the works

The Contractor submitted the one-off nature inventory in October 2021. From months September - October 2021 the measure was given the partial implementation status due to incomplete consultations with CE. The situation had no relevant impact on the environment and Contract delivery terms.

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- Item 11 (November 2021) - Obtaining necessary permits to derogate from bans regarding protected species

The Contractor's environmental supervision team confirmed the need to obtain RDEP's permit to move amphibians and reptiles. The application was sent to the institution only in December 2021. Partial implementation because of no action (submitting the application) was taken in November. The situation had no relevant impact on the environment and Contract delivery terms.

- Item 12 (August - September 2022) - Preventing spreading of invasive plants

In August and September 2022, the Engineer noted non-compliance in the marking and slight interference in the sites of the *Impatiens glandulifera* in the Piasek Sub-Task, due to the scope of interference and the location (close proximity to the buildings) the circumstance did not have a significant impact on the environment (no spread was found). The Contractor introduced additional marking of the plant's position.

- Item 15 (May 2022, August 2022, April 2023) - Minimizing the number of killed animals

In the indicated periods, the Engineer found during his inspections non-compliances in the implementation of the position, consisting in the lack of herpetological fencing, leaks in the fence and the lack of appropriate shape of the excavation walls in the Piasek Sub-Task. Each time, the Engineer immediately notified the Contractor of any non-compliances. The Contractor remedied the non-compliances. The non-compliances had no relevant impact on the environment (no dead animals were found in the trenches).

- Item 16 (February - March 2022) - Protection of plants outside the construction site

In February 2022, in the Piasek Sub-Task, the Engineer noted an incident involving the destruction of a fragment of land occupied by vegetation characteristic of wetland habitats. The community regenerated itself in the spring.

In March 2022, in the Krajnik Sub-Task, the Engineer noted an incident involving damage to bushes in the vicinity of a trench for cables, the Engineer recommended that the shrubs be undercut in compliance with good practice, minimizing the cutting surfaces. The event has no significant impact on the environment (no vegetation death has been found) and the terms of the Contract.

- Item 34 (January 2022) - Principles of storing topsoil

The Contractor piled topsoil. In January 2022 provisions of the clause were breached. Some (little) topsoil was used for bedding a machine platform (Piasek). After the identification by the Contractor's environmental protection team, the Contractor immediately moved the topsoil to the storage site and piled in correctly.

The situation had no relevant impact on the environment and Contract delivery terms.

- Item 35 (March - April 2022) - Principles of storing soil

In the indicated period, improper storage of humus (under tree crowns) was found. The Contractor was immediately notified of the situation and removed the material from under the treetops. The non-compliance has no relevant impact on the environment (no tree deaths were detected).

- Item 44, 47 (November - December 2021) - Terms of using access roads to the site, including their surroundings

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Before starting the works the Contractor consulted road Operators and submitted traffic route plans in Piasek and Gryfino for CE's approval. For November and December 2021 the measure was given the partial implementation status due to the ongoing process of agreeing necessary documents with CE. The situation had no relevant impact on the environment and Contract delivery terms.

- Item 48 (December 2022) - Obligation to maintain access roads clean

During an inspection of the construction site of Piasek Sub-Task in December 2022 the Engineer identified contamination road surface caused by traffic of machinery and vehicles used for the Sub-Task. The Engineer reported it to the Contractor. The Contractor took actions to clean the road. The situation had no relevant impact on the environment and Contract delivery terms.

- Item 56 (July, August, October, November, December 2022 and May, June 2023) - Obligation to keep the premises clean

In the indicated periods, the Engineer noted disorder and disarray in the area of each of the Sub-Tasks during the inspections. Each time, the Engineer reported to the Contractor the incomplete implementation of the measure, calling for the removal of the non-compliances. The contractor also cleaned up the construction site each time.

The situation did not have any relevant impact on the environment and the terms of the Contract.

- Items 60, 61, 62 (November, December 2022) - Waste handling principles (waste storage)

In November and December 2022 The Engineer found improper accumulation of hazardous waste in the back room in Piasek (containers of waterproofing). The circumstance was immediately reported to the Contractor's representative, the Contractor changed the method of waste storage. The circumstance had not impact on the environment and the Contract delivery terms.

- Item 66 (November 2021 - July 2023) - Waste handling principles (waste sorting, concluding relevant waste collection contracts)

The Contractor concluded a contract for collecting mixed waste. The contract was submitted to the Engineer. For reasons beyond the Contractor's control, i.e. no sorted waste collection business servicing the Piasek area, collection of sorted waste at Piasek construction site is not possible. Mixed municipal waste is collected from the Contractor by authorized entities, while construction waste is collected partially by individuals and partially disposed-of on-site according to the principles specified in the waste act. The Contractor independently implemented sorted waste handling policies and handed over bagged sorted waste together with mixed waste to specialized companies. The solution was recommended by the Engineer. The situation had no relevant impact on the environment and Contract delivery terms.

- Item 74 (January 2023) - Securing trees and shrubs not planned to be cleared

In January 2023, during the inspection, the Engineer noted the lack of protection of trees growing along the ditch, which was being cleared, as a result of the work carried out, 4 trees were damaged. The situation was reported to the Contractor's representative present at the construction site. The contractor secured the damage. The circumstance had no impact on the environment (the damaged trees did not die).

- Item 75 (January 2022) - Procedures for tree damage cases

In January 2022. During his inspection, the engineer found that as a result of the work carried out, the tree trunk in the commercial stand was damaged. Due to the small scale of the damage, the Contractor's

environmental supervision did not find it necessary to carry out maintenance activities. The circumstance had no impact on environment (the damaged tree did not die).

- Item 78 (November - December 2021) - Survey of illegal sewage dumps before starting the works

In the indicated period, the Engineer, as a result of the analysis of the submitted documentation, concluded that the Contractor did not submit information on possible illegal sewage discharges on the construction site. The Contractor immediately presented the relevant document (no illegal sewage discharges were found on the construction site).

- Item 82 (July 2022) - Parking space for machinery and equipment used at the site

During an inspection in July 2022, the Engineer found that the machines were parked in an unsecured area in the Gryfino Sub-Task. The Engineer reported to the Contractor the incomplete implementation of the measure and called for the removal of the non-compliance. The contractor secured the ground at the place where the machines were parked at the beginning of the next reporting period. The situation had no relevant impact on environment (no leakage of hazardous substances or other soil contamination was found).

- Item 83 (April, June 2022) - Failure impact minimization

In April 2022 the measure was being partially implemented due to a non-compliance identified for Gryfino Sub-Task, i.e. missing sorbent. The Contractor recommended replenishing the resources.

A non-compliance was identified in June 2022: missing sorbent at the mobile fueling station for construction machinery under Piasek Sub-Task. The Engineer requested the Contractor to remedy the non-compliance and the Contractor fully complied with the request.

The situation had no relevant impact on the environment and Contract delivery terms.

- Item 84 (September, October 2021) - Procedures for spillage cases

The Contractor submitted the spillage procedure on 5 Oct 2021. For September and October 2021 the measure was given the partial implementation status due to the ongoing process of agreeing the document with CE.

The situation had no relevant impact on the environment and Contract delivery terms.

- Item 86 (April, December 2022) - Storage of hazardous materials and fuels

During the indicated periods, the Engineer found improper storage of hazardous materials, including fuels, during his inspections. The circumstance was immediately reported to the Contractor's representative, the Contractor changed the method of storage and storage of hazardous materials. The circumstances had no relevant impact on the environment (no leakage of hazardous substances was recorded).

- Item 89 (April, June, August 2022) - Furnishing of construction equipment fueling places

In the indicated periods, the Engineer during his inspections found improper storage of fuels and lack of sorbent. The circumstance was immediately reported to the Contractor's representative, the Contractor changed the method of fuel storage and replenished the sorbent. The above circumstances had no relevant impact on the environment (no leakage of hazardous substances was recorded).

- Item 101 (September, October, November 2021) - Inventory of buildings exposed to possible damage

On 06.10.2021 The Contractor carried out an inventory of roads, adjacent areas and buildings on Sub-Tasks I, III and IV. A description of the condition of the acquired land along with photographic documentation was

included in the document entitled: "Description of the technical condition of roads and buildings with a photographic inventory". Partial implementation due to the lack of acceptance of the document by the CE in the reporting period.

The situation had no relevant impact on the environment and Contract delivery terms.

- Item 102, 103 (September, October 2021) - Inventory of the infrastructure exposed to potential damage

On 06.10.2021 the Contractor carried out an inventory of roads, adjacent areas along with infrastructure exposed to damage – Sub-Tasks I, III and IV. A description of the condition of the acquired area along with photographic documentation is included in the document entitled: "Description of the technical condition of roads and buildings with a photographic inventory".

Partial implementation due to the lack of acceptance of the document in the reporting period.

The situation had no relevant impact on the environment and Contract delivery terms.

- Item 114 (January, March 2022) - Securing the Implementation Area

In January 2022 the Contractor marked the construction site in Piasek with information boards; during an inspection the Engineer identified a non-compliance relating to the number of the boards.

During an inspection in March 2022 the Engineer identified the need to refurbish specific information boards for Piasek Sub-Task and communicated that to the Contractor's representative taking part in the inspection. The situation had no relevant impact on delivery terms of the Contract.

- Item 115 (September 2022) - Organizational requirements regarding health and safety

During an inspection in September 2022, the Engineer noted a non-compliance at the construction site of the Gryfino Sub-Task - the Contractor did not secure the sewage manholes, which posed a risk of falling in. The Engineer reported the non-compliance to the Contractor who secured the manholes.

The incident did not cause any dangerous situations, no accidents involving bystanders or persons involved in the performance of the Contract were found.

- Item 117 (August 2022) - Obligation to review and restore construction site marking

During an inspection in August 2022, The Engineer noted damaged plaques at the construction site in Piasek. The Engineer notified the Contractor of the identified non-compliance, and the Contractor provided information on the full implementation of the measure. The circumstance did not affect the Contract (no accidents were found on the construction site).

- Item 121 (November 2022) - Fire protection

During an inspection of a construction site in November 2022, an environmental expert from the CE noted a bonfire lit by workers in the southern part of the Piasek Sub-Task. The circumstance was reported to the Contractor, who immediately took action to extinguish the fire. The circumstance had no relevant impact on Contract or the environment.

- Item 122 (September – December 2021) - Quality assurance plan

During the indicated period, arrangements were made between the Contractor and the Engineer regarding the submitted Quality Assurance Plans (lack of final approval of the Engineer). Non-compliance shall have no actual impact on the Contract.

- Item 123 (January 2022) - Evacuation plan

During the indicated period, arrangements were made between the Contractor and the Engineer regarding the submitted Evacuation Plan (no final approval of the Engineer). The circumstance had no relevant impact on Contract or the environment.

- Item 124 (September - November 2021) - Construction site organization principles

In the indicated period, arrangements were made between the Contractor and the Engineer regarding the submitted documentation related to the development of the construction site and construction facilities (lack of final approval of the Engineer). The circumstance had no relevant impact on Contract or the environment.

- Item 125 (September - October 2021) - Procedures for flood risk situations

During the indicated period, arrangements were made between the Contractor and the Engineer regarding the submitted Flood Protection Plan (no final approval of the Engineer). The circumstance had no relevant impact on Contract or the environment.

- Item 130 (May 2022) - Obligation to prepare a risk management plan

During the indicated period, arrangements were made between the Contractor and the Engineer regarding the submitted risk management plan (lack of final approval of the Engineer). The circumstance had no relevant impact on Contract or the environment.

- Item 131 (September - November 2021) - Preventing HIV-AIDS and other infectious diseases such as COVID 19

In the indicated period, the Engineer, as a result of verification of the documentation presented by the Contractor, as well as an inspection at the construction site, concluded that the Contractor did not direct the information campaign also to the local community. The Engineer notified the Contractor of the non-compliance. The Contractor immediately took action, expanding the scope of the campaign (posters in places accessible to the local community near the construction site).

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

5. IMPLEMENTATION PROGRESS OF THE MONITORING MEASURES FROM ANNEX 2 TO EMP

According to Annex 2 to EMP for Contract 1A.2, PIU, Contractor and the Engineer are the entities responsible for implementation of the monitoring measures specified in Annex 2 to EMP. In total, EMP specifies 149 monitoring measures for Contract 1A.2. Breakdown of monitoring measures' implementation is presented in Appendix 1 hereto: Part II. Checklist of the implementation of monitoring measures by the Contractor and Engineer listed in Annex 2 of the EMP.

5.1. THE CONTRACTOR'S ACTIVITIES

In the reporting period, the Contractor monitored implementation of the mitigating measures specified in Annex 2 to EMP. The monitoring was carried out by:

- Verification of the requirements set out in EMP for the current stage of works;
- Verification of the documents regarding implementation of EMP conditions;
- Current inspections of the construction sites;
- Measures specified in Annex 2 to EMP;

- Current arrangements with representatives of the Engineer and the Employer;

In the reporting period, the Contractor implemented 149 (100%) monitoring measures, including: 149 measures (100%) implemented as required in the reporting period (items 1-149 in Annex 2 to EMP);

The monitoring measures were implemented by the Contractor with the specialists from the Contractor's Natural Environment Team, including EMP Coordinator, OHS inspector, ordnance disposal and archaeological supervision teams.

5.2. THE ENGINEER'S ACTIVITIES

In the reporting period, the Engineer monitored implementation of the mitigating measures specified in Annex 2 to EMP. The monitoring was carried out by:

- Verification of the requirements set out in EMP for the current stage of works;
- Verification of the Contractor's and Investor's documents regarding the implementation of EMP conditions;
- Current inspections of the construction sites;
- Measures specified in Annex 2 to EMP;
- Current arrangements with representatives of the Contractor and the Investor.

In the reporting period, the Engineer essentially implemented 149 (100%) monitoring measures, including:
a) 149 measures (100%) implemented as required in the reporting period (items 1-149 in Annex 2 to EMP);

The monitoring measures were implemented on behalf of the Engineer's team by the environment management expert, cooperating in the respect with the Resident Engineer.

5.3. MATTERS RELATED TO IMPLEMENTATION OF THE MONITORING MEASURES FROM ANNEX 2 TO EMP

As specified in the monthly reports on progress of implementing the measures specified in EMP, no problems were identified regarding implementation of the monitoring measures specified in Annex 2 to EMP for Contract 1A.2 in the reporting period. It was also confirmed by the Engineer's monitoring measures.

6. OTHER ACTIVITIES AND INCIDENTS CONCERNING THE ENVIRONMENT, LOCAL COMMUNITY, HEALTH AND SAFETY

During the implementation of the Task, the Contractor implemented a number of requirements in the field of ESHS (environmental, social, health and safety aspects), which are regulated by national regulations regulating the issues of environmental protection, occupational health and safety and labour law.

No cases of non-compliance with the requirements of the Contract were found in this respect. There were no accidents, in particular cases of contamination of land or water with petroleum derivatives or substances hazardous to the environment, related to the performance of works or resulting from the performance of the Contract, as well as no crisis situations that would require extraordinary intervention measures. Moreover, during the term of the Contract, there were no complaints or conflicts on the part of the Contractor's employees regarding possible violations of employee rights, pay, discrimination or inappropriate forms of behaviour of persons employed in the performance of the Contract, including sexual harassment and mobbing. During the implementation of the Contract, only three complaints from the social side were recorded. Residents of houses located in the area of the works in the Piasek Sub-Task (houses no. 28, 25, 23). The complaints were reported on 25.10.2022. Property owners reported dampness in the walls of the buildings (two cases) and water in the basement. The engineer immediately inspected the reported circumstances. Measurements of the surface water table in the vicinity of the property and in the basement of the building were made. The permeability of the drainage network on the vent side of the flood wall was checked. As a result of the activities carried out, it was determined that the dampness of the walls and the appearance of water in the basement was not the result of the construction works. Until the end of the term of the Contract, no similar circumstances were recorded, the Contractor remained in constant contact with the property owners. At the same time, during the performance of the Contract, there were no extraordinary events, threats or catastrophes caused or resulting from the performance of the Contract, resulting in a threat to the environment or to human life and health. There were no health and safety incidents, serious accidents, injuries or other events requiring treatment, or deaths.

6.1. OTHER ACTIVITIES AND INCIDENTS CONCERNING THE ENVIRONMENT OR LOCAL COMMUNITY

In the reporting period, the Contractor conducted preparatory works and proper works under Contract 1A.2, including implementation of specific measures covered by the Environmental Management Plan in the scope assigned to the Contractor.

Furthermore, in the reporting period, the Contractor performed other activities concerning the local community and employees, and related to delivery of Contract 1A.2, such as:

- Protection of adolescent workers employed for delivery thereof.

Throughout the term of the Contract the Contractor employed no adolescent workers younger than 15.

- Improper behavior of persons employed for delivery of the Contract, including sexual harassment or mobbing.

The Contractor ensured work conditions for implementation of the Contract so as prevent cases of mobbing and sexual harassment, and observed labor law, good practice, and work ethics. The Contractor implemented a program for raising awareness of sexual harassment and bullying prevention and prevented such cases by running training courses for its employees. The Contractor also organized an information campaign consisting in providing informative leaflets and offered a mailbox for potential anonymous complaints. Throughout delivery of the Contract, there were no reports regarding misbehavior

of persons employed for delivery thereof related to sexual harassment or mobbing. The Engineer did not identify any report or non-compliance in the respect.

- Ensuring proper welfare conditions and work conditions for persons employed for execution of the Contract, including equal pay for employees performing the same work, irrespectively of their gender, sexual orientation, age, no harassment or discrimination based on gender, sexual orientation, or age, or facilitating enhancement of the employees' professional qualifications.

The Contractor adhered to and observed all the labor law regulations binding in Poland. The Contractor notified the personnel employed at the construction site of the possibility to file complaints regarding work conditions and remuneration by preparing the informative leaflet. Moreover, throughout the term of the Contract, the Contractor offered a mailbox for anonymous submission of potential complaints or requests. The leaflet was made available throughout the whole term of executing the task. Throughout delivery of the Contract, no persons employed for delivery of the Contract reported any non-compliances in the respect.

- Requirements regarding extraordinary risks to the environment and observance of principles specified in the documents prepared before starting the works and their revision, if any.

Executing the task, the Contractor controlled, on an on-going basis, observance of the principles specified in the documents prepared before completion of the works, and in particular: SHP, waste handling plan, flood protection plan for the construction site during the works, spillage procedure, Implementation Plan, and Environmental and Social Risk Management Strategy. The Contractor continuously monitored the risk of flood or other emergencies, including monitoring of media and state information on contamination of the Odra River for risks related to health or life of persons working on the Contract.

6.2. ACTIONS AND INCIDENTS CONCERNING HEALTH AND SAFETY

In the reporting period, the Contractor performed other activities concerning health and safety related to delivery of Contract 1A.2, such as:

- Ensuring protection of safety and health of persons employed for delivery of the Contract, including OHS personnel required by law.

Throughout the delivery of the Contract, the Contractor ensured continuous OHS supervision, i.e. an OHS specialist with qualifications and experience as required by Polish labor law, who regularly inspected the construction site every month. Each OHS inspection was reported. The OHS specialist also ran periodic training for employees.

- Guidelines for preventing such diseases as HIV/AIDS.

The Contractor held training courses for prevention of such diseases as HIV/AIDS or Covid-19. Moreover, the Contractor took other actions to reduce the risk of spreading such diseases in the local community and the Contractor's personnel, including providing the Contractor's office and construction site facilities with preventive measures aimed at containing the spreading of infectious diseases such as COVID-19, providing the employees with leaflets and an informative poster on preventing such diseases as HIV/AIDS as part of a campaign for the local community. Throughout the Covid-19 pandemic, the Contractor observed the social distancing and disinfection standards and implemented internal procedures limiting spreading of the virus and the employees' infection rate by limiting the number of meetings with third parties and replacing them with online meetings, if possible. Furthermore, in the obligatory regime of preventing spreading COVID-19, the Contractor provided the Engineer with information on relevant developments in execution of Contract

1A.2, i.e. the morbidity rate for the Contractor's personnel. Preventive actions, including obligatory monitoring of infections and taking relevant actions for new infections, were taken also by the Contract Engineer and the Employer.

6.3. EXTRAORDINARY EVENTS, NEAR MISSES AND DISASTERS

No extraordinary events, near misses, nor disasters caused by contractual circumstances were reported in execution of the Contract.

However, during the Contract's term contamination of waters of the Odra River and environmental disaster took place. Nonetheless, the situation was not caused by the Contract's execution. On 12 Aug 2022 SWH PW Regional Water Management Authority in Szczecin made a navigation announcement no. 20/2022 informing that in connection with the appearance of dead fish on the Odra Waterway special caution should be exercised during navigation until the circumstances are resolved by relevant authorities, the causes are clarified, and results of water sample tests are published. Due to the insignificant scope of contractual works required in the Odra River (Piasek Sub-Task: Kanał Piasek, Krajnik Sub-Task: Kanał Betleja), the circumstance did not affect the Contract.

6.4. ACCIDENTS

No accidents at work were reported throughout the Contract.

7. SUMMARY

This report presents execution of the measures specified in the Environmental Management Plan (EMP) for the following undertaking: Contract 1A.2 of Construction Works: "Flood protection of Gryfino, Ognica, and Piasek village on Odra River. Modernization of Marwicki Polder Stage III - pump station Krajnik" under "Odra - Vistula Flood Management Project (OVFMP).

The report covers activities carried out in the following period:

- from the start date of works under Contract 1A.2 (i.e. from 14 Sep 2021);
- from the date of signing the Final Acceptance (i.e. from 6 Sep 2023).

In the reporting period, the Contractor performed works in the scope covered by the Contract (see the description in chapter 4.1), including implementation of 129 mitigating measures specified in Annex 1 to EMP, monitored 149 items specified in Annex 2 to EMP, and took part in other activities relating the environment, local community, health, and safety.

In the reporting period, the Engineer supervised works under Contract 1A.2, including implementation of specific measures covered by the Environmental Management Plan in the scope assigned to the Engineer, monitored implementation of 149 mitigating measures specified in EMP, and took part in other activities relating to the environment, local community, health, and safety.

In the reporting period, the Employer performed actions assigned to the Employer under Contract 1A.2, including implementation of the measures specified in the Environmental Management Plan in the scope assigned to the Investor, monitored implementation of the mitigating measures specified in EMP, and took part in other events relating to the environment, local community, health, and safety.

Monitoring measures undertaken by the Contractor, the Engineer, and the Employer in the reporting period showed:

- a) implementation of 129 out of the 149 mitigating measures specified in Annex 1 to EMP;
- b) implementation of 149 out of the 149 monitoring measures specified in Annex 2 to EMP.

Breakdown of monitoring measures' implementation is presented in Appendix 1 hereto: Part III. A quantitative summary of the implementation of measures listed in Annexes 1 and 2 of the EMP

8. LIST OF APPENDICES

Appendix 1: Checklist of implementing the measures specified in Annexes 1 and 2 to EMP for Contract 1A.2

Appendix 2: Photo documentation