

**REPUBLIC OF MOLDOVA**

**MINISTRY OF ENERGY**



**Moldova Energy Efficiency Revolving  
Mechanism (MEERM)  
(P510426)**

**ENVIRONMENTAL AND SOCIAL MANAGEMENT  
FRAMEWORK (ESMF)**

**JANUARY 2026**

**Table of Contents**

Abbreviations and Acronyms .....	4
Executive Summary .....	5
1 INTRODUCTION .....	14
2 PROJECT DESCRIPTION.....	15
2.1 Project Development Objective.....	15
2.2 Project components and activities.....	15
2.3. Subprojects Description and Preliminary Selection Process .....	16
2.4 The Project’s Beneficiaries .....	20
2.5 The Project Location .....	21
3 ENVIRONMENTAL & SOCIAL POLICIES, REGULATIONS AND LAWS .....	22
3.1 Legal Framework of Republic of Moldova .....	22
3.2 National Environmental and Social Assessment and Permitting Procedure .....	30
3.2.1 General institutional structure relevant to the project .....	30
3.2.2. Categories of permits relevant to the project .....	30
3.3 World Bank Standards applicable for the Project’s activity .....	34
3.3.1 The World Bank’s Standards.....	34
3.4 Gaps analysis between WB’s Standards and National Framework.....	37
3.5 World Bank Environmental, Health and Safety Guidelines.....	43
4 POTENTIAL ENVIRONMENTAL AND SOCIAL RISK IMPACTS AND STANDARD MITIGATION MEASURES .....	44
4.1 Potential Positive Impacts.....	44
4.2 Potential Risks and Negative Impacts and Mitigation Measures.....	44
4.2.1 Risks and Impacts during the Design and Construction Stages .....	50
4.2.2 Potential Cumulative Impacts .....	56
4.2.3 Risks and Mitigation Measures Specific to Disadvantaged and Vulnerable Groups .....	57
4.2.4 Potential Impacts during the Operation Stage.....	58
5 PROCEDURES AND IMPLEMENTATION ARRANGEMENTS.....	59
5.1 Environmental and Social Risk Management Procedures .....	59
5.1.1 Environmental and Social Screening Procedure .....	61
5.1.4 Disclosure and Consultation .....	62
5.1.5 Implementation and Monitoring .....	62
5.2 Implementation Arrangements .....	64
5.3 Proposed Training and Capacity Building.....	67
5.4 Estimated Budget .....	68
6 STAKEHOLDER ENGAGEMENT, DISCLOSURE, AND CONSULTATIONS .....	68
7 GRIEVANCE REDRESS MECHANISM .....	70
8.1. Definition of GRM .....	70
8.2. GRM scope and use .....	70
8.3. Procedures - Grievance Resolution Framework .....	70
ANNEXES.....	76
Annex 1: Environmental Screening Checklist .....	76

*Moldova Energy Efficiency Revolving Mechanism (MEERM)*

*Environmental and Social Management Framework*

<b>Annex 2: Social Screening checklist.....</b>	<b>81</b>
<b>Annex 3: Site Specific Environmental &amp; Social Management Plan (ESMP) Checklist.....</b>	<b>82</b>
<b>for Construction and Rehabilitation Activities .....</b>	<b>82</b>
<b>Annex 4: Site Specific Environmental &amp; Social Management Plan (ESMP) Content .....</b>	<b>87</b>
<b>Annex: 5 Abbreviated Livelihoods Restoration Plan (LRP) .....</b>	<b>93</b>
<b>Annex 6: Labor Management Procedures .....</b>	<b>97</b>
<b>Annex 7: Requirements and measures when handling asbestos .....</b>	<b>112</b>
<b>Annex 8: Chance Find Procedure .....</b>	<b>114</b>
<b>Annex 9. Template for Temporary Relocation Plan .....</b>	<b>117</b>
<b>Annex 10. ESMF Public consultation report .....</b>	<b>120</b>

**List of Tables**

Table 1. Project Components .....	15
Table 2. Typology of buildings, works and potential risks.....	16
Table 3. The list of potential measures under the Project proposal.....	18
Table 4. National legal framework on the environment, constructions and energy .....	22
Table 5. Relevant Social, Anti-Discrimination and Transparency in Decision-Making Legal Framework ..	29
Table 6.Relevant World Bank ESSs applicable to the planned activities under the Project .....	34
Table 7. The GAPS analysis of WB's requirements and national legislation .....	38
Table 8. Risk category assessment and mitigation measures .....	46
Table 9. Environmental and Social Impact Analysis and Core Mitigation Strategies.....	51
Table 10. Project Cycle and E&S Management Procedures .....	59
Table 11. Implementation Arrangements .....	65
Table 12. Proposed Training and Capacity Building Approach .....	67

**Moldova Energy Efficiency Revolving Mechanism (MEERM)  
Environmental and Social Management Framework**

**Abbreviations and Acronyms**

CNED	National Center for Sustainable Energy
C-ESMP	Contractor’s Environmental and Social Management Plan
CPF	Country Partnership Framework
C-LMP	Contractor’s Labour Management Plan
EE	Energy efficiency
EERF	Energy Efficiency Revolving Fund
EHSG	Environmental, Health, and Safety Guidelines
ESMF	Environmental and Social Management Framework
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
EU	European Union
GD	Governmental Decision
GoM	Government of Moldova
GBV	Gender Based Violence
GHG	Greenhouse gases / Net greenhouse gas
GRM	Grievance Redress Mechanism
IHS	Individual Heating Substation
LC	Labour Code of the Republic of Moldova
LMPs	Labour Management Procedures
LPAs	Local Public Authorities
MoE	Ministry of Energy
MJ	Mega Joules
NAA	National Archaeological Agency
NECP	National Energy and Climate Plan
NGO	Non-governmental organization
OIPs	Other Interested Parties
OHS	Occupational Health and Safety
PAPs	Project Affected Parties / Persons
PBCs	Performance-Based Conditions
PDO	Project Development Objective
PPA	Public Property Agency
RE	Renewable Energy
RES	Renewable Energy Sources
SEP	Stakeholder Engagement Plan
WB	World Bank

## **Executive Summary**

The World Bank will support the Republic of Moldova in implementing the Moldova Energy Efficiency Revolving Mechanism (MEERM) Project.

The present project defines the continuation of WB and the Government of Moldova's efforts and commitment to address energy security cost-effectively, while contributing to combat climate change and address energy poverty. The project builds upon the results of "Sustainable Transition Through Energy Efficiency Project in Moldova (STEEM)" supported by donor partners under the Moldova Energy Efficiency Program in Public Buildings, which addresses the Country Partnership Framework (CPF) call for an urgent nationwide focus on efficient energy use.

The **Project Development Objective (PDO)** is to improve energy efficiency in public buildings and introduce a sustainable financing mechanism for Energy Efficiency.

The following indicators will measure the progress towards achieving the PDO:

- a) Projected lifetime energy savings from EE investments in public buildings (GWh).
- b) Reduced emissions for heating in public buildings (Mtoe).
- c) Operationalization of a revolving mechanism (Yes/No).

**The proposed project would support the establishment and operationalization of an Energy Efficiency Revolving Fund (EERF) to finance energy efficiency in public buildings**, with CNED acting as the Implementing Agency. The project will establish a revolving mechanism that enables public buildings to benefit from energy-efficient renovations in a financially sustainable way. The savings generated from these energy efficiency upgrades will be reused to scale up the program and expand its coverage to target other buildings.

Through a time-bound nomination approach, eligible buildings would be selected for Energy Efficiency retrofitting, and the EERF – implemented by CNED - would provide a full-service pathway to support this. Pipeline development could start with an outreach and screening exercise by CNED, supported by the proposed project, to confirm eligibility and aggregate demand. CNED have a database of buildings for which it could undertake walk-through energy audits to confirm eligibility and estimate investment costs and potential energy savings. The process by which the selection of buildings will be set out in the Project Operations Manual and could look to bundle multiple facilities per round to improve efficiency and reduce costs.

A detailed energy audit would then be procured by CNED. To define the baseline, identify measures (e.g., lighting, HVAC, and envelope upgrades), estimate savings, and develop detailed designs. These would then inform the procurement of the physical retrofitting works and associated renewable energy capacity, if needed. CNED would also, through the project, be able to support associated safeguard measures, such as stakeholder consultations, through the EERF.

The proposed repayment mechanism would be anchored in deemed energy cost savings through "budget capture". This, whereby the Ministry of Finance would reduce energy budget transfers by the deemed savings – which would be quantified, and a payment schedule set out in the Energy Service Agreement. The Ministry would then remit that amount directly to the EERF dedicated account, improving enforceability and minimizing payment risk. As repayments flow in, they replenish the EERF, enabling it to finance subsequent projects, progressively scale the program, and over time could potentially transition to risk-sharing instruments that mobilize private capital. In parallel, the EERF would carry out Measurement and Verification (M&V) of energy saving to validate assumptions, identify operational issues and guide corrective actions, and build capacity for sound M&V to enable performance-based contracts and ESCOs in the future.

**Moldova Energy Efficiency Revolving Mechanism (MEERM)  
Environmental and Social Management Framework**

The MEERM Project will finance the following activities grouped into the following components and subcomponents:

**Major project components include:**

<p><b>Component 1: Energy Efficiency Investments (US\$48 million – TBC)</b></p>	<p>This component will finance the retrofit of public buildings, owned by Central Public Authorities, which will include: (i) standard energy efficient retrofit measures, such as thermal insulating of wall and roof, replacing windows and doors, renovation of internal heating system and changing the individual heat point, and replacement of lighting, using well proven technologies and equipment for energy efficiency improvements in end-use application, and (ii) if technically feasible and economically viable, advanced energy technologies for space heating, such was heat pumps or solar thermal collectors, and rooftop solar PV to cover own electricity demand. This component will also include the EE retrofitting of selected shelters for female survivors of GBV currently being supported by the World Bank WEGS project (P168790). Specific measures for each subproject will be determined based on professional energy audits and designs. This component will also finance necessary energy audits, designs, associated studies and M&amp;V to inform the works and help quantify energy savings.</p>
<p><b>Component 2: Technical assistance and project management (US\$4 million - TBC).</b></p>	<p>This component would consist of two subcomponents:          (a) Subcomponent 2a. Project implementation support (US\$3 million IBRD): This subcomponent would cover subproject development costs such as marketing and outreach, screening of subproject candidates, and review of energy audits and technical designs; day-to-day project management such as preparation and management of procurements, contract management, and supervision of renovation works; implementing financing requirements in compliance with the Bank’s fiduciary policies and guidelines; ensuring satisfactory implementation of the Bank’s Environmental and Social Framework (ESF); Project monitoring and evaluation (M&amp;E); equipment needed for day-to-day project implementation; incremental operational costs; support for early subprojects such as expert advice on implementation of M&amp;V and ESAs; training of building administrations on disaster and climate-related risks- with a focus on local hazards, emergency preparedness, and resilience.          (b) Subcomponent 2b. Technical Assistance (US\$1 million MGROW grant): This subcomponent would further support development of the Energy Audit Information System, approved by GD nr. 144/2025 (SI Audit Energetic) and the Energy Management Information System (SI Managementul Energetic), Technical Assistance to move towards the Super-ESCO model, project communications and dissemination of results, and capacity building and knowledge sharing for CNED staff, service providers such as energy auditors and designers, construction firms, ESCOs, building administrators, and any other relevant project stakeholders.</p>

***Moldova Energy Efficiency Revolving Mechanism (MEERM)  
Environmental and Social Management Framework***

Under **Component 1** the project will finance the retrofit of public buildings, owned by Central Public Authorities, which will include: (i) standard energy efficient retrofit measures, such as thermal insulating of wall and roof, replacing windows and doors, renovation of internal heating system and changing the individual heat point, and replacement of lighting, using well proven technologies and equipment for energy efficiency improvements in end-use application, and (ii) if technically feasible and economically viable, advanced energy technologies for space heating, such as heat pumps or solar thermal collectors, and rooftop solar PV to cover own electricity demand. Specific measures for each subproject will be determined based on professional energy audits and designs. Technology risk may occur in advanced technology applications on design, installation, and O&M at a moderate level. Capacity building measures will be important to reduce those risks. Limited additional funding (up to 10 percent of total investment costs per subproject) may be provided to finance 'ancillary measures' to ensure reasonably full renovation or longevity of the investment (e.g., replacement of old gutters and down spouts to ensure that building envelopes don't get damaged by water) and a minimum level of improvement of sanitary facilities (i.e. washing rooms).

All buildings are owned or managed by central public authorities (CPA) of the Republic of Moldova and their territorial subdivisions.

The geographical coverage of the project interventions includes only urban areas (towns): the city of Chisinau, and might also include other towns

**Beneficiary criteria that was used at the screening stage / after completing of energy audit**, include: (i) full ownership by a central governmental institution and primary used for public services (administration, or health or education, social, etc.) and the Public agency has full control over energy costs and payment for energy; (ii) preliminary confirmed structural soundness of the buildings (in terms of structural durability and safety of the construction); stability of the building, no seismic and construction damages; (iii) secured prospective use of the facility, and absence of plans for closure or downsizing or privatization; and (iv) the building has been constructed between 1950 and 2005, as it is expected that relatively new buildings have lower demand for retrofit, (v) detached, single use buildings to achieve significant energy savings and enable cost reduction benefits, and (vi) no significant capital repairs or mayor renovation over the last five years, to avoid renewed EE intervention for buildings with already better energy performance.

Based on preliminary project assessment, the types of institutions that will be covered by the specific sub-project activities include the buildings in the public domain of the state, heated and/or cooled, in which the specialized central public administration authorities carry out their activities, among these can be found:

- Administrative Buildings
- Emergency situations inspectorate (IGSU)
- Cultural Centers
- Health institutions
- Educational Institutions
- GBV Shelters
- Temporary placement Center for Children

**Environmental and Social Management Framework.**

This Environmental and Social Management Framework (ESMF) has been prepared according to the World Bank's Environmental and Social Standards (ESSs) and national legislation in order to identify the potential environmental and social risks and impacts of proposed Project activities and set out mitigation measures and actions to manage the Project's environmental and social risks and impacts. The procedure sets out the applicable national laws and regulations and the World Bank related policies to the Project and describes arrangements for the implementation of the environmental and social mitigation measures specific for the Project's life cycle. The ESMF also includes Labor Management Procedures (LMP) applicable to the project. In addition to the ESMF, the project has prepared a Stakeholder Engagement Plan (SEP), which identifies and analyzes the project stakeholders, outlines the engagement strategies in relation to each group of stakeholders including specific measures for vulnerable groups, and describes the project-level grievance redress

**Moldova Energy Efficiency Revolving Mechanism (MEERM)**

**Environmental and Social Management Framework**

mechanism (GRM). The E&S management requirements of the project, including the implementation of the aforementioned instruments, is out in an Environmental and Social Commitment Plan (ESCP) to be agreed between the Government of Moldova and the World Bank and referenced in the Loan Agreement for the project.

**The Project Location:** The geographical coverage of the project interventions includes only urban areas (towns): the city of Chisinau, and might also include other towns. The specific locations of the subprojects will be determined after the process of selecting the beneficiary public institutions will be completed.

**Project Potential Environmental and Social Risks and Impacts:** The project is not expected to have significant adverse environmental or social risks and/or impacts.

The risks and impacts during the construction stage are specific for small-scale construction works, site-specific, temporary, low in magnitude and manageable in a predictable manner through the implementation of cost-effective mitigation measures in line with the national laws as well as the use of the World Bank Environmental & Social Standards (ESS), Environmental, Health, and Safety Guidelines (EHSG) and Good International Industrial Practices (GIIP).

**Proposed Mitigation Instruments:** include i) site-specific risks assessment by using Screening checklist. ESMP Checklists and / or site-specific ESMPs preparation for subproject activities based on performed screening; (ii) implementation of the site-specific mitigation measures for ensuring the community health and safety, such as prior and proper information, including SEA/SH, (iii) implementation of the LMP; (iv) SEP implementation.

**Moldova Energy Efficiency Revolving Mechanism (MEERM)**  
**Environmental and Social Management Framework**

Risk Type	Category	Description	Core Mitigation Strategy
<p><b>Environmental Risks</b></p>	<p><b>Moderate</b></p> <p>Impacts are typically <b>site-specific, predictable, and reversible</b> through standard mitigation measures (C&amp;D waste, noise, dust). The project's overall impact is positive, driven by long-term energy savings and reduced emissions.</p>	<p><b>Construction Waste &amp; Debris Management:</b> Generation of significant construction and demolition (C&amp;D) waste (old insulation, windows, roofing, plaster, etc.), including potentially hazardous materials like asbestos or lead-based paint, which could contaminate soil and water if not handled properly.</p> <p><b>Air and Noise Pollution:</b> Temporary increase in local air pollution (dust, vehicle emissions) and noise levels during the rehabilitation works (drilling, hammering, heavy machinery operation), impacting building occupants and nearby communities.</p> <p><b>Acoustic Impact (Heat Pumps):</b> Advanced energy technologies like air-source heat pumps can generate constant low-frequency noise and vibrations, potentially disturbing building occupants or neighbors.</p> <p><b>Hazardous Electronic &amp; Chemical Waste:</b> Decommissioning old boilers, mercury-containing fluorescent tubes, and old cooling systems (refrigerants) can lead to soil/water contamination if disposed of as regular C&amp;D waste.</p> <p><b>End-of-Life Solar PV Management:</b></p>	<p>Develop a <b>Construction Waste Management Plan (CWMP)</b> requiring contractors to: i) Segregate and manage C&amp;D waste appropriately. ii) Prioritize recycling and reuse of non-hazardous materials. iii) Conduct mandatory screening for asbestos/lead-based paint <i>before</i> demolition/retrofitting. iv) Dispose of hazardous materials in designated, licensed facilities following national and international standards.</p> <p>Implement a <b>Site-Specific Environmental Management Plan (ESMP)</b>. i) Use water suppression for dust control. ii) Restrict heavy construction activities to specified daytime hours (as per local regulations). <b>iii)</b> Require contractors to maintain vehicles and equipment properly to minimize emissions. <b>iv)</b> Provide advance notice to neighbors and building occupants about the work schedule.</p> <p><b>Acoustic Design &amp; Screening:</b> Install units on vibration-isolation pads and use acoustic enclosures or barriers if units are placed near windows or residential boundaries.</p> <p><b>To conduct the specific Hazardous Waste Inventory</b> of all old electrical and HVAC components before removal. Require contractors to use specialized e-waste recyclers and certify the safe recovery of refrigerants (CFCs/HFCs).</p> <p><b>Extended Producer Responsibility (EPR):</b> Include</p>

**Moldova Energy Efficiency Revolving Mechanism (MEERM)  
Environmental and Social Management Framework**

		<p>Future disposal of damaged or expired Solar PV panels and lithium-based storage (if applicable) presents a long-term environmental hazard due to heavy metals.</p> <p><b>Protection of Cultural Heritage:</b> For older public buildings with historical or architectural value, external thermal insulation or window replacement may permanently alter or damage the building's heritage character.</p>	<p>"take-back" clauses in procurement contracts (Component 2) requiring suppliers to reclaim panels at end-of-life. Ensure the ESMP includes specific storage protocols for broken panels during the construction phase.</p> <p><b>Heritage Screening:</b> Perform a "Chance Find" and Cultural Heritage assessment for each building. Use "internal" insulation or heritage-matched materials for buildings with historical significance to maintain architectural integrity.</p>
<p><b>Social Risks</b></p>	<p><b>Moderate</b></p>	<p><b>Occupational Health and Safety (OHS):</b> Risks of accidents, injuries, and health issues for construction workers due to working at heights, handling heavy materials, use of power tools, and exposure to dust or hazardous substances (e.g., during asbestos removal).</p> <p><b>Interruption of Public Services/Access:</b> Retrofitting public buildings (such as institutions, office buildings, and government offices) may temporarily disrupt essential services, restrict public access, or impact the daily activities of users/staff. Retrofitting of buildings of social service providers center and medical institutions as well as in existing GBV shelters may require temporary relocation of beneficiaries and impact daily service provision.</p>	<p>i) Mandatory adherence to strict OHS protocols (e.g., use of Personal Protective Equipment - PPE, safety harnesses, scaffold certification).</p> <p>ii) Ensure all workers receive OHS training and site induction.</p> <p>iii) Establish transparent incident reporting and emergency response procedures.</p> <p>iv) Supervision Consultants (Component 3) must include OHS experts to monitor compliance.</p> <p>i) Develop detailed <b>Construction Work Plans</b> that prioritize continuity of essential services.</p> <p>ii) Schedule disruptive works (e.g., noise-intensive activities) during non-peak hours, weekends, or holidays.</p> <p>iii) Establish clear, safe alternative access routes for staff and the public during construction.</p> <p>iv) Implement a <b>Communication Plan</b> to inform building users and the public about temporary changes.</p> <p>v) <b>The temporary relocation plan for staff / GBV</b></p>

		<p><b>Potential for minor impacts on local business income:</b> Project activities may cause temporary disruptions or physical access restrictions in commercial areas, leading to a minor reduction in daily business revenues.</p> <p><b>Stakeholder and Grievance Management:</b> Concerns or complaints from the public, building users, or contractors regarding project activities, OHS issues, procurement fairness, or compensation (if any minor land access is required).</p> <p><b>Unfair labor practices:</b> Risk of unfair wages, poor working conditions, or non-compliance with national labor laws by contractors hired for the rehabilitation works.</p> <p><b>Sexual Exploitation, Abuse and Harassment risks</b> related to works: concerns or potential complaints from public building workers.</p>	<p><b>shelter residents</b> can be operated in case of longer restrictions of access/impossibility to provide services.</p> <p><b>vi)</b> Develop and implement formal <b>Livelihood Restoration Plans (LRPs)</b> specifically for any instances where project activities lead to a loss or reduction of business income. These plans should outline clear assistance structures and recovery support to ensure economic stability for affected stakeholders.</p> <p><b>i)</b> Establish a transparent and accessible <b>Grievance Redress Mechanism (GRM)</b> at the project and site level, ensuring a clear process for receiving, addressing, and resolving complaints promptly and confidentially.</p> <p><b>ii)</b> Conduct regular <b>stakeholder communication</b> and continuous engagement throughout the project lifecycle.</p> <p><b>i)</b> Ensure labor provisions and codes of conduct are <b>explicitly included</b> in all procurement and contractual agreements (Component 2).</p> <p><b>ii)</b> Require contractors to comply with all national labor laws, including minimum wage, working hours, and non-discrimination.</p> <p><b>iii)</b> Project supervision (Component 3) should include checks on labor compliance.</p> <p><b>SEA/SH</b> are assessed as low and mitigable by complying with the Code of Conduct by all Project’s workers and operation of a grievance mechanism respecting <b>confidential grievances</b>.</p>
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**Moldova Energy Efficiency Revolving Mechanism (MEERM)  
Environmental and Social Management Framework**

		<p><b>Exclusion of Universal Accessibility:</b> Energy retrofits that replace doors and windows may fail to address (or even worsen) physical barriers for Persons with Disabilities (PWD), missing an opportunity for social inclusion.</p>	<p><b>Universal Design Integration:</b> Mandate that all door/entrance replacements comply with international accessibility standards (e.g., width, threshold height). Include PWD advocacy groups in the stakeholder engagement process.</p>
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**Stakeholder Engagement.** Based on ESS 10 requirements, a Stakeholder Engagement Plan (*SEP*) has been developed. The SEP describes the timing and methods of engagement with stakeholders throughout the life cycle of the MEERM, distinguishing between project-affected parties and other interested parties. The SEP also describes the range and timing of information to be communicated to project-affected parties and other interested parties, as well as the type of information to be sought from them.

The results of the stakeholder engagement activities, including Grievance Redress Mechanism (GRM) will be reported quarterly to World Bank and posted on CNED’s website.

**Implementation Arrangements.** The Ministry of Finance (MoF), as the Borrower of the World Bank loan, will enter into an Implementation agreement with the Ministry of Energy, the central administration authority responsible for the project, which will delegate day-to-day implementation to its National Center for Sustainable Energy (CNED). The Public Institution “National Center for Sustainable Energy”, established by Governmental Decision nr. 1060 of 21 December 2023, is the independent legal entity that will act as the lead implementing agency for the project and maintain fiduciary responsibilities for all components, and will ensure efficient project implementation in relation to the MoE’s obligations on social and environmental safeguards, procurement, financial management, and other country-specific requirements such as monitoring and evaluation. A new PIU will be created and staffed with project funds. Procurement and contract management for all technical assistance, studies, and works will be carried out by CNED PIU.

**The implementation entities** will ensure the Project implementation, including monitoring of the implementation of the ESMF, SEP, LPM, and GRM.

**Monitoring and Reporting.** CNED, consulting supervision company/consultant, will regularly monitor the implementation of this ESMF at both the overall Project and subproject levels during construction to ensure proper implementation of the ESMP checklist and site-specific ESMP provisions.

The monitoring will be carried out by establishing weekly or bi-weekly working meetings with the contractors, supervision consultants and final beneficiaries, if necessary, through regular on-site visits by both the technical supervisors and the CNED team.

The supervision process will be complemented by WB supervision of the Project. Based on the review of reporting documentation and field visits, the World Bank may require changes to the risk category and related project documentation, including the ESMP, Project Operational Manual, etc  
CNED will present its findings and monitoring results to the Ministry of Energy and the World Bank in the project progress quarterly reports.

Monthly monitoring reports will be generated by the contractors and/or supervising consultants to reflect the quality and extent of application of each environmental and social mitigation measure prescribed by the site-specific ESMPs/ESMP Checklist.

***Moldova Energy Efficiency Revolving Mechanism (MEERM)  
Environmental and Social Management Framework***

If cases when CNED becomes aware or is informed by contractors or a supervision consultant of a serious incident in connection with the project, which may have significant adverse effects on the environment, the affected communities, the public, or workers, it should notify the World Bank within 48 hours of becoming aware of such incident.

**ESMF disclosure and public consultations**

The Environmental and Social Management Framework (ESMF) and Stakeholders Engagement Plan (SEP) will be disclosed on the CNED web site in English (with summary in Romanian) language for consultation in order to have access stakeholders and other interested parties to the environmental and social information specific for the MEERM Project: <https://cned.gov.md/ro/content/super-esco>

On December 17, 2025, CNED with the support of the Ministry of Energy, organized a public consultation meeting to present and solicit feedback on the project. Prior the event the summary of ESMF was disseminated to key stakeholders. The event was organized in a hybrid format with combined physical and online participation of the participants. In total, **38 participants (16 in room and 22 online) attended the event**. The profile of participants included representatives of central public authorities and line ministries (Ministry of Energy, Ministry of Social Protection and Labour, Ministry of Economic Development and Digitalization, Ministry of Health, Ministry of Energy, Ministry of Environment, National social insurance house (CNAS) General Inspectorate of Police of the Ministry of Internal Affairs, General Inspectorate for Emergency Situations – (IGSU), Environmental Agency, Chamber of Industry and Commerce of Moldova, Trade Union Association, Moldova Energy Projects Implementation Unit (MEPIU), representatives of the Central Public building administration, energy experts. The Public Consultation Report and the summary of the received comments and provided answers are presented further in this document

The final ESMF and SEP will be disclosed on the CNED website and stakeholders participating in the discussions and all interested parties will be invited to submit any additional comments, proposals for improvements, and questions to CNED.

## **1 INTRODUCTION**

This Environmental and Social Management Framework (ESMF) follows the World Bank Environmental and Social Framework (ESF) as well as the legislation and regulations Republic of Moldova in order to properly identify and mitigate the environmental, health and safety and social risks and impacts that can be generated by the planned activities and investment under **Moldova Energy Efficiency Revolving Mechanism Project** (MEERM Project).

The **Project Development Objective (PDO)** is to improve energy efficiency in public buildings and introduce a sustainable financing mechanism for Energy Efficiency.

The progress towards achieving the PDO will be measured by the following indicators:

- (a) Projected lifetime energy savings from EE investments in public buildings (GWh);
- (b) Reduced emissions for heating in public buildings (Mtoe)
- (c) Operationalization of a revolving mechanism (Yes/No)

The project will be implemented by the Ministry of Energy through CNED. A new PIU will be established within CNED to manage the project. Staff with experience in environmental and social management including occupational and community health and safety will be hired or appointed as part of this PIU when project funds become available during implementation.

The objective of the ESMF is to assess and mitigate potential negative environmental and social risks and impacts of the Project consistent with the Environmental and Social Standards (ESSs) of the World Bank ESF and national requirements.

More specifically, the ESMF aims to (a) assess the potential environmental and social risks and impacts of the proposed Project and their activities and propose mitigation measures; (b) establish procedures for the environmental and social screening, review, approval, and implementation of activities; (c) specify appropriate roles and responsibilities, and outline the necessary reporting procedures, for managing and monitoring environmental and social issues related to the activities; (d) identify the staffing requirements, as well as the training and capacity building needed to successfully implement the provisions of the ESMF; (e) address mechanisms for public consultation and disclosure of project documents as well as redress of possible grievances; and (f) establish the budget requirements for implementation of the ESMF.

This ESMF should be read together with other plans prepared for the project, including the Stakeholder Engagement Plan (SEP), the Environmental and Social Commitment Plan (ESCP). Documents can be found at <https://cned.gov.md/ro/content/super-esco>

**2 PROJECT DESCRIPTION**

*2.1 Project Development Objective*

The **Project Development Objective (PDO)** is to improve energy efficiency in public buildings and introduce a sustainable financing mechanism for Energy Efficiency.

*2.2 Project components and activities*

The Project will finance the following activities grouped into two project components:

**Table 1. Project Components**

<p><b>Component 1: Energy Efficiency Investments (US\$48 million – TBC)</b></p>	<p>This component will finance the retrofit of public buildings, owned by Central Public Authorities, which will include: (i) standard energy efficient retrofit measures, such as thermal insulating of wall and roof, replacing windows and doors, renovation of internal heating system and changing the individual heat point, and replacement of lighting, using well proven technologies and equipment for energy efficiency improvements in end-use application, and (ii) if technically feasible and economically viable, advanced energy technologies for space heating, such as heat pumps or solar thermal collectors, and rooftop solar PV to cover own electricity demand. This component will also include the EE retrofitting of selected shelters for female survivors of GBV currently being supported by the World Bank WEGS project (P168790). Specific measures for each subproject will be determined based on professional energy audits and designs. This component will also finance necessary energy audits, designs, associated studies and M&amp;V to inform the works and help quantify energy savings.</p>
<p><b>Component 2: Technical assistance and project management (US\$4 million - TBC).</b></p>	<p>This component would consist of two subcomponents: (a) Subcomponent 2a. Project implementation support (US\$3 million IBRD): This subcomponent would cover subproject development costs such as marketing and outreach, screening of subproject candidates, and review of energy audits and technical designs; day-to-day project management such as preparation and management of procurements, contract management, and supervision of renovation works; implementing financing requirements in compliance with the Bank’s fiduciary policies and guidelines; ensuring satisfactory implementation of the Bank’s Environmental and Social Framework (ESF); Project monitoring and evaluation (M&amp;E); equipment needed for day-to-day project implementation; incremental operational costs; support for early subprojects such as expert advice on implementation of M&amp;V and ESAs; training of building administrations on disaster and climate-related risks- with a focus on local hazards, emergency preparedness, and resilience. (b) Subcomponent 2b. Technical Assistance (US\$1 million MGROW grant): This subcomponent would further support development of the Energy Audit Information System, approved by GD nr. 144/2025 (SI Audit Energetic) and the Energy Management Information System (SI Managementul Energetic), Technical Assistance to move towards the Super-ESCO model, project communications and dissemination of results, and capacity building and</p>

**Moldova Energy Efficiency Revolving Mechanism (MEERM)  
Environmental and Social Management Framework**

	knowledge sharing for CNED staff, service providers such as energy auditors and designers, construction firms, ESCOs, building administrators, and any other relevant project stakeholders.
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**2.3. Subprojects Description and Preliminary Selection Process**

**Beneficiary criteria that was used at the screening stage / after completing of energy audit**, include: (i) full ownership by a central governmental institution and primary used for public services (administration, or health or education, social, etc.) and the Public agency has full control over energy costs and payment for energy; (ii) preliminary confirmed structural soundness of the buildings (in terms of structural durability and safety of the construction); stability of the building, no seismic and construction damages; (iii) secured prospective use of the facility, and absence of plans for closure or downsizing or privatization; and (iv) the building has been constructed between 1950 and 2005, as it is expected that relatively new buildings have lower demand for retrofit, (v) detached, single use buildings to achieve significant energy savings and enable cost reduction benefits, and (vi) no significant capital repairs or mayor renovation over the last five years, to avoid renewed EE intervention for buildings with already better energy performance.

Specific measures for each subproject will be determined based on professional energy audits and designs.

Based on preliminary project assessment, the types of institutions that will be covered by the specific sub-project activities include the buildings in the public domain of the state, heated and/or cooled, in which the specialized central public administration authorities carry out their activities, among these can be found:

- Administrative Buildings;
- Emergency situations inspectorate (IGSU);
- Cultural Centers;
- Health institutions;
- Educational Institutions;
- GBV Shelters;
- Temporary placement Centers for Children.

**Table 2. Typology of buildings, works and potential risks**

<b>Building type</b>	<b>EE typology / works</b>	<b>Potential risks</b>
Administrative Buildings	Installing photovoltaic panels Replacing individual heating points Exterior facade lighting Installing an energy management system Installation of hot water pipes for sanitary rooms	Potential risks can be related to construction and demolition waste, air and noise pollution, Occupational Health and Safety, Interruption of Public Services/Access to buildings. More specifically the risks can include the following:
Emergency situations inspectorate (IGSU)	Heat pump installation Lighting replacement Installation of photovoltaic panels and storage battery	(a) waste management including hazardous waste (potentially of asbestos containing material, old isolation materials, ODS leakage risks) during construction works;
Cultural Centers	Thermal insulation of external walls Replacing windows Replacing external doors Roof thermal insulation	(b) occupational health and safety of workers;

**Moldova Energy Efficiency Revolving Mechanism (MEERM)  
Environmental and Social Management Framework**

	<ul style="list-style-type: none"> <li>Renovating the heating system</li> <li>Replacing lighting</li> <li>Installing photovoltaic panels</li> <li>Replacing individual heating points</li> <li>Exterior facade lighting</li> <li>Installing an energy management system</li> </ul>	<p>(c) community health and safety of residential population, staff, personnel, and visitors during construction works;</p> <p>(d) disruption of regular activities as a result of construction noise or dust pollution and for trimming of trees/branches safely for roof related works;</p> <p>(e) traffic disruption in residential areas (depending upon specific location), transport and traffic safety at construction sites.</p>
Health institutions	<ul style="list-style-type: none"> <li>Thermal insulation of external walls</li> <li>Windows replacement</li> <li>Roof thermal insulation</li> <li>External door replacement</li> <li>Heating system replacement</li> <li>Lighting replacement</li> <li>Installation of photovoltaic panels and storage battery</li> <li>Lighting replacement</li> <li>Individual heat point replacement</li> </ul>	
Educational Institutions	<ul style="list-style-type: none"> <li>Thermal insulation of external walls</li> <li>Replacing windows</li> <li>Replacing external doors</li> <li>Roof thermal insulation</li> <li>Renovating the heating system</li> <li>Replacing lighting</li> <li>Installing photovoltaic panels</li> <li>Replacing individual heating points</li> <li>Exterior facade lighting</li> <li>Installing an energy management system</li> </ul>	
GBV Shelters	<ul style="list-style-type: none"> <li>Thermal insulation of external walls</li> <li>Replacing windows</li> <li>Replacing external doors</li> <li>Roof thermal insulation</li> <li>Renovating the heating system</li> <li>Replacing lighting</li> <li>Installing photovoltaic panels</li> <li>Replacing individual heating points</li> <li>Exterior facade lighting</li> <li>Installing an energy management system</li> </ul>	
Temporary placement Center for Children	<ul style="list-style-type: none"> <li>Thermal insulation of external walls</li> <li>Replacing windows</li> <li>Roof insulation</li> <li>Replacing external doors</li> <li>Basement insulation</li> <li>Replacing the heating system</li> <li>Replacing lighting</li> <li>Installing photovoltaic panels</li> <li>Installing heat pumps for hot water</li> </ul>	

Limited additional funding (up to 10 percent of total investment costs per subproject) may be provided to finance 'ancillary measures' to ensure reasonably full renovation or longevity of the investment (e.g., replacement of old gutters and down spouts to ensure that building envelopes don't get damaged by water) and a minimum level of improvement of sanitary facilities (i.e. washing rooms).

**Table 3. The list of potential measures under the Project proposal**

Stage	Description	Measures
<b>1. Auditing, planning, and management works</b>	These are the necessary preparatory and organizational steps that ensure the success and long-term sustainability of physical work.	<ul style="list-style-type: none"> <li>• Detailed energy audits - comprehensive investigation to assess the existing energy consumption profile, identify heat losses (often using thermographic cameras), and quantify cost-effective EE opportunities.</li> <li>• Building renovation passport (BRP) or roadmap development- creating a building-specific, multi-stage renovation plan that outlines the necessary EE measures, costs, expected savings, and alignment with national targets (like the Long-Term Building Renovation Strategy).</li> <li>• Feasibility studies and financial engineering - analysis to determine the optimal investment strategy, including the potential for innovative financing mechanisms like energy performance contracts (EPCs) and revolving funds.</li> <li>• Measurement and verification (M&amp;V) system implementation- setting up monitoring software and protocols to track, measure, and verify the actual energy savings achieved post-renovation.</li> <li>• Energy management system (EnMS) deployment - implementing energy management processes and smart technologies for continuous monitoring and optimization of the building's operation.</li> <li>• Capacity building and training - training for public building operators and facility managers on the new high-efficiency systems and ongoing maintenance procedures (operation &amp; maintenance - O&amp;M).</li> </ul>
<b>2. Building envelope works (reducing heat loss)</b>	These works focus on the building's fabric (the envelope) to drastically reduce the energy demand for heating and cooling.	<ul style="list-style-type: none"> <li>• Thermal insulation of walls - installation of high-performance <i>external thermal insulation composite systems</i> (ETICS) on the façade, using materials like mineral wool or expanded polystyrene, to minimize heat transfer.</li> <li>• Roof and attic insulation - applying high levels of thermal insulation to the roof structure or attic floor to prevent heat loss/gain through the top of the building.</li> <li>• Basement/floor insulation - insulating floors over unheated spaces (like basements or ground floors) to cut off cold transfer.</li> <li>• Window and door replacement - installation of high-performance, energy-efficient windows and doors (e.g., triple-pane glass, low-emissivity coatings, insulated frames) to eliminate drafts and reduce conductive heat loss.</li> <li>• Air sealing and thermal bridge mitigation - identifying and sealing air leaks around openings, junctions, and penetrations, and addressing thermal bridges (areas with higher heat flow, like balcony slabs) to ensure a continuous thermal barrier.</li> </ul>

**Moldova Energy Efficiency Revolving Mechanism (MEERM)  
Environmental and Social Management Framework**

<p><b>3. Systems and control upgrades (improving efficiency)</b></p>	<p>These works replace or optimize the mechanical, electrical, and plumbing (MEP) systems to ensure the remaining energy demand is met efficiently and from low-carbon sources.</p>	<ul style="list-style-type: none"> <li>• Heating, ventilation, and air conditioning (HVAC) system upgrade:             <ul style="list-style-type: none"> <li>- Replacing old, inefficient boilers with high-efficiency condensing boilers, air source heat pumps (ASHPs), or connecting to efficient district heating networks.</li> <li>- Installation of energy recovery ventilators (ERVs) or heat recovery ventilators (HRVs) to recover heat from exhaust air while ensuring high-quality indoor air.</li> <li>- Hydraulic balancing of the heating system to ensure uniform heat distribution across all rooms.</li> </ul> </li> <li>• Lighting system retrofit- replacement of all conventional lighting with LED fixtures coupled with smart controls (e.g., occupancy sensors and daylight harvesting).</li> <li>• Building automation system (BAS) installation- implementing advanced controls to automatically manage and optimize heating, cooling, and lighting based on schedules, outdoor conditions, and occupancy levels (Demand-Controlled Ventilation - DCV).</li> <li>• Renewable energy integration - installation of on-site clean energy generation, typically Photovoltaic (PV) solar panels on the roof, to offset the building's remaining energy consumption.</li> <li>• Water heating system upgrade- replacing conventional hot water systems with high-efficiency alternatives, such as Solar Thermal or dedicated heat pump water heaters.</li> </ul>
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Based on the results of walk-through energy audits, different renovation strategies were developed for a typical public building.

(i) A “deep” renovation package, including replacement of windows and doors, insulation of external walls and the ceiling/roof, a switch from coal- and gas-fired boilers to wood pellet boilers, rehabilitation of the heat distribution network, and upgrading of indoor and outdoor lighting to LED technology, would require an investment of approximately EUR 100–140 per square meter and would generate energy savings of 50–60%, with a payback period of 8–10 years.

(ii) An “advanced” renovation package, which includes all measures of the “deep” package, replacement of the boiler with a heat pump, as well as installation of a rooftop photovoltaic system with battery storage and a solar thermal collector for domestic hot water preparation, where conditions allow, would require an investment of approximately EUR 160–190 per square meter and would generate energy savings of 65–70%, with a payback period of 10–14 years.

For approximately 40% of cases, the energy audits suggest switching from wood or gas heating to electrically driven heat pumps. In buildings currently heated by electricity, the application of a heat pump is recommended. For another approximately 40% of cases, improving the heat supply through connection to district heating systems is recommended. Additional heat supply options include modernization of wood-based heating systems by replacing them with pellet boilers. In around 30% of cases, the energy audits recommended installing rooftop photovoltaic systems, which would further reduce electricity consumption after the renovations. The conducted energy audits confirmed that a significant share of public buildings does not meet the sanitary requirements for indoor climate conditions (indoor temperature of 20°C) in accordance with current building standards.

**Moldova Energy Efficiency Revolving Mechanism (MEERM)  
Environmental and Social Management Framework**

Analysis of actual energy consumption indicates an average level of underheating and under-illumination of approximately 25% compared to the calculated energy consumption based on the existing building performance. The reasons are manifold and include: (i) insufficient institutional funding, leading to forced energy cost savings through reduced heating; (ii) very poor building conditions, making it technically impossible to achieve the norm indoor temperature; (iii) insufficient heat generation capacity; or (iv) limited availability or high cost of fuels for individual heating (wood or expensive pellets).

The overarching strategy aims to achieve indoor comfort conditions as set by regulations; therefore, the actual low energy consumption level was revised and replaced with a “normative demand reference level,” which serves as the basis for determining energy savings resulting from building renovation. The following example illustrates this approach: the actual energy consumption of an administrative building is 138 kWh/m<sup>2</sup>, corresponding to an average indoor temperature of 17°C during the heating season. Applying a renovation package with an energy-saving potential of 57% results in a post-renovation energy demand of 60 kWh/m<sup>2</sup>, while achieving the required indoor temperature of 20°C. The energy savings compared to the normative reference level amount to 78 kWh/m<sup>2</sup>.

**To be eligible, facilities must meet the following basic eligibility criteria:** (i) full ownership by a central governmental institution and primary used for public services (administration, or health or education, social, etc.) and the Public agency has full control over energy costs and payment for energy; (ii) preliminary confirmed structural soundness of the buildings (in terms of structural durability and safety of the construction); stability of the building, no seismic and construction damages; (iii) secured prospective use of the facility, and absence of plans for closure or downsizing or privatization; and (iv) the building has been constructed between 1950 and 2005, as it is expected that relatively new buildings have lower demand for retrofit. (v) detached, single-use buildings to achieve significant energy savings and enable cost reduction benefits, and (vi) no significant capital repairs or major renovation over the last five years, to avoid renewed EE intervention for buildings with already better energy performance.

#### **2.4 The Project's Beneficiaries**

The beneficiaries of the project include:

- (a) *Public authorities (buildings of specialized central public administration authorities administrators and staff)*. Energy efficiency improvements are expected to result in improvement of the working conditions and in energy cost savings, which will create a solid base for further benefit from energy-efficient rehabilitations in a financially sustainable manner by ensuring the savings generated by the EE upgrades support EE measures in new buildings. Additionally, public authorities will benefit from capacity building activities supported under this project.
- (b) *Public building users (various population categories, benefiting of public services)*. EE measures shall benefit all types of users to achieve indoor thermal comfort levels, improved lighting, and indoor ventilation/air quality.
- (c) *The users of Rehabilitation and temporary placement centers / GBV shelters* shall benefit from improved living conditions, regular access to hot water, improved thermal indoor comfort, and better lighting and indoor air quality.
- (d) *Private sector energy service suppliers (construction and design companies, energy auditors, Energy Service Companies, equipment suppliers, etc.)*. Various private sector market actors are expected to benefit from the project by building demand for their energy efficiency goods and services, and by enhancing their capacity to prepare, appraise, implement, finance and/or monitor energy efficiency projects through targeted training and technical assistance activities. Specific beneficiaries may include: energy auditors, design and construction companies, equipment suppliers, commercial banks and Energy Service Companies (ESCOs).
- (e) *National Regulatory and Financial Authorities (including the Ministry of Finance) in the field of energy* will benefit of project measures targeted towards the operationalization of an Energy Efficiency

***Moldova Energy Efficiency Revolving Mechanism (MEERM)***

***Environmental and Social Management Framework***

Revolving Fund (EERF), designed to reinvest realized energy savings into future projects with the purpose to ensure the continuous replenishment of financial resources for energy efficiency.

***2.5 The Project Location***

The geographical coverage of the project interventions includes only urban areas (towns): city of Chisinau, and might as well include other towns.

### **3 ENVIRONMENTAL & SOCIAL POLICIES, REGULATIONS AND LAWS**

This section includes an overview of national legislation and WB’s ESSs relevant for the implementation of the MEERM’s activities. It identifies the gaps between the WB’s ESSs and national legislation to be covered by the Project’s specific documents and proper additional actions.

#### **3.1 Legal Framework of Republic of Moldova**

Below are presented the relevant laws and Government Decisions of the Republic of Moldova in for MEERM’s components implementation.

**Table 4. National legal framework on the environment, constructions and energy**

<b>Law/ Regulation</b>	<b>Description and Relevance to Project Activities</b>
<b>Law on energy no. 174/2017</b>	This law establishes the legal framework for organizing, regulating, and ensuring the efficient and safe operation of the energy sectors. The project’s activities will be implemented in accordance with the requirements of this law.
<b>Law on electricity no.164/2025</b>	The purpose of this law is to establish a general regulatory framework for the organization, regulation, ensuring the efficient functioning, and monitoring of the electric power sector intended to supply consumers with electricity under conditions of accessibility, availability, reliability, continuity, quality, and transparency; to provide adequate investment incentives for electricity generation and the development of electricity networks, in particular to encourage long-term investments in a decarbonized and sustainable electric power system; as well as to contribute to the achievement of other state policy objectives in the field of energy.  The project’s activities will be implemented in accordance with the requirements of this law, specifically component 1.
<b>Law on thermal energy and the promotion of cogeneration no.92/2014</b>	This law regulates the activities specific to centralized thermal energy supply systems, aimed at improving the energy efficiency of the entire economy and reducing the negative impact of the thermal energy sector on the environment, including through the use of cogeneration
<b>Law on energy efficiency No. 139/2018,</b>	Law is hugely important as a horizontal piece of legislation that catalyzes promoting energy efficiency across all sectors, with a particular focus on buildings. This legislation establishes the fundamental principles of state policy on energy efficiency, many of which have a direct impact on the construction sector. The law includes various key elements, including the formulation and implementation of an energy efficiency strategy, a 3% annual renovation requirement for centrally owned and occupied buildings, the introduction of mandatory EE schemes, the integration of energy efficiency considerations into public procurement processes, and the facilitation of the promotion of energy services.
<b>Law on the energy performance of buildings No. 282/2023</b>	Recognizing that the building sector is a key contributor to energy consumption, the Republic of Moldova has prioritized the adoption of legislative measures to improve the energy performance of buildings. The purpose of this law is to create the necessary legal framework for promoting the improvement of the energy performance of buildings, taking into account climatic conditions, indoor climate requirements, and cost-effectiveness,

**Moldova Energy Efficiency Revolving Mechanism (MEERM)  
Environmental and Social Management Framework**

	<p>including through the implementation of public policy documents and measures aimed at improving the energy performance of buildings, by establishing minimum energy performance requirements and carrying out energy performance certification of buildings, as well as by ensuring that building owners/administrators/managers or potential buyers/tenants are informed about the level of energy performance of buildings.</p>
<p><b>Law No. 10/2016 on promoting the use of energy from renewable sources</b></p>	<p>Law No. 10/2016 sets binding national targets for increasing the share of energy from renewable sources. These targets provide a clear roadmap for the Republic of Moldova to transition to a more sustainable energy environment. By setting specific targets, the law establishes a framework for achieving significant penetration of renewable energy in the construction sector, thereby contributing to reduced greenhouse gas emissions and increased energy security. In the building sector, Law No. 10 encourages and promotes the use of renewable energy sources for heating, cooling, and electricity generation through net metering systems. Net metering enables building owners to generate renewable energy on-site and feed surplus electricity back into the grid, receiving credits or compensation for the energy they supply. By encouraging net metering, the law empowers building owners to become active participants in the transition to renewable energy, thereby promoting a decentralized and sustainable energy system. Additionally, the law designates the Energy Efficiency Agency as the primary body for implementing state policy on renewable energy sources. This designation ensures effective coordination, implementation, and monitoring of various renewable energy measures and initiatives in the building sector. In conclusion, the Law provides a solid legal framework to stimulate the adoption of renewable energy in the construction sector. Through its mandatory national targets, support schemes, guarantees of origin, administrative procedures, and the promotion of net metering, the law facilitates the integration of renewable energy technologies, contributing to improved energy performance and the development of nearly zero-energy buildings.</p>
<p><b>Government Decision No. 621/2024 Regulation on the procedure for certifying the energy performance of buildings and building units</b></p>	<p>The Regulation on the procedure for certifying the energy performance of buildings and building units establishes the specific requirements and procedure for certifying the energy performance of buildings and building units, including the method of drawing up energy performance certificates, specific requirements for maintaining the electronic register of energy performance certificates, the procedure for registering energy performance certificates, and specific requirements for informing potential buyers or tenants of the building or building unit.</p>
<p><b>NCM M.01.01.01:2025: Energy performance of buildings Minimum energy performance requirements for buildings;</b></p> <p><b>NCM M.01.02:2026: Energy performance of buildings Methodology for calculating the energy</b></p>	<p>Regulation on "Energy performance of buildings - Minimum requirements for the energy performance of buildings." It sets minimum energy performance requirements for buildings, covering aspects such as thermal insulation, heating and cooling systems, ventilation, and lighting efficiency. Compliance with these requirements ensures that new buildings and major renovations meet specific energy efficiency standards.</p> <p>The regulation on "Energy performance of buildings - Methodology for calculating the energy performance of buildings" provides a standardized methodology for calculating the energy performance of buildings. It takes into account factors such as building geometry, materials, thermal insulation,</p>

**Moldova Energy Efficiency Revolving Mechanism (MEERM)  
Environmental and Social Management Framework**

<p><b>performance of buildings;</b></p>	<p>heating, ventilation, and air conditioning systems, as well as the integration of renewable energy sources. This methodology enables energy auditors to accurately assess and compare the energy performance of different buildings.</p>
<p><b>Government Decision nr 102/2013 on approval of Energy Strategy of the Republic of Moldova until 2030</b></p>	<p>The Energy Strategy of the Republic of Moldova until 2030 provides a vision for the development of Moldova's energy system, defining national objectives for the period 2013-2030 and setting specific strategic objectives for each stage. The strategy also outlines the measures needed to achieve these objectives. The energy strategy focuses on three main goals for Moldova. First, ensuring a stable energy supply for the country is a priority. This includes diversifying energy sources and strengthening energy security. Second, the strategy aims to facilitate the creation of competitive markets and promote regional and European energy integration. This involves improving energy infrastructure and encouraging cooperation with neighboring countries. Ultimately, the strategy prioritizes fostering environmental sustainability and mitigating the effects of climate change by reducing greenhouse gas emissions and enhancing energy efficiency. The energy strategy emphasizes adopting energy-efficient technologies and implementing thermal insulation measures for building envelopes. These measures are considered crucial steps toward reducing energy consumption in the building sector while improving occupants' comfort and well-being. By enhancing the energy efficiency of buildings, the strategy seeks to achieve substantial energy savings and contribute to meeting overall energy performance targets.</p>
<p><b>Law on public finances and budgetary and fiscal responsibility No. 181/2014</b></p>	<p>This law establishes the general legal framework in the field of public finances, in particular: a) it establishes the principles and rules of budgetary and fiscal policy; b) determines the components of the national public budget and regulates inter-budgetary relations; c) regulates the budgetary calendar and general procedures for the budgetary process; d) delimits competences and responsibilities in the field of public finance.</p>
<p><b>Law on the environmental protection No.1515/1993</b></p>	<p>Provides basic rules regarding environmental quality conditions, rights, and duties of each actor with activities with potential impact on the environment.</p>
<p><b>Law on Environmental Impact Assessment No.86/ 2014</b></p>	<p>Establishes the goal of preparing documentation on the Environmental Impact Assessment (EIA), its procedure, coordination, and approval, and includes the List of objects and types of activities for which an EIA is compulsory prior to their design.</p> <p>According with Law 86/2014, such activities as: thermal insulating of wall and roof, replacing windows and doors, renovation of internal heating system and changing the individual heat point, and replacement of lighting, using well proven technologies and equipment for energy efficiency improvements in end-use application are nor subject of Annex 1 or 2 of the EIA.</p>
<p><b>Law on green spaces of the urban and rural localities No.591/ 1999</b></p>	<p>Regulates the identification and delineation of the green areas within the settlement' areas.</p>
<p><b>Law on the Protection of Monuments No. 1530/1993</b></p>	<p>The purpose of the law is to ensure the protection of immovable cultural heritage—i.e., buildings, sites, historical structures—of historical, architectural, and cultural value, in order to preserve them for future generations. By clearly defining what a monument is and establishing protection rules, the law aims to:</p> <ul style="list-style-type: none"> <li>• prevent the destruction, degradation, or alteration of monuments;</li> </ul>

**Moldova Energy Efficiency Revolving Mechanism (MEERM)  
Environmental and Social Management Framework**

	<ul style="list-style-type: none"> <li>regulate how they can be used, rehabilitated, or restored — or impose restrictions to preserve their cultural value;</li> <li>to provide a legal framework for identifying and recording immovable heritage.</li> </ul>
<b>Law on public sanitation services No. 178/2025</b>	This law establishes a unified legal and institutional framework for the establishment, organization, management, financing, monitoring, and control of public sanitation services in localities, including the administration and operation of infrastructure related to this service.
<b>Criminal Code No.98 /2022</b>	It is applicable to the project to be applicable for sexual harassment. The relevant provisions are included in the work contract signed between PIU and contractor.
<b>Labor Code of the Republic of Moldova No. 154/2003</b>	<p>Scope of the Code</p> <p>(a) to employees who are citizens of the Republic of Moldova, employed on the basis of an individual employment contract, including those with a contract for continuing vocational training or professional qualification, who perform work in the Republic of Moldova;</p> <p>b) to employees who are foreign citizens or stateless persons employed on the basis of an individual employment contract, who are working for an employer operating in the Republic of Moldova;</p> <p>c) employees who are citizens of the Republic of Moldova working at diplomatic missions of the Republic of Moldova abroad;</p> <p>d) to employers who are natural or legal persons in the public, private or mixed sectors who use salaried labor;</p> <p>e) employees of public, religious, trade union, employers' associations, foundations, parties and other non-commercial organizations that use salaried work.</p>
<b>Law on Safety and Health at Work No. 186/2008</b>	<p>This Act regulates the legal relations concerning the establishment of measures for ensuring the safety and health of workers at work. Ensuring the occupational safety and health of workers is a managerial duty.</p> <p>This Act lays down the general principles concerning the prevention of occupational risks, the protection of workers at work, the elimination of risk and accident factors, information, consultation, balanced participation, training of workers and their representatives, as well as general guidelines for the application of the above principles.</p>
<b>Law on State Public Health Surveillance No. 10/2009)</b>	<p>This Law regulates the organization of state public health supervision, establishing general public health requirements, the rights and obligations of natural and legal persons and the manner of organization of the system of state public health supervision.</p> <p>The purpose of this Law is to ensure optimal conditions for the maximum realization of the health potential of each individual throughout life through the organized effort of society to prevent disease, protect and promote the health of the population and improve the quality of life</p>
<b>Law on fire protection No. 267/1994</b>	The Law regulate the fire protection system, the set of specific legal, organizational, economic, social, technical-scientific and public information activities, planned, organized and implemented for the purpose of preventing and reducing the risks of fire, as well as ensuring an operative intervention

**Moldova Energy Efficiency Revolving Mechanism (MEERM)  
Environmental and Social Management Framework**

	<p>for evacuation and rescue of persons, extinguishing fires, protecting property and the environment against their effects, and includes:</p> <ul style="list-style-type: none"> <li>(a) rules and standards in the field of fire defense.</li> <li>b) State supervision in the field of fire protection insurance.</li> <li>c) ensuring fire-fighting, fire intervention, and rescue actions</li> <li>(d) certification of products and goods in the field of fire protection.</li> <li>(e) technical approvals for new products, processes, and equipment in the field of fire protection.</li> <li>(f) fire risk assessment for objectives at the design, construction, operation, and after-use stages</li> <li>g) certification of specialists carrying out fire protection activities.</li> <li>h) participating in the final acceptance of constructions and related installations financed by the state or local budgets.</li> <li>i) issuing permits for certain types of activity.</li> <li>j) training natural and legal people in the field of fire protection.</li> <li>k) informing the population about fire protection.</li> </ul>
<p><b>Government Decision for the approval of normative acts regarding the implementation of the Law on Occupational Safety and Health No. 186-/ 2008 No. 95 of 05.02.2009</b></p>	<p>This Regulation establishes the minimum requirements for protecting workers at work and preventing occupational risks.</p>
<p><b>Government Decision on the approval of the minimum requirements for safety and health at work no. 353 of 05.05.2010</b></p>	<p>The Regulation stipulates the minimum requirements for health and safety at work</p>
<p><b>Government Decision No. 80/ 2012, concerning the minimum safety and health requirements for temporary or mobile construction sites;</b></p>	<p>This regulation establishes the functional conditions of temporary or mobile construction sites, the rules of security and monitoring, and the conditions of occupational safety for construction sites involved in <i>civil work</i>.</p>
<p><b>Government Decision No. 918 of November 18, 2013 on the minimum requirements for safety and health markings at the workplace;</b></p>	<p>The regulation established the General minimum requirements for safety and health signs at work; general minimum requirements for signs; minimum requirements for signs on containers or pipelines; minimum requirements for the identification and location of firefighting and fire-prevention equipment; minimum requirements for the marking of obstacles and dangerous places and for the marking of traffic routes; minimum requirements for light signals; minimum requirements for audible signals; minimum requirements for verbal communication and nonverbal signals.</p>
<p><b>Government Decision No. 603 of August 11, 2011, on the minimum safety and health requirements for the use of equipment by</b></p>	<p>The regulation establishes the minimum safety and health requirements for work equipment and additional minimum safety and health requirements for the use of work equipment by workers during civil work activities.</p>

**Moldova Energy Efficiency Revolving Mechanism (MEERM)  
Environmental and Social Management Framework**

<p><b>employees at the workplace;</b></p>	
<p><b>Government Decision No. 244 of April 8, 2013 approving the minimum requirements for the protection of workers from the risks related to exposure to asbestos at the workplace;</b></p>	<p>The regulation establishes the minimum requirements for the protection of workers from the risks related to exposure to asbestos at work apply to activities in which workers are exposed or are likely to be exposed to dust arising from asbestos or asbestos-containing materials and aim to protect workers from risks to their health arising or likely to arise from exposure to asbestos at work, including the prevention of such risks. According to the regulations, the term asbestos means the following fibrous silicates: asbestos actinolite CAS (Chemical Abstract Service Registry) No. 77536-66-4; amosite asbestos CAS No. 12172-73-5; asbestos anthophyllite CAS No 77536-67-5; chrysotile CAS No.12001-29-5; crocidolite CAS No 12001-28-4; asbestos tremolite CAS No 77536-68-6.</p>
<p><b>Government Decision No. 362 of May 27, 2014 approving the minimum requirements on the workers' protection against risks to their health and safety arising or that may arise from exposure to noise, in particular from the risks to hearing;</b></p>	<p>The regulation establishes the minimum requirements for protecting workers from risks to their health and safety arising from or likely to arise from noise exposure.</p>
<p><b>Government Decision No. 324 of May 30, 2013, on approval of the sanitary Regulations for health and safety requirements on the workers' protection from the risks related to chemical agents at the workplace;</b></p>	<p>The Health and Safety Requirements for the Protection of Workers from the Risks Related to Chemical Agents at Work lay down the requirements for the protection of workers from risks to their health and safety arising or likely to arise from the effects of chemical agents present at work or as a result of any occupational activity involving chemical agents. Where carcinogens and mutagens are present in the workplace, the provisions of this Regulation shall apply subject to the health and safety requirements for the protection of workers from the risks related to exposure to carcinogens or mutagens at work.</p>
<p><b>Law on Waste No. 209/2016</b></p>	<p>This law establishes the legal bases, state policy and necessary measures for the protection of the environment and public health by preventing or reducing the adverse effects caused by the generation and management of waste and by reducing the overall effects of resource use and increasing the efficiency of their use. This law incorporates the relevant regulations for the field of waste management and establishes:</p> <ul style="list-style-type: none"> <li>a) the rules for the prevention of waste generation and its management;</li> <li>b) the rights and obligations of persons involved in waste management;</li> <li>c) the powers of public administration bodies in waste management</li> </ul> <p>The Law regulates the management of the specific waste streams, including the hazardous ones.</p>

**Moldova Energy Efficiency Revolving Mechanism (MEERM)  
Environmental and Social Management Framework**

<p><b>Government Decision No. 144/2024 for the approval of the Regulation on the ecological management of mercury waste</b></p>	<p>The Regulation establishes requirements for the environmentally sound management of mercury waste in order to ensure traceability throughout the entire mercury waste management chain and a high level of protection of human health and the environment.</p> <p>The Regulation provides for appropriate measures and conditions for the collection, packaging, labelling, transport, temporary storage and treatment of mercury waste. Producers of mercury waste ensure their ecological management in a manner that is safe for the environment and health, in accordance with the provisions of Law No. 209/2016 on waste, the Minamata Convention and the Basel Convention on the control of transboundary movements of hazardous wastes and their disposal, to which the Republic of Moldova acceded by Parliament Decision No. 1599/1998, as well as with this Regulation.</p>
<p><b>Law on climate action No. 74 /2024</b></p>	<p>The law establishes the regulatory framework for climate action aimed at achieving climate neutrality by 2050, with a view to meeting the long-term global temperature goal set out in the Paris Agreement, ratified by Law No. 78/2017, as well as the regulatory framework for making progress towards the global goal of adapting to climate change. The purpose of this law is to ensure the gradual and irreversible reduction of greenhouse gas emissions in order to protect human health, ecosystem integrity, and biodiversity from the threats posed by climate change, to strengthen adaptive capacity, to reduce society's vulnerability to climate change and to increase climate resilience, by applying the financial mechanism for setting the price of carbon dioxide emissions (hereinafter also referred to as CO2 emissions) and the "polluter pays" principle.</p>
<p><b>Law No. 43/2023 on fluorinated greenhouse gases</b></p>	<p>This law establishes the legal framework for the implementation of measures to mitigate climate change and protect the environment by reducing emissions of fluorinated greenhouse gases.</p> <p>The purpose of this law is to regulate precautionary measures at national level regarding:</p> <ul style="list-style-type: none"> <li>a) the containment, use, recovery and disposal of fluorinated greenhouse gases, as well as related ancillary measures;</li> <li>b) the placing on the market of specific products and equipment containing or whose functioning relies on fluorinated greenhouse gases, with the exception of refrigeration and/or air conditioning equipment, which, at the time of import, does not contain such gases;</li> <li>c) the specific use of fluorinated greenhouse gases;</li> <li>d) the application of quantitative limits for the placing on the market of hydrofluorocarbons.</li> </ul>
<p><b>Law nr. 852/2002 for the approval of the Regulation on the commercial regime and regulation of the use of halogenated hydrocarbons that destroy the ozone layer</b></p>	<p>The provisions of this Regulation apply to the production, import, export, re-export, transit, placing on the market, trade, use, recovery, recycling and regeneration of substances that deplete the ozone layer, in a pure state or in mixtures with a concentration exceeding 1% by mass, whether in bulk or in transport containers, to new substances, as well as to equipment, products indicated in Annex No. 2 to this Regulation, containing the substances specified in Annex No. 1 to this Regulation.</p>
<p><b>Law on quality in construction no.721/1996</b></p>	<p>The provisions of this law are applied to construction and related facilities, hereinafter referred to as the building industry, in the design, construction and building, as well as in the stages of exploitation and interventions to existing structures and post-utilization them, regardless of their form of ownership, destination, category and class or source of funding, to protect people's lives</p>

**Moldova Energy Efficiency Revolving Mechanism (MEERM)  
Environmental and Social Management Framework**

	their goods, society and the environment. The law provisions are relevant to project activities and should be reflected in the documents for all proposed civil work.
<b>Urban Planning and Construction Code No. 434 /2023 (UPCC)</b>	The Urban Planning and Construction Code (hereinafter referred to as the Code) establishes a unified regulatory framework for land use planning, urban planning, the authorization and execution of design and construction works, post-use of buildings, quality assurance of buildings, building materials and products, exercise of state control over compliance with land use and urban planning regulations and the building permit regime, as well as the uniform application of the provisions of the legislation in the field of construction quality in the Republic of Moldova, in the public interest. The provisions of the Code are relevant, and its requirements apply to all civil works.

**Table 5. Relevant Social, Anti-Discrimination and Transparency in Decision-Making Legal Framework**

<b>Law/ Regulation</b>	<b>Description and Relevance to Project Activities</b>
<b>Law regarding the promotion of employment and unemployment insurance no. 105 from 14 June 2018<sup>1</sup></b>	The purpose of this law is to prevent and reduce unemployment and its social effects, reduce the risk of unemployment, ensure a high level of employment, and adapt to the demands of the labor market.
<b>Law on ensuring equal opportunities between women and men no. 5-XVI of 09 February 2006<sup>2</sup></b>	The purpose of law is to ensure the exercise of equal rights by women and men in the political, economic, social, cultural, and other spheres of life, rights guaranteed by the Constitution of the Republic of Moldova, and to prevent and eliminate all forms of discrimination based on gender criteria.
<b>Law on Social Inclusion of Persons with Disabilities, no. 60 of 30 March 2012<sup>3</sup></b>	The law ensures the rights of persons with disabilities for their social inclusion, guaranteeing the possibility of their participation in all areas of life without discrimination, on an equal basis with other members of society, with respect for fundamental human rights and freedoms as its basis.
<b>Law on access to information of public interest No. 148 of June 9, 2023;<sup>4</sup></b>	The law aims to ensure the transparency of public sector activities. It regulates: a) the manner of exercising and defending the right of access to information of public interest; b) the obligations of information providers in ensuring access to information of public interest; c) legal liability for violating the provisions regarding access to information of public interest; d) the mechanism for monitoring and controlling the implementation of the law.
<b>Law on open data and the reuse of public sector information Nr. 109 of May 22, 2025<sup>5</sup></b>	This law aims to establish uniform minimum rules for the commercial and non-commercial reuse of public sector information. This law regulates the legal framework for the reuse of information held by public sector bodies and public undertakings, generated in the course of their activities, including for the purpose of developing new information products and services, as well as

<sup>1</sup> [https://www.legis.md/cautare/getResults?doc\\_id=105474&lang=ro](https://www.legis.md/cautare/getResults?doc_id=105474&lang=ro)

<sup>2</sup> [https://www.legis.md/cautare/getResults?doc\\_id=26886&lang=ro#](https://www.legis.md/cautare/getResults?doc_id=26886&lang=ro#)

<sup>3</sup> [https://www.legis.md/cautare/getResults?doc\\_id=83915&lang=ro](https://www.legis.md/cautare/getResults?doc_id=83915&lang=ro)

<sup>4</sup> [https://www.legis.md/cautare/getResults?doc\\_id=137908&lang=ro](https://www.legis.md/cautare/getResults?doc_id=137908&lang=ro)

<sup>5</sup> [https://www.legis.md/cautare/getResults?doc\\_id=148946&lang=ro](https://www.legis.md/cautare/getResults?doc_id=148946&lang=ro)

**Moldova Energy Efficiency Revolving Mechanism (MEERM)  
Environmental and Social Management Framework**

	the practical arrangements for facilitating the reuse of: 1) existing information held by public sector bodies; 2) existing information held by public undertakings which: a) carry out one of the activities referred to in art. 9–15 of Law no. 74/2020 on procurement in the energy, water, transport and postal services sectors; b) carry out their activity as public service operators pursuant to art. 78 of the Railway Transport Code no. 19/2022; c) carry out their activity as air carriers fulfilling public service obligations in accordance with the Air Code; 3) information resulting from research activity, in accordance with the conditions provided for art.12.
<b>Law on Transparency in Decision Making No. 239 of November 13, 2008;</b> <sup>6</sup>	The law establishes the applicable norms for ensuring transparency in the decision-making process within central and local public administration authorities, as well as other public authorities. It regulates their relations with citizens, associations established in accordance with the law, and other interested parties, facilitating participation in the decision-making process.

### 3.2 National Environmental and Social Assessment and Permitting Procedure

#### 3.2.1 General institutional structure relevant to the project

*The key institutions, dealing with the environmental and permitting acts in the Republic of Moldova that are relevant for the current project proposal, are as follows:*

**Environmental Agency** (GD no. 549 of 13.06.2018) is an administrative authority subordinated to the MoE, responsible for the implementation of state policy in various environmental areas of activity. For the present project, the relevant functions of the Environmental Agency are as follows:

- to review and approve the EIA
- to monitor implementation of the conditions and requirements from the Environmental Permit (*Acord de Mediu*) issued based on the EIA procedure.
- To issue permits

**Environmental Protection Inspectorate** (GD No. 548 of 13.06.2018) - is organized and functions as an administrative authority under the MoE empowered to carry out state supervision and control in the field of environmental protection and use of natural resources.

**The National Center for Sustainable Energy (CNED)** (GD No. 1060 of 21.12.2023) operates as a Public Institution. Areas of activity: - energy efficiency; - utilization of renewable energy sources; - financial assistance for the implementation of projects/programs. The Center plays a crucial role in implementing the state's energy policy, acting in accordance with specific legislation to promote energy efficiency and the use of renewable energy sources.

In accordance with the legislation assessed in Tables 4–5, the measures planned under the current project proposal do not require the implementation unit to request any specific assessments or permits.

#### 3.2.2. Categories of permits relevant to the project

**a. The Environmental Impact Assessment (EIA)** in the Republic of Moldova is governed by the Law no. 86/2014 regarding Environmental Impact Assessment<sup>7</sup> and establishes the mechanism for assessing the impact on the environment of certain types of public and private planned activity and the mechanism for assessing biodiversity to ensure the prevention or minimization, at the initial stages, of the significant impact on the

<sup>6</sup> [https://www.legis.md/cautare/getResults?doc\\_id=142655&lang=ro#](https://www.legis.md/cautare/getResults?doc_id=142655&lang=ro#)

<sup>7</sup> The law transposes Directive 2011/92/EU: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32011L0092>

***Moldova Energy Efficiency Revolving Mechanism (MEERM)  
Environmental and Social Management Framework***

environment and the health of the population, as well as for the implementation of the obligations assumed by the Republic of Moldova on the international level.

The Environmental Agency is responsible for E(S)IA process by (i) ensuring the implementation of EIA procedures at the national and trans-boundary level, (ii) identifies stakeholders, as well as the interested public, in order to ensure their participation in the decision-making procedures, (iii) inform the stakeholders, as well as ensure the participation and presentation of the relevant information to them, (iv) examines the information provided by stakeholders and the EIA Report, (v) issues the decision regarding the environmental agreement and, if necessary, issues the Environmental Permit, as well as informs stakeholders about places of the official web page where the Environmental Permit shall be published.

The Environmental Decision or the Permit issued by the Environmental Agency shall be applicable and cascaded to the project's life cycle by taking into consideration ES requirements at the design, construction and operational phases.

The Preliminary Assessment Report (PAR) is developed by the initiator based on feasibility and energy audit data specific for the planned activity of the Project by using ES questionnaire and PAR is submitted to the Environmental Agency for examination and issuance of decision. The Environmental Agency can issue the reasoned decision regarding the preliminary assessment, such as: (i) the need to develop the full Environmental and Social Impact Assessment (ESIA) & environmental and Social Management Plan (ESMP) for the planned activities in conformity with the Annex 1 of the law no. 86/2014, (ii) the need to develop the ESIA & ESMP for planned activity according to the Annex 2 of the Law no. 86/2014 and (iii) no need for any ESIA&ESMP.

Following the examination of the PAR, the Environmental Agency informs the initiator, the interested central and local public administration authorities, including the local public authorities within whose scope the planned activity is expected to be implemented, about the issuance of the decision regarding the prior assessment and places its content on its official web page.

The local public administration authority within whose scope the planned activity is expected to be implemented shall place the content of the decision regarding the prior assessment on its official web page and at its headquarters.

The initiator, under the guidance of the Environmental Agency, informs the interested public about the decision regarding the prior assessment, including by publishing an announcement in a local or, as the case may be, national newspaper.

***b. National Permitting system specific for Projects with significant impacts***

The Republic of Moldova design procedure represents the essential stage for developing technical documents based on the specific requirements stated in the technical specification and developing the environmental and social documents by taking into consideration the screening criterion received at the pre-construction stage, specific to technical, environmental, and social aspects issued by the central and local public authorities.

The planned activity with significant and high impacts shall be performed in accordance with the Environmental Permit issued by the Environmental Agency and in compliance with Urban Planning Certificates for Design issued by the Local Public Authority at levels I & II.

In order to ensure the quality criteria for the designed facility, in the design documentation shall be included, the following essential requirements: **A** - strength and stability; **B** - operational safety; **C** - fire safety; **D** - hygiene, human health, restoration and protection of the environment; **E** - thermal insulation, water repellent and energy saving and **F** - protection against noise and **G** – sustainable use of natural resources. The designer shall develop at the design stage the construction's environmental and social management plans (including OHS aspects) by taking into consideration technical data received during the design process and screening criterion data based on notices issued by the State Supervision Agencies (Environmental Agency, National Agency for Public Health, National Inspectorate for Technical Supervision, etc.) at the pre-construction stage.

**Moldova Energy Efficiency Revolving Mechanism (MEERM)  
Environmental and Social Management Framework**

Development of the technical design documentation is performed based on the Urban Planning Certificates for Design (UPCD) issued by the Local Public Authority (LPA) of levels I and II, and the design's technical concept is approved with initial data and technical survey results, taking into account the solutions adopted in urban planning documentation.

The Building / Construction Authorization is issued by the Local Public Authority (mayor) of the community by submitting the following technical documents:

- a) an extract from the project documentation, including the explanatory memorandum, the general plan (site plan, layout plan), facades, color schemes, and the construction work organization plan. For the authorization of construction works on technical and urban infrastructure, the facades and color schemes are not presented in the extract from the project documentation;
- b) the agreement of the co-owners of the immovable property, certified by a notary; in the case of the construction of roads, municipal (engineering) networks, including electronic communications, and infrastructure elements associated with these networks - the agreement of the owner or administrator of the immovable property to be used for the construction works;
- c) the written consent of the owner. The administration and residents of free economic zones who have registered the right of superficies in the Register of Real Estate are exempt from the obligation to hold and present the written consent of the owner – for the development of production infrastructure (construction of industrial halls) and technical and urban infrastructure in free economic zones, necessary for carrying out the activities provided for by Law No. 440/2001 on free economic zones;
- d) positive report on the verification of the project documentation;
- e) opinion of the central specialized body responsible for heritage.

According to the **Urban Planning and Construction Code** these permits are issued by the local public authorities. The permits in the field of construction are available digitally through the Automated Information System for the Management and Issuance of Permits (SIA GEAP).

***c. National Permitting system specific for Projects with Low and Moderate impacts***

The Projects with low impacts on environment and social, can be executed without an UPCD and without a Building / construction Authorization. According to art. 150 of Urban Planning and Construction Code nr. 434/2023, the category of these works includes among others::

- repairs for fences, roofs, coverings, or terraces, if their shape is not changed.
- replacements and repairs of the floors, interior, and exterior carpentry parts, if the shape and dimensions of the gaps are preserved.
- interior finishing works;
- exterior finishing works, if the facade elements and color solutions are not changed;
- replacements or repairs of stoves, installations, systems, equipment, and sanitary equipment inside the buildings.
- replacements or repairs to external connections, related to constructions, within the limits of the property;
- current repairs of roads, transport accesses, parking lots, sidewalks and stairs, of rainwater collection and drainage systems;
- routine maintenance works of public roads, periodic maintenance works of public roads, repairs of the infrastructure of land communication routes, with the maintenance of the routes, functions, surfaces, volumetric and technical category of the road;
- installation of urban furniture;
- landscaping related to the existing construction;
- auxiliary constructions, annexes with a constructed area of up to 15 m<sup>2</sup> to private houses, located on private lands;

***Moldova Energy Efficiency Revolving Mechanism (MEERM)  
Environmental and Social Management Framework***

- installation of engineering and electronic communications networks and the infrastructure elements associated with these networks (temporary installations, made up of easily removable elements) on or inside buildings, constructions and existing installations, including the existing underground channeling for cables, except in cases in whose installation involves interventions in the resistance structure, new underground laying and the installation or construction of support structures with foundations permanently attached to the ground (pillars, beams, brackets)
- installation of engineering and electronic communications networks (internal access networks) in the infrastructure (systematized wired routes and technological spaces) for the installation of equipment and other infrastructure elements of internal access networks in buildings;
- maintenance, repair, replacement and retrofitting of engineering and electronic communications networks and infrastructure elements associated with these networks;
- connecting subscribers to engineering and electronic communications networks (internal access networks), etc

In the case of interventions on the monuments of history, art and architecture that are registered in the Register of monuments of the Republic of Moldova protected by the state, the categories of works described above will be executed based on Urban Planning Certificates for Design and Building/ construction Authorization, and the categories of works will be executed based on the prior positive opinion of the Ministry of Culture.

**3.3 World Bank Standards applicable for the Project’s activity**

**3.3.1 The World Bank’s Standards**

The ESF sets out the World Bank’s commitment to sustainable development through a Bank Policy and a set of Environmental and Social Standards designed to support Borrowers’ projects, with the aim of ending extreme poverty and promoting shared prosperity. The summary of several relevant ESSs is presented below.

The Environmental and Social Standards outline the requirements for Borrowers regarding the identification and assessment of environmental and social risks and impacts associated with projects supported by the Bank through Investment Project Financing. The Bank believes that the application of these standards, by focusing on the identification and management of environmental and social risks, will support Borrower in their goal to reduce poverty and increase prosperity in a sustainable manner for the benefit of the environment and their citizens.

The standards will:

- (a) support Borrower in achieving good international practice relating to ES sustainability;
- (b) assist Borrower in fulfilling their national and international ES obligations;
- (c) enhance nondiscrimination, transparency, participation, accountability and governance;
- (d) enhance the sustainable development outcomes of projects through ongoing stakeholder engagement

The Borrower will assess, manage, and monitor the ES risks and impacts of the project throughout the project life cycle by applying Environmental and Social Standards<sup>8</sup> (ESSs), as well as the World Bank Group EHS Guidelines<sup>9,10</sup> to meet ESSs requirements in a manner and within a timeframe acceptable to the Bank to achieve environmental and social outcomes by:

- (a) Conducting an ESA of the proposed project, including stakeholder engagement;
- (b) Undertaking stakeholder engagement and disclosing appropriate information (ESS no.10);
- (c) Developing an ESCP, and implementing all measures and actions set out in the legal agreement, including the ESCP; and
- (d) Conducting monitoring and reporting on the ES performance of the project against the ESSs.

The World Bank’s environmental and social standards applicable to project activities are summarized below.

**Table 6. Relevant World Bank ESSs applicable to the planned activities under the Project**

<b>E&amp;S Standards</b>	<b>Requirements</b>	<b>Applicability to the Project and establish measures and actions</b>
<b><i>I. Assessment &amp; Management of Environmental and Social Risks and Impacts</i></b> <sup>7</sup>	The Standard sets measures and Responsibilities for assessing, managing, and monitoring ES risks and impacts associated with the Project’s life cycle, in order to achieve environmental and social outcomes consistent with ESSs.	<b>The Standard is applicable for the entire life cycle of the Project</b> This ESMF is developed in accordance with the ESS1. The ES screening and preparation of the site-specific ES instruments, i.e. Environmental and Social Management. A plan checklist and/or site-specific Environmental and Social Management Plans (ESMPs) will be created during the design stage of the

<sup>8</sup> Source: <https://projects.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/envirocanmental-and-social-standards>

<sup>9</sup> Source: <https://documents1.worldbank.org/curated/en/157871484635724258/pdf/112110-WP-Final-General-EHS-Guidelines.pdf>

<sup>10</sup> <https://thedocs.worldbank.org/en/doc/837721522762050108-0290022018/original/ESFFramework.pdf#page=29&zoom=80>

**Moldova Energy Efficiency Revolving Mechanism (MEERM)  
Environmental and Social Management Framework**

		subprojects. Measures & actions with timeframes for completion of such measures and actions is included in the ESCP.
<b>2. Labor &amp; Working Conditions<sup>11</sup></b>	The Standard sets out measures and responsibilities designed to protect direct & indirect workforce particular to the Project's life cycle, including labor-related risks (i) security risks to project workers, (ii) traffic and road safety issues, (iii) inadequate terms & conditions of employment, & (iv) OHS risks.	<b>The Standard is applicable for the entire life cycle of the Project.</b> The LMPs shall be developed for the Project as part of this ESMF, in accordance with ESS No. 2 and National Laws. Additionally, the responsibility for implementing the LMPs during project implementation is included in the agreed-upon Project ESCP.
<b>3. Resource Efficiency, Pollution Prevention &amp; Management<sup>12</sup></b>	The Standard sets out measures and responsibilities to address resource efficiency and pollution prevention and management throughout the project life cycle, including (i) resource consumption, (ii) pollution prevention, and (iii) actions to manage environmentally significant aspects, etc.	<b>The Standard is applicable for the entire life cycle of the Project</b> This ESMF will identify potential risks and impacts and will propose the appropriate mitigation measures. The site-specific risks and impacts will be identified at the design stage during the Environmental and Social screening process, and the mitigation measures will be applied according to the prepared site-specific Environmental and Social Management Plans (ESMPs) at every subproject level under components 1 and 2 of the Project.
<b>5. Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</b>	The involuntary resettlement should be avoided. Where involuntary resettlement is unavoidable, it will be minimized, and appropriate measures to mitigate adverse impacts on displaced persons (and on host communities receiving displaced persons) will be carefully planned and implemented.	<b>This standard is applicable.</b> The ESMF will include procedures to identify impacts on private businesses within public buildings that may result in potential income loss. The ESMF includes measures to be taken to assist such businesses and their employees at least restore their income through livelihood restoration plans.

<sup>11</sup> Source: <https://thedocs.worldbank.org/en/doc/837721522762050108-0290022018/original/ESFFramework.pdf#page=45&zoom=80>

<sup>12</sup> Source: <https://thedocs.worldbank.org/en/doc/837721522762050108-0290022018/original/ESFFramework.pdf#page=53&zoom=80>

**Sustainable Transition to the Energy Efficiency in Moldova**  
**Environmental and Social Management Framework**

<p><b>4. Community Health &amp; Safety</b><sup>13</sup></p>	<p>The Standard sets out measures and responsibilities for addressing health and safety risks to the community, including security of project activities, equipment, and infrastructure, as well as risks and impacts on project-affected communities.</p>	<p><b>The Standard is applicable for the entire life cycle of the Project</b>  This ESMF will identify potential risks and impacts and will propose the appropriate mitigation measures. The site-specific risks and impacts will be identified at the design stage during the Environmental &amp; Social screening process, and the mitigation measures will be applied according to the prepared site-specific Environmental and Social Management Plans (ESMPs) at every subproject level under components 1.</p>
<p><b>6. Biodiversity Conservation and Sustainable Management of Living Natural Resources</b></p>	<p>Based on the environmental and social assessment, the requirements of this ESS are applied to all projects that potentially affect biodiversity or habitats, either positively or negatively, directly or indirectly, or that depend upon biodiversity for their success.  This ESS also applies to projects that involve primary production and/or harvesting of living natural resources..</p>	<p><b>Not applicable for this Project</b></p>
<p><b>7. Indigenous Peoples/SubSaharan African Historically Underserved Traditional Local Communities</b></p>	<p>This ESS applies to a distinct social and cultural group identified in accordance with paragraphs 8 and 9 of this ESS. In some countries, such groups are referred to as ‘Indigenous Peoples’.</p>	<p><b>Not applicable for the Republic of Moldova</b></p>
<p><b>8. Cultural Heritage</b></p>	<p>The term ‘cultural heritage’ encompasses tangible and intangible heritage, which may be recognized and valued at a local, regional, national or global level, as follows:</p> <ul style="list-style-type: none"> <li>• Tangible cultural heritage, which includes movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Tangible cultural heritage may be located in urban or rural settings, and may be above or below land or under the water.</li> <li>• Intangible cultural heritage, which includes practices, representations, expressions, knowledge, skills—as well as the instruments, objects, artifacts and cultural spaces associated therewith—that communities and groups recognize of their</li> </ul>	<p><b>While the project is not expected to work in protected buildings, this standard is relevant as a precautionary measure in case any subproject / building subproject/building can have any protected status or cultural heritage value, per the definition of ESS8.</b> The site-specific risks and impacts will be identified at the design stage during the Environmental and Social screening process and the mitigation measures will be applied according to the prepared site-specific Environmental and Social Management Plans (ESMPs) at every subproject under component 1</p>

<sup>13</sup> <https://thedocs.worldbank.org/en/doc/837721522762050108-0290022018/original/ESFFramework.pdf#page=59&zoom=80>

**Moldova Energy Efficiency Revolving Mechanism (MEERM)  
Environmental and Social Management Framework**

	cultural heritage, as transmitted from generation to generation and constantly recreated by them in response to their environment, their interaction with nature and their history.	
<b>9. Financial Intermediaries</b>	This ESS applies to Financial Intermediaries (FIs) that receive financial support from the Bank. FIs include public and private financial services providers, including national and regional development banks, which channel financial resources to a range of economic activities across industry sectors. Financial intermediation also includes provision of financing or guarantees by FIs to other FIs.	<b>This Standard is applicable only to Component 2 of the project related to the technical assistance for the establishment of the EE revolving fund.</b> Technical assistance provided under the project for the establishment of the EE revolving fund will be consistent with the principles under ESS9.
<b>10. Stakeholder Engagement and Information Disclosure<sup>14</sup></b>	The Standard ensures an engagement with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design.	<b>The Standard is applicable for the entire life cycle of the Project</b> A SEP was prepared for the Project and is part of the ESF package to be implemented throughout the Project's life cycle. The responsibility to develop and implement a SEP is included in the ESCP.

Once the Project's applicability of WB's ESSs is established, the evaluation of compliance with the World Bank's ESSs and the Republic of Moldova legislation shall be performed.

**3.4 Gaps analysis between WB's Standards and National Framework**

The scope of the GAP analysis is to establish measures and actions in order to prevent compliance-related non-conformities from the World Bank and the Republic of Moldova's CPAs/LPAs authorities, as implied in the Project's implementation, roles and responsibilities, and reporting implementation performances to the World Bank and to the Borrower.

The specific objectives of the evaluation of compliance with World Bank's ESSs (gap analysis) are to determine applicable measures and actions specific to the Project's life cycle to be in line with the relevant national ES framework. The scope of the evaluation of compliance with applicable WB's ESSs and national framework is to implement the Project smoothly and avoid compliance-related nonconformities with legal requirements.

<sup>14</sup> <https://thedocs.worldbank.org/en/doc/837721522762050108-0290022018/original/ESFFramework.pdf#page=111&zoom=80>

**Table 7. The GAPS analysis of WB's requirements and national legislation**

WB standards and requirements	Relevant national legislation	GAPs and proposed Project actions
<p>ESS 1- Assessment and Management of Environmental and Social Risks and Impacts</p>	<p>Law no. 86/2014 on Environmental Impact Assessment.            Law on transparency in decision-making No. 239/2008            Law on access to public information No. 148/2023</p>	<p>The Project with Low or Moderate impacts, which are not included in Annexes 1 and 2 of the law, are not subject to an EIA.            There are no requirements for all social impacts and risk assessments. If the EIA is not needed, no public consultation is required.            The proposed actions are:</p> <ul style="list-style-type: none"> <li>- To develop this ESMF according to the ESS1 requirements and conduct E&amp;S risk assessments and prepare, consult, and disclose ESMPs at the subproject level</li> <li>- To develop SEP and undertake stakeholder engagement at the project and subproject levels, and disclose appropriate information in accordance with ESS 10.</li> <li>- To develop an ESCP and implement all measures and actions set out in the legal agreement, including the ESCP.</li> <li>- Conduct monitoring and reporting on the environmental and social performance of the project against the ESSs.</li> <li>- However, for any decision taken by Local Public Authorities, the public consultations should be conducted.</li> </ul>
<p>ESS 2 – Labor and Working Conditions</p>	<p>Labor Code of the Republic of Moldova no.154/2003            Law on Occupational health and safety no.186/2008            Law on quality in construction no. 721 /1996            Urban Planning and Construction Code No. 434 /2023 (UPCC)</p>	<p>Overall, the Moldovan OHS legislation is extensive, and generally, in line with the provisions set out in ESS2. No provision for a grievance mechanism for workers related to all labor aspects, including SEA/HS. No requirement for the training of the workers related to SEA/HS.            The proposed actions are:</p> <ul style="list-style-type: none"> <li>- The development of the labor management procedures (LMPs) applicable to the project and attached to the ESMF. These procedures outline the management of project workers, in accordance with national law and the ESS 2. The procedures will address the way in which this ESS will apply to different categories of project workers including direct workers, and the way in which the Borrower will require third parties (contracted workers) to manage in accordance with ESS 2. In addition, a Grievance Redress Mechanism for workers will be developed.</li> <li>- The Contractor’s will develop their LMPs and will adopt a Code of Conduct on SEA/HS according to the requirements of the Project LMPs.</li> </ul> <p>Overall, Moldova’s labour protection framework is well-developed. The Labour Code No. 154/2003 and the Law No. 186/2008 on Occupational Health and Safety provide core obligations for employers that are consistent with ESS2 and the World Bank Environmental, Health and Safety (EHS) Guidelines, including:</p> <ul style="list-style-type: none"> <li>• mandatory use of personal protective equipment (PPE) appropriate to identified risks;</li> <li>• fall protection measures for work at height (e.g., guardrails, scaffolding, safety harnesses);</li> <li>• safety requirements for excavations and ditches, including shoring, signaling, and access control;</li> <li>• workplace sanitation and welfare facilities (potable water, sanitary units, changing rooms, first aid);</li> <li>• OHS training, workplace risk assessments, and designation of competent OHS personnel;</li> </ul>

**Moldova Energy Efficiency Revolving Mechanism (MEERM)**  
**Environmental and Social Management Framework**

		<ul style="list-style-type: none"> <li>obligations for incident reporting and investigation.</li> </ul> <p>These aspects will be directly adopted and enforced on all MEERM worksites in line with ESS2 and the World Bank EHS Guidelines.</p> <p>In order to fulfill ESS2 compliance, the following actions are proposed:</p> <p>Development of a Project-specific Labor Management Procedures (LMP) as an annex to the ESMF. The LMP will detail the management of all categories of project workers (direct, contracted, and subcontracted), aligning national legal requirements with ESS2 and EHS Guidelines. It will include a dedicated Workers' Grievance Mechanism with confidential channels and SEA/SH-sensitive handling procedures.</p> <p>All Contractors, through their subproject-specific plans will need to comply with the aspects described in the Project LMP.</p> <p>Implementation of these measures ensures that the Project not only relies on the strengths of Moldova's existing OHS and labour legislation but also integrates additional aspects required under the ESF, thereby providing a comprehensive framework for safe, fair, and rights-respecting working conditions throughout MEERM implementation.</p>
ESS 3 - Resource Efficiency and Pollution Prevention and Management	<p>Law no. 303/2013 on water supply services;</p> <p>Law on industrial safety of dangerous industrial facilities no. 116 /2012;</p>	<p>Assessment of risks and impacts and proposed mitigation measures related to relevant requirements of ESS 3, including raw materials, water use, air pollution, hazardous materials, and hazardous waste, are included within the scope of the ESMF, and will be included further in the site-specific ES instruments as relevant.</p>

<b>WB standards and requirements</b>	<b>Relevant national legislation</b>	<b>GAPs and proposed Project actions</b>
	<p>Law on wastes no. 209 /2016;</p> <p>Law on atmospheric air quality nr. 98/2022.</p>	<p><b>Community exposure to hazardous materials (ACM, Dust).</b> While an Asbestos Management Plan is mentioned, the community-facing measures for preventing air and soil contamination are not explicitly detailed.</p> <p><b>External hazardous material and pollution control-</b> the ESMP must specifically detail measures to minimize off-site impacts. <b>Air Quality-</b>require stringent dust suppression (daily water spraying of demolition/excavation areas) and use of enclosed chutes/containers for waste removal. <b>Hazardous Waste Protocol -</b> ensure <b>Asbestos-Containing Materials (ACM)</b> are handled by licensed sub-contractors, securely wrapped/sealed on site, and transported in dedicated, covered vehicles to prevent exposure to the community along transport.</p>

**Moldova Energy Efficiency Revolving Mechanism (MEERM)**  
**Environmental and Social Management Framework**

<p>ESS 4- Community Health and Safety</p>	<p>Law no.131 /2007 on road safety;  Criminal Code of the Republic of Moldova no. 985/2002;  Administrative Code of the Republic of Moldova no. 116/2018;  Code of urban planning and construction nr. 434/2023  Law on state supervision of public health no. 10/ 2009.  Governmental Decision regarding the minimum safety and health requirements for temporary or mobile construction sites no.80/ 2012  Law on the social inclusion of people with disabilities nr. 60/2012 (chapter III accessibility)</p>	<p>The national legislation does not include provisions related to pedestrian protection, public consultations, compensation procedures, etc.</p> <p>The proposed actions are:</p> <ul style="list-style-type: none"> <li>- To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life cycle from both routine and non-routine circumstances.</li> <li>- To avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials.</li> <li>- To have in place effective measures to address emergency events.</li> <li>- To ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities.</li> <li>- To assess subproject-specific risks and describe the appropriate mitigation measures in subproject ESMPs.</li> <li>- To establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, including SEA/SH complaints.</li> <li>-</li> </ul> <p><b>The national framework is not strong enough to require or detail effective measures to address emergency events that could affect the community.</b> This action involves developing an Emergency Preparedness and Response Plan (EPRP). The general provisions of the Code of urban planning and construction, No. 434/2023, do not define the structure of the EPRP; however, the rules on emergencies affecting employees are part of it. So, the contractor must design and implement the EPRP in direct compliance with the national standards and related regulations concerning emergency evacuation procedures and protocols specific to fire and natural disaster response within the construction zone and the occupied parts of the public building.</p> <p>In alignment with ESS 5, the Project prioritizes the avoidance and minimization of economic displacement. Recognizing that renovation or construction activities within public buildings may constitute a 'defect' in the leased property—as defined under Article 1255 of the Civil Code—the Public Authority, in coordination with the Project, could propose the following protections for affected private businesses and small enterprises: the proportional rent reduction. In instances where Project activities reduce the property's usability (e.g., restricted access, noise, or utility interruptions), the ESMF mandates a proportional rent reduction based on the diminished use of the property. This right shall remain in effect until the disruption is fully remedied. Elaboration of the Livelihood restoration planning. To outline these measures, and for impacts extending beyond simple property defects—such as significant loss of foot traffic or forced temporary closure—the Project will develop site-specific Livelihood restoration plans (Annex 5). Another measure could be assistance for employees of small businesses to ensure that wage losses resulting from Project-induced 'defects' or closures are mitigated.</p>
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**Moldova Energy Efficiency Revolving Mechanism (MEERM)**  
**Environmental and Social Management Framework**

<p>ESS 8. Cultural Heritage</p>	<p>Law No. 1530/1993 on the protection of monuments;   Order No. 52 of 10.12.2021 On the approval of the Guide for interventions on historical buildings in Chisinau</p>	<p><b>Limited stakeholder engagement on heritage value.</b> The broader community, cultural institutions, and local specialists whose interests are tied to the CH value are not explicitly included in the consultation process regarding project design changes.</p> <p><b>Targeted consultation on CH -</b> the PIU must conduct <b>targeted consultations</b> with key stakeholders, including the <b>Ministry of Culture, local heritage experts, and users/advocates of the monument</b>, to discuss the scope of works, proposed EE interventions, and how the CH values will be preserved and enhanced.</p> <p><b>Insufficient supervision authority.</b> Conservation and restoration works require strict oversight from specialized bodies, which standard construction supervision contracts may not guarantee.</p> <p><b>Specialized supervision and PIU oversight.</b> Ensure that the Project's supervision arrangements include <b>Mandatory external supervision/monitoring</b> by the state bodies for monument protection (<b>Art. 27</b> of Law No. 1530/1993), whose findings must be acted upon by the PIU. <b>PIU oversight</b> to confirm that the Contractor engages specialized, authorized personnel for any conservation or restoration works, as required by law.</p>
<p>ESS 9- Financial Intermediaries;</p>	<p>Law on public finances and budgetary and fiscal responsibility No. 181/ 2014</p>	<p><b>Absence of a Foundational Environmental and Social Management System (ESMS).</b> The newly structured EE Fund lacks the formal policies, procedures, and institutional tools to screen, assess, and monitor the E&amp;S performance of its entire sub-project portfolio.</p> <p><b>Design and legally adopt a World Bank- compliant ESMS:</b> The component's advisory support ("<b>design of the investment strategy... legislative framework</b>") must prioritize the development of a comprehensive ESMS for the EE Fund. The ESMS must include: a <b>risk screening mechanism</b> for sub-projects (e.g., classifying renovations as B or C), a detailed <b>E&amp;S exclusion list</b> (prohibiting high-risk activities like significant land acquisition), and procedures for <b>E&amp;S due diligence and supervision</b>. The ESMS should be formally <b>adopted</b> by the Fund's governing body and reflected in the Fund's internal operational manual.</p> <p><b>Legal/regulatory vacuum for E&amp;S integration.</b> The absence of specific national legislation for this type of revolving mechanism and public building EE financing means that E&amp;S requirements are not inherently binding in the legal agreements between the Fund and its clients/implementers.</p> <p><b>Integrate E&amp;S into the Fund's financing legal instruments.</b> The legislative framework and financial engineering design must explicitly incorporate the ESMS requirements into all <b>Energy Service Agreements (ESAs)</b> and other financing or implementation contracts. This ensures that the sub-borrower/client (the public building owner) and the service providers are <b>contractually obligated</b> to</p>

**Moldova Energy Efficiency Revolving Mechanism (MEERM)**  
**Environmental and Social Management Framework**

		comply with national laws <i>and</i> the World Bank ESSs (e.g., ESS 2-Labor, ESS 4-Community Health & Safety, ESS 8-Cultural Heritage)
ESS 10-Stakeholder Engagement and Information Disclosure	Law on access to information of public interest nr. 148/2023  Law no. 239 / 2008 on Transparency in Decision Making	<p>Limited legal framework on public disclosure during all implementation stages of the Project. The national legal framework includes requirements on consultation during the environmental impact assessment, on participation of citizens in the decision-making process, and on the possibility of having access to information of public interest.</p> <p>No provision on examination of the anonymous grievances.</p> <p>The proposed actions are:</p> <ul style="list-style-type: none"> <li>- To develop and implement a SEP as part of the ESF package of this Project, disclosed and consulted on for the Project, consistent with ESS10. The SEP may be updated (and redisclosed) as needed during Project implementation.</li> <li>- To carry out consultations with local stakeholders in the context of subprojects, including consultations on ESMPs and temporary relocation plans, where relevant.</li> <li>- To establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, including SEA/SH complaints.</li> </ul>

According to the GAP analysis, an ESCP, ESMF, including LMPs and SEP shall be developed with proposed measures and actions to ensure compliance with relevant applicable ESSs requirements by promoting shared prosperity and sustainable development.

**3.5 World Bank Environmental, Health and Safety Guidelines**

The Environmental, Health, and Safety (EHS) Guidelines are technical reference documents with general and industry-specific examples of Good International Industry Practice.

The applicability of the EHS Guidelines should be tailored to the hazards and risks identified for each project, based on the results of an environmental assessment that considers site-specific variables, such as the host country context, the environment's assimilative capacity, and other project-specific factors.

When host country regulations differ from the levels and measures presented in the EHS Guidelines, projects are expected to achieve the more stringent level. If less stringent levels or measures than those provided in these EHS Guidelines are deemed appropriate, given specific project circumstances, a full and detailed justification for any proposed alternatives is required as part of the site-specific environmental assessment. This justification should demonstrate that the choice for any alternate performance levels is protective of human health and the environment.

The general EHS Guidelines provide the supporting references and good practices related to the following aspects:

<b>1. Environmental</b>
<ul style="list-style-type: none"> <li>- Air Emissions and Ambient Air Quality</li> <li>- Energy Conservation</li> <li>- Wastewater and Ambient Water Quality</li> <li>- Water Conservation</li> <li>- Hazardous Materials Management</li> <li>- Waste Management</li> <li>- Noise</li> <li>- Contaminated Land</li> </ul>
<b>2. Occupational Health and Safety</b>
<ul style="list-style-type: none"> <li>- General Facility Design and Operation</li> <li>- Communication and Training</li> <li>- Physical Hazards</li> <li>- Chemical Hazards</li> <li>- Biological Hazards</li> <li>- Radiological Hazards</li> <li>- Personal Protective Equipment (PPE)</li> <li>- Special Hazard Environments</li> <li>- Monitoring</li> </ul>
<b>3. Community Health and Safety</b>
<ul style="list-style-type: none"> <li>- Water Quality and Availability</li> <li>- Structural Safety of Project Infrastructure</li> <li>- Life and Fire Safety (L&amp;FS)</li> <li>- Traffic Safety</li> <li>- Transport of Hazardous Materials</li> <li>- Disease Prevention</li> <li>- Emergency Preparedness and Response</li> </ul>
<b>4. Construction and Decommissioning</b>
<ul style="list-style-type: none"> <li>- Environment</li> <li>- Occupational Health &amp; Safety</li> <li>- Community Health &amp; Safety</li> </ul>

## **4 POTENTIAL ENVIRONMENTAL AND SOCIAL RISK IMPACTS AND STANDARD MITIGATION MEASURES**

This section discusses the preliminary identification of potential environmental and social risks and impacts that may arise from the implementation of the Project, and proposes measures to mitigate them at all stages of the Project's activities, including design, construction, and operation. Ultimately, all proposed measures to prevent or minimize possible adverse effects related to construction will be included by CNED in the tender or contract documents, thus becoming mandatory elements of contracts for construction work and construction supervision.

It is essential to note that the environmental and social impacts identified at this stage are preliminary and generic in nature, and will require further elaboration in terms of potential occurrence (likelihood) and severity once the exact locations and sub-projects are known.

### ***4.1 Potential Positive Impacts***

Central Public Administration Buildings, as direct project beneficiaries, will make the most of reduced energy costs following the implementation of investments.

Expected annual energy savings are composed of 20,000 MWh from public building retrofits. The project will also improve the efficiency of heat supply to buildings connected to district heating through installation of individual heat substations and related network optimization. The expected energy savings can be illustrated by translation into reduction of the annual energy consumption of 3,200 single family houses. Another viewpoint is the avoidance of heat and power generation capacities at the level of 14 MW, for a case of a combined heat and power plant.

Annual GHG emission savings estimated in the level of 6,500 tons of CO<sub>2</sub> annually, as aggregated by type of used energy and related national emission coefficients.

The project has the potential to cut energy costs for energy supply the public buildings under norm conditions at EUR 2.6 million annually, as average over 20 years lifetime, which translates into the projects overall simple payback time of 9-12 years.

Preliminary energy audits have been conducted in 10 representative public buildings and confirm that the buildings energy demand can be reduced between 45 to 65 percent, depending on the level of intervention for retrofit, from standard to advanced. For DH-supplied buildings, savings will be achieved through improved supply control, reduction of network losses, and lowering of required supply capacity. All measures involve commercially available technologies.

Public building staff and users shall benefit of improvement working and service provision condition, improvement of the comfort level based on the improved heat and hot water supply system, lighting and indoor air quality.

Additionally, the Project will promote private sector participation in developing sustainable solutions for energy efficiency in public buildings.

### ***4.2 Potential Risks and Negative Impacts and Mitigation Measures***

This section identifies the potentially ES risks and impacts that can arise during the implementation of the specific Project's activities and proposes standard mitigation measures for every identified risk or potential negative impact.

Social risks associated with the rehabilitation of public sector buildings are likely to be **low to medium in magnitude**, site specific, predictable, and contained within existing site boundaries.

The project will work within existing public buildings, so land acquisition will not be required, and the project is not expected to cause any physical or economic displacement.

Based on information received during project preparation, **social risks of the project include:** i) labor and occupational health and safety risks related to small civil works from rehabilitation of public buildings; ii) temporary relocation of staff and users of target buildings, as well as temporary disruption, suspension or relocation of services; iii) community health and safety risks from small works, including dust, noise, vibrations, exposure to hazardous materials, traffic safety and pedestrian circulation; iv) SEA/SH risks from a limited amount of labor influx, particularly in works that will be carried out in buildings that provide community services such social service providers center and medical institutions as well as in existing GBV shelters. Given that some buildings may house public services, there is a risk of disproportionate impacts on vulnerable groups and individuals.

*Risks related to the need to relocate or potentially disrupt services or office space.* This risk may be more acute in the case of medical centers/ temporary residential centers for children /GBV center and other public-facing buildings. Each subproject should assess these risks, consider alternatives to avoid relocation (such as a phased approach to construction), and, if unavoidable, the ESMP should include a relocation plan aimed at ensuring the health and safety of users and employees and service users, as well as preventing the disruption of services to communities. Please consider also the possibility of choosing less complex projects that will achieve the objective.

*Impacts on vulnerable groups.* Since many of the potential buildings cater to vulnerable groups, there should be a clear focus on risks of disproportionate impacts to these groups. For example, a person who cannot walk to an alternative location due to a disability (or cannot use an alternative pedestrian path that includes stairs) is more vulnerable and disproportionately affected by construction-related access restrictions. Similarly, elderly persons, patients accessing medical or social services, children in educational facilities, or survivors accommodated in GBV shelters may experience heightened disruption, anxiety, or exposure to unsafe conditions if adequate mitigation measures are not in place. Therefore, during both design and construction phases, the Project must prioritize uninterrupted access to essential services, provision of safe alternative routes that are fully accessible, timely information on works planning, and targeted engagement with facility managers and service providers to avoid any deterioration in the well-being, dignity, and safety of vulnerable users.

SEA/SH risks. Any contact between workers and the community carries sexual exploitation and abuse risks. These can be mitigated by codes of conduct for project workers, training, specific mechanisms for the grievance mechanism in the SEP, and by ensuring separation between workers and the community. In the case of this project, it would be beneficial to coordinate with the WEGS project on specific service providers, referral pathways, and other relevant details.

Table 8. Risk category assessment and mitigation measures

Risk Type	Category	Description	Core Mitigation Strategy
<b>Environmental Risks</b>	<b>Moderate</b>  Impacts are typically <b>site-specific, predictable, and reversible</b> through standard mitigation measures (C&D waste, noise, dust, acoustic, E&C waste) and cultural heritage. The project's overall impact is positive, driven by long-term energy savings and reduced emissions.	<p><b>Construction Waste &amp; Debris Management:</b> Generation of significant construction and demolition (C&amp;D) waste (old insulation, windows, roofing, plaster, etc.), including potentially hazardous materials like asbestos or lead-based paint, which could contaminate soil and water if not handled properly.</p> <p><b>Air and Noise Pollution:</b> Temporary increase in local air pollution (dust, vehicle emissions) and noise levels during the rehabilitation works (drilling, hammering, heavy machinery operation), impacting building occupants and nearby communities.</p> <p><b>Acoustic Impact (Heat Pumps):</b> Advanced energy technologies like air-source heat pumps can generate constant low-frequency noise and vibrations, potentially disturbing building occupants or neighbors.</p> <p><b>Hazardous Electronic &amp; Chemical Waste:</b> Decommissioning old boilers, mercury-containing fluorescent tubes, and old cooling systems (refrigerants) can lead to soil/water contamination if disposed of as regular C&amp;D waste.</p> <p><b>End-of-Life Solar PV Management:</b> Future disposal of damaged or expired Solar PV panels and lithium-based storage (if applicable) presents a long-term</p>	<p>Develop a <b>Construction Waste Management Plan (CWMP)</b> requiring contractors to: i) Segregate and manage C&amp;D waste appropriately. ii) Prioritize recycling and reuse of non-hazardous materials. iii) Conduct mandatory screening for asbestos/lead-based paint <i>before</i> demolition/retrofitting. iv) Dispose of hazardous materials in designated, licensed facilities following national and international standards.</p> <p>Implement a <b>Site-Specific Environmental Management Plan (ESMP)</b>. i) Use water suppression for dust control. ii) Restrict heavy construction activities to specified daytime hours (as per local regulations). iii) Require contractors to maintain vehicles and equipment properly to minimize emissions. iv) Provide advance notice to neighbors and building occupants about the work schedule.</p> <p><b>Acoustic Design &amp; Screening:</b> Install units on vibration-isolation pads and use acoustic enclosures or barriers if units are placed near windows or residential boundaries.</p> <p><b>To conduct the specific Hazardous Waste Inventory</b> of all old electrical and HVAC components before removal. Require contractors to use specialized e-waste recyclers and certify the safe recovery of refrigerants (CFCs/HFCs).</p> <p><b>Extended Producer Responsibility (EPR):</b> Include "take-back" clauses in procurement contracts (Component 2) requiring suppliers to reclaim panels at end-</p>

		<p>environmental hazard due to heavy metals.</p> <p><b>Visual and glare impacts:</b> Reflection and glare from newly installed rooftop Solar PV panels can cause visual discomfort for occupants of neighboring taller buildings or distract nearby traffic.</p> <p><b>Protection of Cultural Heritage:</b> For older public buildings with historical or architectural value, external thermal insulation or window replacement may permanently alter or damage the building's heritage character.</p>	<p>of-life. Ensure the ESMP includes specific storage protocols for broken panels during the construction phase.</p> <p><b>Glare analysis &amp; anti-reflective coating:</b> Require the use of anti-reflective (AR) coated glass for all Solar PV modules. Perform a glare study during the "economically viable" assessment to adjust panel tilt and orientation.</p> <p><b>Heritage Screening:</b> Perform a "Chance Find" and Cultural Heritage assessment for each building. Use "internal" insulation or heritage-matched materials for buildings with historical significance to maintain architectural integrity.</p>
<p><b>Social Risks</b></p>	<p><b>Moderate</b></p>	<p><b>Occupational Health and Safety (OHS):</b> Risks of accidents, injuries, and health issues for construction workers due to working at heights, handling heavy materials, use of power tools, and exposure to dust or hazardous substances (e.g., during asbestos removal).</p> <p><b>Interruption of Public Services/Access:</b> Retrofitting public buildings (such as institutions, office buildings, and government offices) may temporarily disrupt essential services, restrict public access, or impact the daily activities of users/staff. Retrofitting buildings of social service providers' centers and medical institutions, as well as existing GBV shelters, may require the temporary relocation of beneficiaries and impact daily service provision.</p>	<p>Mandatory adherence to strict OHS protocols (e.g., use of Personal Protective Equipment - PPE, safety harnesses, scaffold certification).</p> <p>Ensure all workers receive OHS training and site induction.</p> <p>Establish transparent incident reporting and emergency response procedures.</p> <p>Supervision Consultants (Component 1) must include OHS experts to monitor compliance.</p> <p>Develop detailed <b>Construction Work Plans</b> that prioritize continuity of essential services.</p> <p>Schedule disruptive works (e.g., noise-intensive activities) during non-peak hours, weekends, or holidays.</p> <p>Establish clear, safe alternative access routes for staff and the public during construction.</p> <p>Implement a <b>Communication Plan</b> to inform building users and the public about temporary changes.</p>

		<p><b>Stakeholder and Grievance Management:</b> Concerns or complaints from the public, building users, or contractors regarding project activities, OHS issues, procurement fairness, or compensation (if any minor land access is required).</p> <p><b>Unfair labor practices:</b> Risk of unfair wages, poor working conditions, or non-compliance with national labor laws by contractors hired for the rehabilitation works.</p> <p><b>Sexual Exploitation, Abuse, and Harassment risks related to work:</b> concerns or potential complaints from public building workers.</p> <p><b>Exclusion of Universal Accessibility:</b> Energy retrofits that replace doors and windows may fail to address (or even worsen) physical barriers for Persons with</p>	<p><b>The temporary relocation plan for staff / GBV shelter residents</b> can be operated in case of longer restrictions of access/impossibility to provide services.</p> <p>Establish a transparent and accessible <b>Grievance Redress Mechanism (GRM)</b> at the project and site level, ensuring a clear process for receiving, addressing, and resolving complaints promptly and confidentially.</p> <p>Conduct regular <b>stakeholder communication</b> and continuous engagement throughout the project lifecycle.</p> <p>Ensure labor provisions and codes of conduct are <b>explicitly included</b> in all procurement and contractual agreements (Component 1).</p> <p>Require contractors to comply with all national labor laws, including minimum wage, working hours, and non-discrimination.</p> <p><b>Technical prequalification:</b> Include specific technical experience requirements in bidding documents for Component 1. Provide mandatory "Green Technology" training workshops for local contractors under Component 1 (Capacity Building).</p> <p>Project supervision (Component 1) should include checks on labor compliance.</p> <p><b>SEA/SH</b> are assessed as low and mitigable by complying with the Code of Conduct by all Project's workers and operation of a grievance mechanism respecting <b>confidential grievances</b>.</p> <p><b>Universal Design Integration:</b> Mandate that all door/entrance replacements comply with international accessibility standards (e.g., width, threshold height).</p>
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		<p>Disabilities (PWD), missing an opportunity for social inclusion.</p> <p><b>Potential for income loss for private businesses and employees:</b> Since the project involves the renovation of public buildings, there is a risk that the design and ESMP may fail to adequately identify or compensate for income losses to private businesses operating within those facilities. This includes businesses that may face temporary or permanent relocation due to civil works, along with the associated loss of livelihoods for their employees</p>	<p>Include PWD advocacy groups in the stakeholder engagement process.</p> <p>Develop and implement formal <b>Livelihood Restoration Plans (LRPs)</b> to minimize and mitigate any instances where project activities lead to a loss or reduction of business income. These plans should outline clear assistance structures and recovery support to ensure economic stability for affected stakeholders. The project will prioritize buildings where ESS5 impacts to businesses can be fully avoided or mitigated without cash/financial compensation.</p>
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#### **4.2. Temporary disruptions to services and businesses**

The assessment of resettlement impacts and access restrictions focuses on the energy-efficient retrofitting of public buildings owned by central public authorities. Under Component 1, the core investment driver funds physical works such as building envelope measures—including thermal insulation of walls and roofs and high-performance window replacement—alongside system upgrades like HVAC, LED lighting, and rooftop Solar PV. These interventions are not expected to involve land acquisition or permanent physical displacement, as the activities are confined to existing footprints. However, the project carries inherent risks of temporary physical disruption and restricted access to essential public services.

Activities such as wall insulation and window replacement will result in temporary physical disruptions around building perimeters, potentially impacting daily service provision in sensitive institutions like medical facilities, social service centers, and GBV shelters. Furthermore, the implementation of advanced technologies like rooftop Solar PV necessitates rigorous structural assessments to prevent safety hazards or building instability that could lead to emergency access restrictions. In cases where retrofitting makes a building temporarily uninhabitable or hinders service delivery, the project anticipates the need for temporary relocation of beneficiaries and staff. These activities may also disrupt private businesses operating within the buildings.

To manage these risks, detailed construction work plans will be developed to prioritize the continuity of essential services by scheduling noise-intensive or disruptive activities during non-peak hours, weekends, or holidays. To prevent execution delays that might prolong access restrictions, the project mandates external peer reviews of designs and strict adherence to standardized measurement and verification protocols, such as the International Performance Measurement and Verification Protocol (IPMVP). Contractors are also required to implement site-specific traffic and pedestrian management plans to establish clear and safe alternative access routes for both staff and the public.

The renovation of public buildings may lead to localized disruptions affecting private businesses and service providers operating within or immediately adjacent to the project sites. While these impacts are anticipated

to be temporary and site-specific, they present a risk of **income loss** for both business owners and their employees. Such disruptions may arise from: physical relocation (temporary or permanent) necessitated by civil works, restricted access for customers, clients, or delivery services, utility interruptions (power, water, internet) during the renovation phase. There is a specific risk that if the project design and the ESMP do not adequately identify these entities early, the financial impacts on small businesses and the livelihoods of their staff may be overlooked.

To address these risks, the project will implement the mandatory screening of all renovation sites to census private businesses and employees currently operating within the public facilities. For any instance where income loss is identified, a dedicated **Livelihood Restoration Plans (LRPs) (Annex 5)** will be prepared to outline assistance methodologies and support measures to ensure economic recovery.

A comprehensive communication plan will be implemented to inform building users of temporary changes. For highly sensitive sites, a temporary relocation plan will be operationalized if services cannot be maintained on-site. Oversight of these measures is supported by Component 1, which finances supervision consultants to monitor environmental, health, and safety protocols as well as labor compliance. Additionally, a transparent and accessible grievance redress mechanism will be established at both the project and site levels to promptly and confidentially address concerns regarding access, safety, or service disruptions.

During project preparation, subprojects should be screened to evaluate whether they may cause involuntary economic displacement, including any loss of income to businesses or individuals. Measures to avoid such impacts must be considered during the design phase. If impacts cannot be avoided, the project will conduct and document an assessment of the effects on income and livelihoods. Based on this assessment, the parties will discuss and agree on options—such as alternative locations, or other forms of assistance—to improve, or at least restore, the incomes of both businesses and employees. The decisions and the process description will be incorporated into an income restoration plan prepared in parallel with the ESMP and subject to Bank approval. The implementation of assistance measures should be completed before any impact occurs.

#### **4.2.1 Risks and Impacts during the Design and Construction Stages**

The potential environmental and social impacts that could appear during the rehabilitation or retrofitting of existing public buildings for improvement of their energy efficiency (e.g. replacement of roof sheets, windows, and facades in buildings, etc.) are associated with noise, dust, air and water pollution, solid/demolition waste management, health hazards, and labor safety issues, etc.

Risks are expected to be typical for construction/rehabilitation works related to various energy supply or energy efficiency activities in public buildings, which are temporary by nature and site-specific, and can be easily mitigated by applying best construction and/or energy supply or energy efficiency practices, along with relevant mitigation measures.

Table 9 below includes the potential impacts and mitigation measures related to the preparation, design, and construction stages during the implementation of Component 1 of the MEERM.

The following table provides a clear, stage-by-stage analysis of potential risks and impacts for the Energy Efficiency Renovation of Public Buildings (Components 1 and 2), with enhanced mitigation measures that directly address your concerns, particularly regarding sensitive services.

**Table 9. Environmental and Social Impact Analysis and Core Mitigation Strategies**

Activity / Stage	Specific Risks and Impacts	Mitigation Measures
<b>Pre-Design &amp; Design</b>	<p><i>Failure to Address Service Disruption or Adequacy of Relocation.</i> The risk is that the project design and ESMP fail to adequately assess, plan for, or provide sufficient resources for temporary relocation or phased construction for sensitive public buildings (e.g., health institutions, schools, temporary placement centers).</p>	<ol style="list-style-type: none"> <li>1. <i>Prioritize phased approach</i>– when feasible, the project design must prioritize a phased approach to construction to avoid or minimize the temporary relocation of sensitive services.</li> <li>2. <i>Mandatory ES Screening &amp; Planning</i> - conduct proper ES screening for every subproject to inform the preparation of a ESMP checklist development or site-specific ESMP..</li> <li>3. <i>Temporary relocation Plan (if unavoidable)</i>- if temporary relocation is deemed necessary, the ESMP must include a specific Temporary Relocation Plan fulfilling the requirements of this ESMF. This plan must ensure the adequacy of the relocation spaces in terms of fire and life safety, community health and safety, and access.</li> <li>4. <i>Inclusion of relevant aspects in contracts</i>-relevant requirements for labor conditions and community H&amp;S, including service disruption and relocation protocols, must be included in the bidding documents and contracts.</li> <li>5. <i>Information and consultation</i>-conduct inclusive and accessible consultations with management, representatives, and vulnerable groups to inform them about planned works and gather feedback.</li> </ol>
<b>Pre-Design &amp; Design</b>	<p><i>Loss of income for businesses and business employees.</i> The risk is that the project design and ESMP fail to adequately identify and compensate for loss of income to private businesses that may have to relocate temporarily or permanently due to works in buildings under renovation, or loss of income or livelihoods for employees of such businesses.</p>	<ol style="list-style-type: none"> <li>1. Screen subprojects for impacts: An evaluation of whether the project would cause involuntary economic displacement (including loss of income to businesses or individuals).</li> <li>2. Measures to avoid involuntary economic impacts should be considered during the design phase</li> <li>3. If the impacts are unavoidable, an assessment of the impacts on income and livelihoods will be carried out and documented</li> </ol>

		<p>4.Options for alternative location or assistance to improve or at least restore the income (of both the business and employees) from potential losses, including loss of employment/wages, should be discussed and agreed with the affected business and individuals.<sup>15</sup></p> <p>5.The decisions and description of the process should be incorporated in a income restoration plan to be prepared in parallel with the ESMP, subject to Bank approval.</p> <p>6.The implementation of assistance measures should be carried out before impacts take place.</p>
<p><b>Pre-Design &amp; Design</b></p>	<p><i>Failure to Comply with National Heritage Law.</i> Risk of damage to existing buildings listed in the State Register of Monuments or located within protected zones due to lack of specialized planning.</p>	<p>1. <i>Legal Screening</i> - The PIU must screen all potential subprojects against the State Register of Monuments (<i>Registrul monumentelor Republicii Moldova ocrotite de stat</i>) to determine if the building or its location has protected status. According to Government Decision No. 116/2025 approving the Regulation on the organization and functioning of the National Council of Historical Monuments, the owner of a building included in the Register of State-Protected Monuments of the Republic of Moldova shall prepare a historical study of the building based on data from the archives and shall prepare a sketch of measures, that could bring the modifications to the building/construction. The sketch and the study, including all other documents based on the Regulation, shall be submitted for examination to the National Council of Historical Monuments. After examination, the Council shall issue an opinion supporting or rejecting the modifications to the building that has been declared a historical monument. Based on the endorsement note issued by the National Council of Historical Monuments, the PCA could start renovation activities.</p>
<p><b>Pre-Design &amp; Design</b></p>	<p><i>Unmitigated Service Disruption (e.g., Health/School Function).</i> The design fails to incorporate a phased approach, resulting in mandatory, complex, and high-risk</p>	<p>1. <i>Mandatory Phasing Plan</i> -the PIU/Design Team must explicitly detail a phased construction schedule within the project design to avoid or minimize temporary disruption to the maximum extent possible</p>

<sup>15</sup> In cases where penalties for early lease termination are paid to owners, these will be considered as part of the replacement cost, but additional assistance may have to be provided to meet replacement cost as required by ESS5.

	temporary relocations or prolonged closures of sensitive public services.	(e.g., working on sections/floors during non-operational hours or school breaks). 2. <i>Temporary relocation plan (if unavoidable)</i> - if temporary relocation is essential, the design must allocate budget and resources for a detailed Temporary Relocation Plan. This plan must ensure that the relocation spaces are assessed and guaranteed to meet fire and life safety, community health and safety, and accessibility requirements before any work begins.
<b>Pre-Design &amp; Design</b>	<i>Inclusion of hazardous materials in technical documentation.</i> The design fails to specify procedures for identifying, handling, and removing existing hazardous materials (such as Asbestos-Containing Materials - ACM) and/or specifies the use of toxic materials (e.g., paints, solvents) during the renovation.	1. <i>Hazardous materials management specification</i> - the technical documentation must include a requirement for an Asbestos Survey (if deemed likely based on building age/type) and a detailed procedure for the safe and authorized removal, packaging, transport, and disposal of ACM (compliant with the ESMF Annex 6 and national law). 2. <i>Non-toxic material mandate</i> - specify the exclusive use of low-VOC (Volatile Organic Compound) or non-toxic materials (paints, sealants, insulation) for all internal works to protect the health of workers and future building occupants.
<b>Pre-Design &amp; Design</b>	<i>Failure to Transfer E&amp;S Obligations to the Contractor.</i> Critical E&S requirements (OHS, GRM, SEA/SH) are omitted from the technical and contractual documents, rendering them unenforceable during the construction phase.	3. <i>Mandatory ESHS and social clauses</i> - ensure all bidding and contract documents explicitly include: The Code of Conduct for workers (including clear penalties for SEA/SH) and a requirement for workers to sign the code of conduct and for the employer to train the workers in the code of conduct. The Chance Find Procedure (CFP) as a contractual annex. The requirement for the Contractor to develop and implement site-specific ESHS plans based on the requirements of national law (OHS Management Plan, Waste Management Plan) prior to mobilization. The requirement for the contractor to maintain a grievance mechanism for project workers, as further described in the LMP. Contractual language mandating the Contractor's participation in the Project's Grievance Redress Mechanism (GRM).
<b>Pre-Design &amp; Design</b>	<i>Increased Soil/Water Pollution Risk.</i> Lack of design measures for construction waste segregation, erosion control, and proper on-site material storage (e.g., in the yard or adjacent areas).	1. <i>Waste and pollution control specifications</i> - detail requirements for: Dedicated, covered areas for material storage to prevent soil contamination. Erosion and sediment control measures (e.g., silt fences) on site plans,

		especially where earthworks (even minor excavation for utilities) are planned. Segregation and disposal specifications for all waste streams (including clear demarcation between non-hazardous, hazardous, and potential CH materials).
<b>Construction</b>	<i>Occupational Health &amp; Safety (OHS) Risks.</i> Risks inherent to renovation work include falls from heights (roof and façade work), working in excavations/ditches, electrical hazards (temporary wiring and power tools), and exposure to construction waste and toxic materials (e.g., chemicals, paint dust, and potentially animals/insects).	Contractors will comply with the national law on occupational health and safety and the World Bank Groups EHS guidelines. This may include, but is not limited to: 1. <i>OHS Management Plan</i> - the Contractor must develop and implement an approved OHS Management Plan. 2. <i>Training and PPE</i> - provide training to all workers on ESHS risks and mandate the use of Personal Protective Equipment (PPE) (gloves, dust masks, hard hats, boots, etc.). Provide training and materials for foreign workers in a language they can understand. 3. <i>Site safety</i> - secure fall protection for working at heights and protection for working in excavations/ditches. 4. <i>Welfare facilities</i> - ensure adequate and separate toilet facilities for males and females (at least one compartment per 15 workers), and sufficient supplies of clean drinking water and break spaces. 5. <i>Site management</i> - keep the worksite clean, secure structural openings, and apply electrical good practices (e.g., circuit breakers, safe extension cords).
<b>Construction</b>	<i>Hazardous waste (including asbestos) and pollution.</i> Risk of improper generation, storage, or disposal of hazardous materials like Asbestos-Containing Materials (ACM) from old insulation, and Air Pollution from vehicle emissions, dust, and toxic substances from interior works (e.g., painting).	1. <i>Authorized management</i> - the contractor must be authorized or contract an authorized company for the management of hazardous wastes, including asbestos. 2. <i>Asbestos protocol</i> - asbestos waste must be collected separately, packaged, labelled, stored, and disposed of at a specifically designated place, following Law #209 and the ESMF's Annex 6 requirements. 3. <i>Dust and air control</i> - reduce dust by using water at the site and covering transport vehicles. Prohibit the use of materials/substances that emit cancerogenic and toxic substances during interior works.
<b>Construction</b>	<i>Temporary disruption of utility services.</i> Unplanned or prolonged interruptions to heating, hot water, and water supplies negatively affect the operation of public services (e.g., hospitals or schools).	1. <i>Planned utility work</i> - if possible, carry out construction works outside the heating season to avoid heat interruption. 2. <i>Minimal disconnection</i> - to the degree possible, disconnect water supply only from

		strict necessity, for no more than 2 hours, and with a preventive notice to users.
<b>Construction</b>	<i>Traffic safety and access disruption.</i> Risk of traffic accidents, injury to pedestrians, and temporary severance of access for staff, users, and the public due to construction vehicles and site closure.	<ol style="list-style-type: none"> <li>1. <i>Traffic management plan (TMP)</i>- prepare a TMP to be coordinated with Municipal Police.</li> <li>2. <i>Safe passage</i> - use signposting, warning signs, barriers, and traffic diversions. Ensure safe and continuous access to all facilities (offices, residences, shops) during active construction.</li> <li>3. <i>Public information</i> - inform the public, staff, and users about the terms of implementation and the community protection measures, including the GRM operation.</li> </ol>
<b>Construction</b>	<i>GBV/SEA/SH (Gender-Based Violence / Sexual Exploitation and Abuse / Sexual Harassment) &amp; Child Labor.</i> Risks related to inappropriate worker conduct, power imbalances, and the employment of underage workers.	<ol style="list-style-type: none"> <li>1. <i>Code of Conduct</i> - all contract workers must sign a Code of Conduct that explicitly prohibits SEA/SH and includes sanctions for non-compliance.</li> <li>2. <i>Training</i>- train all workers in the Code of Conduct and prevention of SEA/SH risks. Provide additional training/information for school workers and pupils related to SEA/SH.</li> <li>3. <i>Confidential GRM</i> - make available an accessible GRM that integrates confidential SEA/SH reporting channels and a survivor-centered response.</li> <li>4. <i>Focal Point</i> - train a GBV focal point in the PIU to handle complaints and manage the referral mechanism to local GBV service providers for timely support.</li> <li>5. <i>Child labor prevention</i> - maintain a labor registry of all contracted workers with mandatory age verification before engagement to prevent child labor.</li> </ol>
<b>Construction</b>	<i>Accidental discovery of undiscovered cultural artifacts.</i> Risk of destruction of "Chance Finds" (archaeological, historical artifacts) during ground disturbance or renovation activities (e.g., excavation for foundations, façade work).	<ol style="list-style-type: none"> <li>1. <i>Chance find Procedure (CFP) enforcement</i> - the Contractor must strictly implement the Chance Find Procedure (CFP) (as outlined in Annex 7 of the ESMF). All project workers must be trained on the CFP before construction starts. In the event of a discovery, the Contractor is obligated to halt all work in the vicinity immediately, secure the area, and notify the PIU and relevant state bodies for the protection of monuments without delay, as required by national law. No work can resume until the competent</li> </ol>

		authorities (Ministry of Culture/specialized bodies) have given official permission.
<b>Construction</b>	<i>Damage during execution.</i> Risk of damage to the monument's structure, materials, or historical elements (e.g., original façade, decorative elements) by unspecialized construction teams or lack of external oversight.	2. <i>Specialized supervision and oversight</i> - ensure that the works are conducted under the technical and scientific supervision of the specialized state bodies for monument protection, as mandated by Article 27 of Law No. 1530/1993. All repairs and conservation works must prioritize measures that prevent damage and ruin and preserve the original structures of the monument without impairing its value. Contractors must use methods and materials that align with the norms and regulations adopted by the Ministry of Culture for conservation and restoration.

In addition to the identified potential risks and impacts related to design and construction works, several risks can be related to the implementation of the technical assistance activities. Table 6 below includes the potential impacts and mitigation measures related to the implementation of technical assistance activities under the MEERM.

*Table 10: Potentially Environmental and Social Risks and Impacts of Technical Assistance Activities*

<b>Implementation support and technical assistance</b>		
<b>Activity / Stage</b>	<b>Potential Risks and Impacts</b>	<b>Mitigation Measures</b>
(i) Creation of a public revolving fund; (ii) Amendments to the regulations to allow public institutions to deposit monetized energy savings in a revolving fund; (iii) Capacity building activities	Lack of information and improper communication between the implementation entities, service providers, and beneficiaries.	SEP implementation that includes the conduction of the awareness campaign and operation of the grievance redress mechanism during the Project implementation.
	Lack of information or awareness on the project and proposed activities	
	E&S Risks from investments financed by the revolving fund	Technical assistance provided under the project for the development of the revolving fund will include establishing an Environmental and Social Management System (ESMS).

#### 4.2.2 Potential Cumulative Impacts

The proposed activities under Component 1 are not likely to generate cumulative impacts on the energy efficiency renovation in public buildings in the Republic of Moldova's Districts

They are unlikely to interact with other construction activities within the internal construction site of beneficiaries and in Public Buildings in Districts with other infrastructure development projects from adjacent areas, and no

other cumulative environmental and social aspects that could have a negative impact on the community and the environment in the construction area are identified. If cumulative impacts are identified, they will be considered in the assessment of E&S risks to be carried out in the context of each subproject. The overall project interventions, as finally expected, will: improve the technical capacity of the beneficiaries and increase energy efficiency in public buildings and the district heating system, reduce technological losses and ensure better control of natural resources use and pollutant emissions.

#### **4.2.3 Risks and Mitigation Measures Specific to Disadvantaged and Vulnerable Groups**

Considering the planned investment under the MEERM project, the groups of people can be considered disadvantaged or vulnerable during the implementation of Component 2.

The following groups were identified as potentially vulnerable under Component 2:

- Public building users with severe physical and sensory disabilities or other special needs
- GBV shelters beneficiaries
- Medical Centers serve users, particularly Persons with Disabilities or other special needs, or the elderly
- Low-income families/extreme poor and especially female-headed households.
- Roma communities.
- Ukrainian refugees
- Children beneficiaries of Temporary Placement Centers
- Public building workers with disabilities or special needs.
- Illiterate community population
- Population of ethnic minorities

The vulnerabilities of these groups can be caused by the incapacity or the limited possibilities to have access to the information on Project's activities and its potential risks and implications, such as noise, dust vibration, exposure to hazardous materials, and temporary access restriction during the works, of the risks to be affected by temporary disruption, suspension or relocation of services

For some of such groups, particularly users of health institutions, temporary placement centers, or GBV shelters, will be disproportionately affected by risks to be affected by temporary disruption, suspension, or relocation of services. The project will not finance work in buildings requiring the physical relocation of shelter or temporary placement center residents.

Another risks might be in lack of interest in Project's related information, and which can lead to ignoring important information for health and safety.

Where financially and technically feasible, the design and construction of social infrastructure objects must be adapted to the needs of people with disabilities. Persons with disabilities may also be more likely to be affected by access restrictions or changes in pedestrian circulation, where proposed temporary arrangements may not be accessible. Temporary arrangements during construction within the project will consider the needs of persons with disabilities.

The responsible authorities have the obligation to authorize the operation of objects of public utility only under conditions that ensure compliance with the relevant regulations, thereby providing people with disabilities unrestricted access to them.<sup>16</sup>

The vulnerabilities of these groups can be caused by the incapacity or the limited possibilities to have access to the information on Project's activities and its potential risks and implications, such as noise, dust vibration, exposure to hazardous materials and temporary access restriction during the works, of the risks to be affected by temporary disruption, suspension or relocation of services.

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<sup>16</sup> Art 18 Law Regarding the social inclusion of persons with disabilities in the Republic of Moldova with changes 2024 year №60 of 30.03.2013

The strategy for information and engagement of the vulnerable groups are described in the SEP, including the engagement of relevant institutions, authorities and NGOs that can support the information provision to the vulnerable groups and to support the implementation entities in work with these groups during the Project implementation.

Communication materials can be adapted to the needs of persons with different types of disabilities. This can be determined in the context of each subproject where necessary.

The implementation entities will ensure continuous information provisions and engagement using the various channels and methods, including school open days, trainings, internships program etc.

#### **4.2.4 Potential Impacts during the Operation Stage**

During the operational phase of retrofitted facilities impacts on the air quality are not expected if the heating system is properly installed and energy efficient. Taking in consideration that the adapted facility will be provided with thermal insulation, new windows and door(s), the loss of energy and the consequent need for heating will be minimized, which will lead to decreased fuels consumption and minimization of the impact on air quality.

If the heating system in retrofitted facilities uses oil as fuel, regular maintenance of the installed boiler should be envisaged according to the previously prepared Plan for maintenance of the equipment, in order to minimize emissions of exhaust gases from the combustion of oil fuel. However, in case if the sub-project proposes replacement of old fossil fuel heating system, it shall be replaced only with renewable energy sourced system; natural gas is also accepted as eligible fuel in such case.

During the operational phase, facilities will generate relatively small amounts of urban wastewater, which will be discharged either into the centralized sewage system or treated separately in-situ (in the absence of a centralized sewage system).

At this phase the household waste are expected to be generated, which will also include recyclable waste such as paper, glasses, plastic bottles, lighting bulbs, packaging waste from cleaning products, batteries, electric and electronic equipment, etc. All these wastes shall be managed through contracting specialized licensed communal services for collection, transportation and reuse of packaging waste, waste from electric and electronic equipment, etc. As for the solid (non – hazardous) waste generation, the beneficiaries shall possess signed contracts with municipal communal enterprises for its collection, transportation, and disposal to the landfill. In case the project participant, especially a municipality, possesses a facility for inert waste recycling or may be able to reuse items which are not classified as hazardous waste, it shall be discussed and proposed within the site-specific ESMP.

During the operation stage, it is not expected that the impact on community health and safety. The communities' grievances during the operation stage will be addressed according to the Administrative Code of the Republic of Moldova no.116/2018. The labor condition and OHS aspects will be managed according to the national legislation in force. The SE/HS aspects will be addressed by the beneficiaries according to the Labor Code of the Republic of Moldova no. 154/2003 and Criminal Code of the Republic of Moldova no.985/2002.

## 5 PROCEDURES AND IMPLEMENTATION ARRANGEMENTS

### 5.1 Environmental and Social Risk Management Procedures

The scope of the risk assessment procedure is to determine and assess risks and opportunities that are relevant to the Project’s life cycle associated the project context and needs and expectation of stakeholders.

The risk assessment objectives are the following:

- To identify, evaluate and manage risks and impacts of the project in a manner consistent with the WB’s ESSs 1-10, and applicable national ES laws;
- To adopt a mitigation hierarchy approach to: (a) Anticipate and avoid risks and impacts; (b) Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels; (c) Once risks and impacts have been minimized or reduced, mitigate; and (d) Where significant residual impacts remain, compensate for or offset them, where technically and financially feasible;
- To adopt differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable, and they are not disadvantaged in sharing development benefits and opportunities resulting from the project;
- To utilize national environmental and social institutions, systems, laws, regulations and procedures in the assessment, development and implementation of projects, whenever appropriate;
- To promote improved environmental and social performance, in ways which recognize and enhance Borrower capacity.

In this context, the process of implementation of this ESMF includes the following activities related to the ES risks and impacts identification and management at subprojects levels:

*Table 10. Project Cycle and E&S Management Procedures*

Project Stage	E&S Stage	E&S Management Procedures
<b>a. Assessment and Analysis:</b> Subproject identification	Screening	- During the subproject identification, ensure subproject eligibility by referring to the <b>Exclusion List</b> below. For all activities, use the <b>Screening Form in Annex 1 and Annex 2</b> to identify and assess potential environmental and social risks and impacts, and identify the appropriate mitigation measures for the subproject. - Identify the documentation, permits, and clearances required under the national legislation.
<b>b. Preconstruction and Design:</b> Planning for subproject activities, including human and budgetary resources and monitoring measures	Planning	- Based on <b>Screening Form</b> adopt and/or prepare relevant environmental and social procedures and plans: site specific ESMP for “moderate” ES risk subprojects and site-specific ESMP Checklist for “low” ES risk subprojects. For subprojects requiring Environmental and Social Management Plans (ESMPs), submit the first 5 ESMPs, any ESMPs that require a temporary relocation plan or livelihood restoration plan, and any other ESMP upon the Bank’s request for prior review and no objection by the World Bank prior to initiating bidding processes and/or launching activities All subsequent ESMPs shall be subject to post-review by the Bank if so requested.

		<ul style="list-style-type: none"> <li>- For subprojects requiring ESMP Checklists, submit the first 3 ESMPs for prior review and no objection by the World Bank prior to initiating bidding processes and/or launching activities (for subproject activities not subject to bidding).</li> <li>- For the rest of site-specific ESMPs / ESMP Checklists the WB will only check randomly these during regular missions.</li> <li>- Ensure that the contents of the ESMPs / ESMP Checklists are shared with relevant stakeholders in an accessible manner and consultations are held with the affected communities in accordance with the SEP before the start of the bidding process for works.</li> <li>- Complete all documentation, permits, and clearances required by national legislation.</li> <li>- Train staff responsible for implementation and monitoring of ESMPs.</li> <li>- Incorporate relevant environmental and social procedures and plans into contractor bidding documents; train contractors on relevant procedures and plans.</li> </ul>
<p>c.</p> <p><b>Implementation, Monitoring and Reporting:</b>                  Implementation support and continuous monitoring for projects</p>	<p>Implementation</p>	<ul style="list-style-type: none"> <li>- Ensure implementation of plans through site visits, regular reporting from the field, and other planned monitoring.</li> <li>- Track grievances/beneficiary feedback.</li> </ul> <p>Continuing awareness raising and/or training for relevant staff, contractors, communities, staff of the beneficiary institutions etc.</p> <p>Develop and submit regular reports to the World Bank, the relevant government institutions, and other stakeholders.</p> <p><b>Implementation and immediate correction.</b> Responsible for continuous oversight of ESHS and Labor Performance. The Contractor must maintain <b>daily logs</b> of: OHS inspections and near misses. Non-compliance incidents. Toolbox talks and worker training records. GRM log (worker and community grievances).</p> <p><b>Compliance and Direction.</b> Responsible for verifying the Contractor's ESHS performance and system functionality. The PIU will ensure independent OHS supervision is carried out by qualified OHS experts appointed by the PIU or hired individually or as part of a broader works supervision contract. The PIU will: Conduct <b>regular site visits</b> (weekly, bi-weekly) to confirm the Contractor's OHS monitoring is effective and that OHS supervision is being carried out as adequately. Review the Contractor and OHS supervisor's documentation (site reports, incident logs, GRM logs). Provide <b>corrective instructions</b> and formally address non-compliance issues.</p>

### 5.1.1 Environmental and Social Screening Procedure

The E&S Screening procedure comprises of two stages-process: (1) Initial screening by using the Exclusion List below; and (2) Screening the proposed activities to identify the approach for E&S risk management.

#### **I. Exclusion List:**

As a first step, all proposed activities should be screened to ensure that they are within the boundaries of the Project's eligible activities, and they are not considered as activities listed on the E&S Exclusion List in the table below.

- (i) Sub-project activities in the case they may cause significant impacts for which it would be necessary a full ESIA, according to national Law #86/2014 (Category A with high-risk subprojects);
- (ii) Any activities which would have an irreversible and substantial environmental and social impact and correspond to a World Bank Categories – High Risk or Substantial Risk Projects. Consequently, only Moderate Risk and low Risk projects are eligible for financing under the Project. This means that the Project will not finance activities for which a Full Environmental Impact Assessment is required as per WB ESS 1.
- (iii) Sub-project activities located in protected areas, critical habitats or culturally or socially sensitive areas recognized under national regulations (i.e., on natural areas protected by state, core areas of ecological network, national register of monuments etc.)
- (iv) Any activities that:
  - i Require land acquisition through expropriation or involuntary restriction of land use
  - ii Cause physical displacement of any persons (including individuals residing or temporarily staying on the premises)
  - iii significant economic displacement<sup>17</sup>
- (v) any activities involving forced or child labor, reported or significant concern for sexual exploitation and abuse or sexual harassment
- (vi) Any of the activities listed in the World Bank Group - IFC Exclusion List: <https://www.ifc.org/en/what-we-do/sector-expertise/sustainability/ifc-exclusion-list-2007>
- (vii)

The principle of avoidance usually applies for subprojects that (a) can create significant loss or damage to nationally important physical cultural resources, critical natural habitats, and critical natural forests; (b) require amount of land acquisition, resettlement, and/or loss of assets; and/or (c) classification as substantial or high risks according to WB's ESF risk classification. Such subprojects would not likely be eligible for financing under the Project.

#### **II. Screening:**

As a second step, the CNED will use the E&S Screening Form from *Annex 1 and Annex 2* to identify and assess relevant environmental and social risks specific to the subprojects and identify the appropriate mitigation measures. This screening will be done at the initial stage of the project.

CNED will also identify the documentation, permits, and clearances required under the legislation of Republic of Moldova.

This document will be attached to all submitted subprojects.

As mentioned above, in the case of “low” risk subprojects with small scale EE activities CNED will prepare site-specific ESMP Checklists (as presented in Annex 3) to follow good construction and housekeeping practices

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<sup>17</sup> Minor and reversible impacts on business income, including temporary relocation of the business, is allowed under the project with the application of the mitigation and compensation measures outlined in the ESMF.

along with requirements related to occupational health and safety issues, avoiding all potential environmental impacts. The selected Contractor will have to apply and prepare Contractor's ESMP Checklist for the respective subproject's activities.

In the case of “**moderate**” risk subprojects with more significant impacts including temporary relocation of staff or disruption of services, and /or related to hazardous wastes and materials, CNED will prepare site-specific ESMPs as indicated in Annex 4 for identifying and defining the mitigation measures to be implemented during the EE activities.

The selected Contractor will have to apply and prepare Contractor's ESMP for the respective subproject's activities.

Those subprojects categorized as “**substantial**” or “**high**” risks are not eligible for financing under MEERM Project.

The ESMP/ESMP Checklist will become a part of the bidding documents for construction works contracts, and the required mitigation measures will constitute an integral part of the subproject implementation.

All contractors will be required to use environmentally acceptable technical standards and procedures during carrying out of work. Additionally, contract clauses shall include requirements towards compliance with all national energy efficiency, construction, health protection, safeguard laws and rules as well as on environmental protection.

The ES procedures during the screening, procurement, design, construction and monitoring and reporting and specific institutional and staff responsibilities related these aspects will be included in the Project Operational Manual (POM) and other documents if relevant.

#### **5.1.4 Disclosure and Consultation**

All prepared ES instruments (ESMP checklists or / and site-specific ESMPs) will be published on the websites of CNED and other involved institutions in the Project implementation and on the websites of the beneficiaries. The ES instruments are subject to consultation with the identified stakeholders at subproject level.

#### **5.1.5 Implementation and Monitoring**

Implementation and monitoring are the systematic measurement of how a sub project is performing and is part of the overall supervision of the subproject.

The screening reports during the initial phase will be approved by the WB until sufficient experience will be established at the level of CNED; further, the screening reports for “moderate” or “low” risks subprojects the WB will only check randomly these during regular missions. If the subproject has moderate or low environmental and social concerns, CNED will ensure that all the risk mitigation measures are incorporated in the ES risk management instrument **before starting the procurement process for the works contract(s)**.

The preparation and implementation of ESMPs is expected to cost only a small fraction of total subproject preparation cost, as most mitigation measures will be very generic, off-the-shelf, and implementable without specialized skills, experience or equipment.

The proper and timely implementation of the environmental, social, health and safety mitigation measures will be monitored during the subproject implementation.

Environmental and social monitoring system starts preparation and implementation phases through the operation phase in order to prevent negative impacts of the subproject and observe the effectiveness of mitigation measures. This system helps the WB and CNED to evaluate the success of mitigation as part of project supervision and allows taking an action when needed.

CNED, consulting supervision company/consultant will regularly monitor implementation of this ESMF, both at overall Project level and subprojects level as well as the subprojects during the construction to ensure proper implementation of the ESMP checklist and site-specific ESMP provisions.

The monitoring will be carried out by establishing weekly or bi-weekly working meetings with the contractors, supervision consultants and beneficiaries, if necessary, through regular on-site visits by both the technical supervisors and the CNED.

If any problems in implementation are noted during the monitoring, they will inform the relevant contractor and jointly take the corrective actions.

The Contractors and supervision consultants will report regularly to CNED the ES requirements implementation. Additional information can be requested or discussed with the beneficiary institutions. Environmental and social monitoring to be implemented by the CNED has to provide information about key environmental and social aspects of the subprojects, particularly the environmental and social impacts and the effectiveness of taken mitigation measures.

CNED is also responsible for processing, addressing and monitoring complaints and other feedback, including that on environmental and social issues.

Throughout the Project implementation stage, CNED will continue to provide training and awareness raising to relevant stakeholders, such as staff, selected contractors, and communities, to support the implementation of the environmental and social risk management mitigation measures. An initial list of training needs is proposed below, in Section 5.3.

The supervision process will be complemented by WB supervision of the Project. The WB project team will also visit the subproject sites as part of the project supervision, if appropriate and expedient. The Bank has the right to request additional materials during the monitoring to clarify the state of facilities and risks. Based on the review of reporting documentation and field visits, the Bank may require changes to the risk category and related project documentation, including the ESMP, Project Operational Manual given by the ESMF, etc.

### **Reporting**

Environmental and social activities performance, including monitoring, shall be properly documented and reported. In accordance with national legislation for the facilities under construction/rehabilitation each contractor shall keep a log with information on training for workers and another log for the registration of accidents during construction works. In the case of instrumental monitoring, the original records of the results of the required instrumental environmental/social monitoring shall also be stored in a separate file for records.

### **Documenting outcomes of the environmental and social supervision of subprojects is mandatory.**

CNED will present its findings and monitoring results to the World Bank in the project progress quarterly reports. These reports shall include (i) the overall implementation of E&S risk management instruments and measures per the requirements of the ESCP, (ii) any environmental or social issues arising as a result of project activities and how these issues will be remedied or mitigated, including timelines, (iii) Occupational Health and Safety performance (including incidents and accidents), (iv) community health and safety, (v) stakeholder engagement updates, in line with the SEP, (vi) public notification and communications, (vii) progress on the implementation and completion of project works, and (viii) summary of grievances/beneficiary feedback received, actions taken, and complaints closed out, in line with the SEP.

Monthly monitoring reports will be generated by the contractors and/or supervising consultants for reflecting quality and extent of the application of each environmental and social mitigation measure prescribed by the site-

specific ESMPs/ESMP Checklist. Information provided in the progress reports should be supported with photo material taken on-site and dated.

The Project's progress reports will be submitted regularly (i.e. quarterly) as specified in the Environmental and Social Commitment Plan (ESCP) and Project Operation Manual (POM), starting from the effective date (Effective Date), and shall be submitted as part of the regular project monitoring reports submitted to the Bank throughout the entire period of the Project implementation.

If CNED becomes aware or was informed by contractors or supervision consultant of a serious incident in connection with the project, which may have significant adverse effects on the environment, the affected communities, the public, or workers, it should notify the World Bank within 48 hours of becoming aware of such incident. A fatality is automatically classified as a serious incident, as are incidents of forced or child labor, abuses of community members by project workers (including gender-based violence incidents), violent community protests, or kidnappings. The Operations Manual will include more details about notification procedures and investigation requirements.

### ***5.2 Implementation Arrangements***

**Implementation Entities:** The Ministry of Finance (MoF), as the Borrower of the World Bank loan, will enter into an Implementation agreement with the Ministry of Energy, the central administration authority responsible for the project, which will delegate day-to-day implementation to National Center for Sustainable Energy (CNED).

MoE will play the leading role in implementing the proposed project, while relying on its departments, subdivisions, and subordinated agencies to provide technical support for implementation.

CNED directly responsible to MoE, will act as the lead implementing agency for the project and maintain fiduciary responsibilities for all components and will ensure efficient project implementation in relation to the MoE's obligations on social and environmental standards, procurement, financial management and other country-specific requirements such as monitoring and evaluation.

A new PIU will be created and staffed with project funds. Procurement and contract management for all technical assistance, studies, and works, will be carried out by CNED PIU

CNED will ensure the Project implementation, including monitoring of the implementation of the ESMF, SEP, LPM and GRM.

To ensure compliance with E&S requirements, CNED will hire or appoint qualified environmental and social specialists, per the ESCP.

Overall, the role of the environmental and social specialists include, but are not limited to: (i) provide assistance to the project's beneficiaries and contractors to determine the environmental and social risks and impacts that can be generated by proposed activities supported under the Project as well as prescribe the required mitigation actions to be taken; (ii) conduct screening and ensure that due environmental and social work (ESMP check list and site-specific ESMP) are prepared for the proposed investments; (iii) properly implement the LMPs and SEP, (iii) monitor and report on a regular basis the effects on the environment and on social issues that financed activities may provoke and ensure that mitigation is carried out.

The environmental and social specialists also must regularly and selectively visit subprojects and ensure proper environmental and social monitoring for Project activities.

CNED will include the relevant provisions of the ESMF, including LMP, SEP and GRM in the following documents:

- Project Operations Manual;

- Bidding and procurement documents;
- Construction and supervision contracts for individual subprojects, both in the specification and in the bill of quantities; Contractors will be required to include the cost of implementation of environmental and social activities in their financial proposals;

**Beneficiaries and Contractors.** The planned investments and activities will be carried out by Contractors/Consultants selected through the bidding process. They should operate in full compliance with national environmental and social legislation and with the ESMF and ESMP checklist or site specific ESMPs requirements. Further, the contractors are obliged to follow regulative requirements of the national law and WB’s ESSs and requirements related to traffic safety, occupational health and safety; fire safety; environmental protection; community health and safety and stakeholder engagement. All ES management associated activities will be financed by the contractors. The contractors will also be requested to designate a person in charge of environmental, social, health and safety issues and for implementing this ESMP and site-specific ES instruments. The consolidated roles and responsibilities of a main project stakeholders are presented in *Table 11* below).

In addition, the Contractor will prepare the specific plans that may be required in the ESMP, which may include but are not limited to the following:

1. The Contractor ESMP for the construction works to be carried out - as per requirements and specifications of the ESMP checklist and site-specific ESMP developed at Project level;
2. Own LMPs, including OHS Plan;
3. Traffic Management Plan to be agreed with the local Traffic Police;
4. Emergency and Response Capacity Plan (includes situations of accidental pollution, emergency and first aid equipment, list of useful emergency telephone numbers, etc.);
5. Solid Waste Management Plan, including hazardous wastes.

**Table 11. Implementation Arrangements**

Responsible Party	Responsibilities
World Bank	a) Disclose ESMF, SEP, ESCP on WB’s official website and review and approve any revisions to the documents b) Review: the site-specific ESMPs for first 5 subprojects, ESMPs that include temporary relocation plans or livelihood restoration plans, and site-specific ESMP Checklists for first 3subprojects c) Conduct implementation support and supervision missions in order to ensure that the Project is following WB ESS requirements.

**Moldova Energy Efficiency Revolving Mechanism (MEERM)**  
**Environmental and Social Management Framework**

<p>CNEDs Environmental and Social Specialists</p>	<ul style="list-style-type: none"> <li>a) carry out the commitments in the ESCP, including implementation of the E&amp;S instruments (ESMF, SEP)</li> <li>b) Disclose the ESMF, SEP and ESCP;</li> <li>c) Prepare ESMP checklist and/or site-specific ESMP according to ESMF, Submit ESMPs to the WB for prior review, Perform the quality control and review of ESMP;</li> <li>d) Disclose subproject ES instruments and incorporate ES requirements into bidding documents;</li> <li>e) Environmental and social monitoring in the field;</li> <li>f) Perform inspections of the implementation of the ES instruments by the construction contractor and beneficiaries, make recommendations and decide whether additional measures are needed or not;</li> <li>g) In case of non-compliance, ensure that the contractor eliminates the noncompliance;</li> <li>h) Hold consultation meetings, and prepare and distribute leaflets or other informative documents to inform communities, on Project, and its impacts and construction schedule;</li> <li>i) Set up a GRM, monitor and address grievances related to the project under specified timelines;</li> <li>j) Manage the grievance redress mechanism, including the grievances received from project workers;</li> <li>k) Provide guidance to the construction contractor and engineering supervision firm;</li> <li>l) Summarize the environmental and social issues related to project implementation to WB in regular progress reports;</li> <li>m) Be open to comments from affected groups and local environmental authorities regarding environmental aspects of project implementation. Meet with these groups during site visits, as necessary;</li> <li>n) Coordinate and liaise with WB supervision missions regarding; environmental and social safeguard aspects of project implementation.</li> <li>d) To ensure the public disclosure of the draft and final site-specific ESMP and, where necessary, the Temporary Relocation Plan (TRP), to affected communities and relevant stakeholders (e.g., institution management, parents, medical staff) in an accessible format and location</li> </ul>
<p>Beneficiary institutions / Management of the public buildings</p>	<ul style="list-style-type: none"> <li>a) Disclose the subproject documents on their websites and place summary information notes on their information boards;</li> <li>b) Provide Technical data to CNED for preparing bidding document;</li> <li>c) Provide Technical data for Contractor to prepare detailed design;</li> <li>d) Conduct with Contractor and State Authorities (environment, sanitary and firefighting representatives) inspection on construction locations;</li> <li>e) Attend at public consultation and provide information to all interested parties;</li> <li>f) Support GRM at local / subproject level and reporting to CNED</li> <li>g) Be open to comments from affected groups and local environmental authorities regarding environmental aspects of project implementation;</li> <li>h) Collaborate with CNED in monitoring and reporting the Project performance and progress.</li> </ul>
<p>Contractors</p>	<ul style="list-style-type: none"> <li>a) Develop for Contractor ESMP and LMP, TMP, etc.</li> <li>b) Implement ES requirements on site;</li> <li>c) Implement LMPs;</li> <li>d) Monitor site activities on a regular basis (daily, weekly monthly etc.);</li> <li>e) Prepare the ES progress reports for the review of CNED, including GRM at subproject level and grievances for workers</li> </ul>

<p>Construction Engineer/Consultant</p>	<p>Supervision</p> <ul style="list-style-type: none"> <li>a) Supervising and monitoring of all contract provisions that must be ensured and respected;</li> <li>b) Providing an oral or written instruction to the Contractor;</li> <li>c) Controlling and checking of compliance with the instructions given on any matter related to the Contract;</li> <li>d) Checks compliant to the Standard conditions of contract, alongside other routine activities, shall supervise the Contractor’s Environmental and Social performance and verify compliance with E&amp;S Instruments.</li> <li>e) Issuing to the Contractor (at any time) instructions and additional or modified Drawings which may be necessary for the execution of the Works and the remedying of any defects, all in accordance with the Contract;</li> <li>f) Performing regular site visits on construction sites and preparing conformity reports, including ES aspects, etc</li> <li>g) Prepare the ES progress reports for the review of CNED, including GRM operation.</li> <li>h) Explicitly is responsible for the oversight and enforcement of all <b>OHS</b> standards on-site. This includes ensuring contractor compliance with the ESMP and all relevant safety protocols throughout the duration of the works.</li> </ul>
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**5.3 Proposed Training and Capacity Building**

Successful implementation of the Project will depend, among others, on the effective implementation of the environmental and social risk management measures outlined in this ESMF. Training and capacity building will be necessary for the key stakeholders in order to ensure effective implementation of the ESMF, LMPs, SEP, ESCP and other environmental and social documents. To the extent possible, training on environmental and social risk management will be integrated into the project cycle and operational procedures. Given the need to raise awareness among project workers and stakeholders at many levels, a cascading model is proposed where information will follow from the national level to the field levels. An initial training approach is outlined in the table below.

**Table 12. Proposed Training and Capacity Building Approach**

Level	Responsible Party	Audience	Topics/Themes that May Be Covered
<p><b>National level</b></p>	<p>World Bank</p>	<p>Staff responsible for overall implementation of ESMF</p>	<p>ESMF and approach:</p> <ul style="list-style-type: none"> <li>- Identification and assessment of E&amp;S risks</li> <li>- Selection and application of relevant E&amp;S risk management measures/instruments</li> <li>- E&amp;S monitoring and reporting</li> <li>- Incident and accident reporting</li> <li>- Application of LMP, including Code of Conduct to be developed and adopted prior to Project implementation, incident reporting, SEA/SH</li> <li>- Application of SEP and the grievance/beneficiary feedback mechanism</li> </ul>

<b>Regional/local level</b>	CNED	Beneficiaries Contractors Management and workers Supervisions Consultants	ESMF and approach: <ul style="list-style-type: none"> <li>- Identification and assessment of E&amp;S risks</li> <li>- Selection and application of relevant E&amp;S risk management measures</li> <li>- E&amp;S monitoring and reporting</li> <li>- Incident and accident reporting</li> <li>- Application of LMP, including Code of Conduct to be developed and adopted prior to start of Project implementation, incident reporting, SEA/SH,</li> <li>- Application of SEP and the grievance/beneficiary feedback mechanism - Workers' grievance redress.</li> </ul>
<b>Community level</b>	Contractors Supervision Consultants	Community members, including staff of the schools and pupils	<ul style="list-style-type: none"> <li>- Basic OHS measures and Personal Protective Equipment</li> <li>- Community health and safety issues</li> <li>- SEA/SH issues, prevention, measures</li> <li>- Grievance redress</li> <li>- Workers' grievance redress</li> </ul>

#### **5.4 Estimated Budget**

The ESMF implementation costs will be covered from the project budget. The environmental and social Specialists, who shall be employed and paid by the PIU/CNED, will ensure that management is informed about the required budget for all activity-specific mitigation measures that may be required in compliance with the ESMF.

The project manager at PIU/CNED will oversee the ESMF implementation, with relevant support rendered by supervision and social and environmental safeguards consultants. The budget for conducting the site-specific E&S mitigation measures and the costs of obtaining clearances or permits shall be included under the project's direct budget and/or contracts under relevant project components

The budget for capacity building on ESMF implementation, travel costs, and workshops and meetings for safeguards monitoring is included in the overall monitoring and evaluation budget under Component 3 of the project.

## **6 STAKEHOLDER ENGAGEMENT, DISCLOSURE, AND CONSULTATIONS**

In accordance with the environmental and social policies of the WB, the Borrower, through MoE CNED, should ensure open dialogue, public consultations, and timely and full access by all stakeholders to information related to the Project's activities.

A separate SEP for the Project has been prepared and discussed with the relevant stakeholders, based on the World Bank's Environmental and Social Standard 10 on Stakeholder Engagement. Stakeholder engagement process specific for the Project's life cycle will ensure transparent and inclusive Project implementation in order to improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

The SEP identify the Project-affected parties (PAP) and other interested parties of all Project's components, described the information and engagement tools and methods which should be used by the implementation

entities such as public consultation, group meetings, workshops, leaflets, information boards, letters, emails, websites, reports and a specific Grievance Redress Mechanism at Project level.

Also, the SEP defines clear roles, responsibilities and authority specific for the Project's life cycle as well as designate specific personnel to be responsible for the implementation and monitoring of stakeholder engagement activities.

Implementation arrangements for the SEP, including the monitoring of output and outcome results will be the responsibility of MoE and the CNED for each Project's component.

CNED will monitor the SEP implementation in accordance with the requirements of the WB ESF and will ensure the collection of information for regular project reporting. This will include the component output measures on ESF risks and GRM reports.

This ESMF, as well as the SEP and the Environmental and Social Commitment Plan (ESCP) that have been prepared for this project, were sent to relevant stakeholders for the consultation, and will be disclosed on the CNED website where stakeholders will be able to submit additional feedback.  
<https://cned.gov.md/ro/content/super-esco>

### **ESMF Disclosure**

All interested parties have been invited to submit virtually their comments and questions to CNED.

The information notes on the Project description and potentially environmental and social impacts, summary of ESMF and announcement on public consultation were submitted to all institution that will participate in the Project implementation, other governmental and potential beneficiary institutions.

### **ESMF Consultations**

The public consultations shall include series of events, including the Public Consultation Event of ESMF and SEP, organized by CNED on December 17, 2025 within the Ministry of Energy premises.

The event was organized in a hybrid format with combined physical and online participation of the participants. In total, **38 participants (16 in room and 22 online) attended the event**. The profile of participants included representatives of central public authorities and line ministries (Ministry of Energy, Ministry of Social Protection and Labour, Ministry of Economic Development and Digitalization, Ministry of Health, Ministry of Energy, Ministry of Environment, National social insurance house (CNAS) General Inspectorate of Police of the Ministry of Internal Affairs, General Inspectorate for Emergency Situations – (IGSU), Environmental Agency, Chamber of Industry and Commerce of Moldova, Trade Union Association, Moldova Energy Projects Implementation Unit (MEPIU), representatives of the Central Public building administration, energy experts.

Participants were familiarized with the Environmental and Social Management Framework (ESMF) which outlined major potential environmental and social risks and impacts associated with the project and proposed corresponding mitigation measures.

At the outset, the general World Bank Environment and Social Framework (ESF), along with the relevant Environmental and Social Standard (ESS) and applicable legal and regulatory frameworks pertinent to the project, were presented to the participants. It was also explicitly noted that the overall environmental and social risks of the project have been assessed as *Low to Moderate*.

Detailed information on the anticipated risks and the mitigation strategies proposed under the project was presented and brought to the attention of the participants. Subsequently, the importance of stakeholder engagement, reflected within the Stakeholder Engagement Plan was highlighted, with particular emphasis on the project's focus on specific project affected parties, other interested groups and vulnerable categories of stakeholders.

The presentation concluded with an overview of the Grievance Redress Mechanism, which CNED will manage in its capacity as the project's implementing institution.

Participants have noticed that the criteria for buildings selection, the expected EE investments were clear and that the specific measures for each subproject will be determined based on professional energy audits and designs. In addition it was suggested to include in ESMF more details of climate change adaptation aspects related to envisaged project activities and integrate as well management of mercury containing waste. Annex 10 contains the report on public consultations.

## **7 GRIEVANCE REDRESS MECHANISM**

In compliance with the World Bank's ESS10 requirement, a specific grievance mechanism will be set-up for the project before Project effectiveness. Dedicated communication materials (GRM pamphlets, posters) will be created to help local residents familiarize themselves with the grievance redress channels and procedures.

Addressing grievances raised by individuals/groups/entities affected by WB-funded Projects is an important component of managing Project risks. A GRM can serve as an effective tool for early identification, assessment and resolution of grievances and therefore for strengthening accountability to beneficiaries. The GRM serves as an important feedback mechanism that can improve Project impact and mitigate the risks. The GRM mechanism will be available to Project stakeholders and other affected parties, enabling them to submit questions, comments, suggestions and/or complaints and provide any form of feedback on all Project-funded activities.

### **8.1. Definition of GRM**

For the purposes of this SEP, a Grievance Redress Mechanism is a process for receiving, evaluating, and addressing project-related grievances from Project affected parties and other interested parties at the level of the project.

The term "Grievance" within the implementation of this Project, is defined as any type of feedback, such as requests, proposals, dissatisfactions, complaints, issues, concerns, suggestions, queries sent by the Project's stakeholders.

### **8.2. GRM scope and use**

*Scope:* The Grievance Redress Mechanism under MEERM project will be available for project stakeholders and other interested parties to submit questions, comments, suggestions and/or complaints, or provide any form of feedback on all project-funded activities.

*GRM's users:* Project beneficiaries, project workers, identified project affected parties, as well as the broader citizens can use the GRM related to project activities.

*GRM's management:* The GRM for MEERM Project will be managed by the CNED.

### **8.3. Procedures - Grievance Resolution Framework**

#### **8.3.1. Grievances submission**

Project Level: The Project's stakeholders can submit any type of feedback related to all Project's activities, including complaints, to CNED, using the following channels:

National Center for Sustainable Energy (CNED)
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Chişinău, str. Albişoara 38, et. 4, MD-2005, Republica Moldova  
Phone 0-8005-5005  
[office@cned.gov.md](mailto:office@cned.gov.md)

Verbal complaints addressed to Project staff could be recorded in writing by the receiver

Within CNED, the Operational Procedure on the Functioning of the **Institutional Information Line** of the Public Institution National Center for Sustainable Energy has been approved by order of the Director. This Procedure regulates the organization, functioning, and control of the institutional information line, established to ensure transparency of the institution's activities and interaction with citizens and beneficiaries of the Programs implemented by the CNED.

The purpose of the Procedure is to ensure accurate and transparent information for citizens and beneficiaries of the Programs implemented by the CNED.

Subprojects/sub-activity level: The any type of feedback related to implementation can be submitted to management of public buildings or to persons to be appointed by the managers to be responsible for the implementation of the activity.

The Contractors that carry out the work will receive and solve the grievances related to works only. The contractor will guide the stakeholders to submit the other type of grievances to institution management. The Contractors will inform weekly CNED on received and solved grievances.

The GRM procedure will be updated based on data provided by management of the beneficiary public buildings for every subproject, including the appointed person for GRM management at subproject level, available communication channels with institution workers, users and other affected parts

Grievances may be submitted anonymously using the dedicated phone numbers or email.

All anonymous grievances and complaints should be addressed and recorded as well as other grievances and complainants, Confidentiality must be ensured in all cases, including the case when the person submitting the appeal chooses anonymity.

### *SEA/SH Complaints*

The Project treats sensitive and confidential complaints, including those related to Sexual Exploitation and Abuse/Harassment (SEA/SH) in line with the WB ESF Good Practice Note on SEA/SH.<sup>18</sup> For GBV, and particularly for SEA/ SH complaints, there are risks of stigmatization, rejection and reprisals against survivors.

Taking into account the standards regarding the prevention of SEA/SH, which, in accordance with the requirements of the World Bank, must be observed in all projects financed by the World Bank, these standards will be observed, and responsibilities take action to raise awareness on the prevention and suppression of SEA/SH and operate a GRM employing a survivor-centric approach. The Project staff and contractors will be informed of SEA/SH prevention and oversight principles, including confidentiality and obtaining consent from the survivor for reporting complaints, at all stages of the Project implementation.

When receiving SEA/SH related complaints, the person receiving the complaint should not ask for or record any information beyond the following aspects:

- the nature of the allegation—what a survivor says in his or her own words without direct questioning;

- if, to the best of the survivor's knowledge, the perpetrator is associated with the project;
- when possible, the age and sex of the survivor; and
- when possible, information about whether the survivor was referred to services.

The person to whom the SEA/SH allegation is disclosed requests the consent of the survivor to share some nonidentifiable data with the implementing agency and the World Bank regarding the type of incident, if the alleged perpetrator is associated with the project, the age and sex of the survivor (if available), and whether the survivor was referred to services. In the absence of consent, there should be absolutely no data sharing, in line with the principle of survivor-centricity. If a survivor gives consent, the SEA/SH allegation recipient reports the anonymized SEA/SH incident as soon as it becomes known to CNED, who will in turn inform the World Bank. The following key pieces of data must be shared: (1) the nature of the allegation; (2) if the alleged perpetrator is, to the survivor's best knowledge, associated with the project (yes/no); (3) the survivor's age and/or sex (if available); and, (4) if the survivor was referred to services.

The person receiving the complaint acknowledges receipt of the grievance and provides honest, clear, and complete information about services available from the various agencies that may be able to assist the survivor, as well as details on how to access them. Survivors should be given adequate information to provide informed consent and should understand that they have the right to place limitations on the type of information they want shared and to specify which organizations can and cannot be given the information. The survivor's consent must be documented. Ultimately, it is up to the survivor, and only the survivor, whether to take up the proposed referrals.

We use this SEP to provide contacts where to receive support:

- SEA/SH green-line 0 8008 8008. This is a green line for women and girls suffering from domestic abuse, victims of trafficking in human beings, victims of sexual exploitation.
- Specialized counseling for victims of domestic violence 0 8008 0000 022 811 999 / 068855050 (Women's Law Center)

The list of GBV service providers/ specialized Human Rights NGOs is available <https://sdvmd.net> . and at <https://anpcv.gov.md/ro/asistenta.html>

The Grievance from persons with disabilities will be identified and addressed as a part of the project GRM.

- emergency line 112 service also will redirect all calls coming from women-victims of domestic violence to the Trust line for Women and Girls, in the cases when the beneficiary refuses police intervention or is in a state of crisis and requires emotional support and psychological counselling. The redirection will also happen when the beneficiaries will need information about their rights and the services available to them.

The SEA / SH issues will require adoption of certain additional measures:

- Gender sensitivity will be sought in the employment of Social Specialist, who will work at CNED.
- Social specialists will be informed about SEA/SH issues.
- In addition to the socio-cultural characteristics and nonviolent communication ways in the training of workers, SEA/SH will also be on the agenda. Worker training will include the following information on SEA/ SH:
  - Definition of violence against women in national and international documents;
  - Types of violence (physical, sexual, economic, emotional);
  - Legal sanctions;
- CNED personnel will be trained on the SEA/SH grievance mechanism and how to respond to grievances related to SEA/SH

- The grievance mechanism will be accessible and ensure the confidentiality of personal information.
- Information activities will be carried out to inform women about the mechanism and children on additional protection issues and measures.
- The confidentiality principle of the grievance mechanism will be repeated in all information materials.
- The GRM will include special measures for child protection given that activities may take place in school environments.

The Project will utilize additional mitigation measures proportional to risk. The contractor will be responsible for developing the workforce management procedure, occupational health and safety plans as well as SEA/SH protocols which will apply to their own and subcontractors' employees who work on the Project. These procedures and plans will be submitted to CNED for review and approval before the contractors are authorized to mobilize to the construction site. All contractors will be required in the contract to commit against the use of child and forced labor, introduce mitigation measures against SEA/SH, and CNED staff in charge of contractor supervision will monitor and report the absence of forced labor and cases of SEA/SH. All personal data and complaints received by the GRM will be treated in a confidential manner unless the complainants consent to the disclosure of their personal information. Especially, the confidentiality of sensitive issues and complaints related to SEA/SH raised by communities will be followed.

#### *World Bank's corporate Grievance Redress Service*

The Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel, which determines whether harm occurred, or could occur, as a result of WB noncompliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit [www.inspectionpanel.org](http://www.inspectionpanel.org).

#### *8.3.2. Grievances receipt and recording*

The person receiving the grievance will complete a grievance form (*see Annex I*) and will record the grievance in the Grievance Tracking Register, kept under MEERM.

CNED's Social Specialist will have the responsibility to record the grievances received at Project level and to include in the Project Grievance Tracking Register all Project grievances, including those received at subproject level by managers of public/ administrative buildings and education facilities, and contractors and supervision consultants. The appointed persons by the beneficiary institutions, Contractor and supervision consultants at subproject level will have the responsibility to manage the grievances, including their reception, recording and monitorization of the resolution.

The Social Specialist will inform the CNED's director on every received grievance both at Project level and subproject level (based on information reported by beneficiary institutions, contractors and consultants) and will agree together the proposed action and measures if necessary, and on other team's members or institutions to be involved in order to solve the grievance and to respond to the complainant/ applicant.

#### *8.3.3. Acknowledgement and follow-up.*

Once the investigation process has been established, the Social Specialist/ appointed persons enters this data into the Grievance Tracking Register and informs the complainant that his/her grievance was received, and the timeframe expected for the response. The information provided to complainant would also include, if required,

the likely procedure if complaints had to be escalated outside the CNED and the estimated timeline for each stage

The number and type of suggestions and questions should also be recorded and reported so that they can be analyzed to improve project communications. Once a month, the Social Specialist should submit to CNED's Director a list of all complaints received, at Project and subproject level, the follow-up required, and the status of complaints from the previous month ("on-going" or "addressed").

#### *8.3.4. Grievance Closure*

The timeline for response to a grievance will not exceed 14 working days. The term can be justified extended up to 20 working days (the complainant will be informed about extension).

A grievance will be "closed" when a resolution satisfactory to all parties has been reached. In certain situations, however, it is possible to "close" a grievance even if the complainant is not satisfied with the outcome. This could be the case, for example, if the complainant is unable to substantiate a grievance, or if there is an obvious speculative or fraudulent attempt. In such situations, the efforts to investigate the complaint and to arrive at a conclusion will be well documented and the complainant will be advised of the situation.

If the complainant is not satisfied by the response or the proposed solution, he/she may appeal to court. The results of investigation and the proposed response to the complainant will be presented for approval to CNED's director. Once a decision has been made and the complainant informed, the social specialist / appointed persons describe the actions to be taken in the grievance form (see Annex 1), along with the details of the investigation and the findings.

*The answers to the anonymous grievances will be placed on CNED's website and on information boards at subproject level.*

#### *8.3.4. Monitoring and Reporting*

Monitoring refers to the process of tracking grievances and assessing the progression toward resolution. CNED will develop and maintaining a grievance register and maintain records of all steps taken to resolve grievances or otherwise respond to feedback and questions.

CNED will monitor grievances routinely as part of the broader management of the Project. This entails good record keeping of the grievances raised throughout the life of the Project.

All involved parties / appointed persons at subprojects level will direct all grievances to CNED and their resolution status if it was decided to solve these grievances at subproject level. The grievances that cannot be solved at subproject level by appointed persons, will be taken over by CNED for subsequent resolution.

CNED's Social Specialist will compile the information provided from subprojects and will develop quarterly reports to Project's management and to the World Bank.

When receiving feedback, including grievances, the following is defined:

- Type of appeal;
- Category of appeal;
- People responsible for the execution of the appeal;
- Deadline of resolving the appeal;
- Agreed action plan.
- These grievance reports will be developed based on Grievance Recording, Grievance Tracking Registers and results of other consultation and engagement activities and will include:

- The number of grievances logged in the proceeding period by level (at project or subproject level) and category and type.
- The number of the solved grievances, including the answers provided to the questions, requests for information, suggestions and proposals and other received feedback through the Project's GRM.
- The number of the grievances under examination.
- The number of the grievances with the accepted resolution.
- The number of the grievances with the partially accepted resolution.
- The number of the grievances with the not accepted / rejected resolution.
- The most frequent questions and requests/suggestion/proposals or feedback.
- The planned or carried out actions and measures based on received feedback, such as for example: informational materials development on specific subjects, additional information provided using the social media channels and, groups meetings or workshop with a specific stakeholders group etc.

This GRM can be revised and updated based on the proposals, comments and suggestions received both from the participants in the GRM operation and Project's beneficiaries and stakeholders.

### **Grievance Mechanism for Project's Workers**

A grievance Mechanism for Project's workers will be established under the MEERM project according to the provision of the World Bank's ESS2. The objective of this procedure is to settle the grievance between an employer and employee or between employees bilaterally before the intervention of a formal court, except in cases where the grievance constitutes a criminal offense that requires notifying law enforcement. Under the provisions of ESS2, the project will provide a grievance mechanism for all direct and contracted workers to raise workplace concerns. Workers will be informed of this grievance mechanism at the time of recruitment and the measures put in place to protect them from any reprisal for its use. The project will put in place measures to make the worker grievance mechanism easily accessible to all project workers.

The Contractors should consider streamlined procedures to address specific worker grievances, which would allow workers to quickly report labor issues, such as a lack of PPE, lack of proper procedures or unreasonable overtime, and allow the project to respond and take necessary action. The CNED's social specialist and environmental, health and safety specialist will also provide overall implementation and capacity building support on resolving all workers grievances. They will also include workers grievance status in the progress report.

The Grievance Mechanism for Project's workers are detailed in the Labor Management Procedures prepared for the Project.

### **World Bank's corporate Grievance Redress Service**

The Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel, which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress> service.

For information on how to submit complaints to the World Bank Inspection Panel, please visit [www.inspectionpanel.org](http://www.inspectionpanel.org).

**ANNEXES**

**Annex 1: Environmental Screening Checklist**  
**ENVIRONMENTAL SCREENING CHECKLIST**

**Part 1**

1. **Project Name:**
2. **Brief Description of sub-project** to include: nature of the project, project cost, physical size, site area, location, property ownership, existence of on-going operations, plans for expansion or new construction.
3. **Will the project have impacts on the environmental parameters** listed below during the construction or operational phases? Indicate, with a check, during which phase impacts will occur and whether mitigation measures are required.

<b>Environmental Component</b>	<b>Construction Phase</b>	<b>Operational Phase</b>	<b>Mitigation Measures</b>
<b>Terrestrial environment</b>			
<b>Construction Waste &amp; Debris:</b> Will the rehabilitation generate significant quantities of non-hazardous construction and demolition waste (e.g., old windows, roofing, plaster)?			
<b>Construction Waste &amp; Debris:</b> Is there a risk of encountering hazardous materials such as asbestos-containing materials (ACM) or lead-based paint during demolition or stripping?			
<b>Hazardous Electronic &amp; Chemical Waste:</b> Will the subproject involve decommissioning and replacing old energy equipment that contains hazardous substances (e.g., mercury in fluorescent tubes, PCB in old transformers, or refrigerants in cooling systems)?			
<b>Long-term Waste (Solar PV/Batteries):</b> Will the project install components that require specialized disposal at the end of their life cycle (e.g., Solar PV panels or Lithium-ion battery storage)?			
<b>Air Quality:</b> Will the construction activities (drilling, hammering, site transport) lead to a temporary increase in dust and vehicle emissions in the immediate vicinity of the building?			
<b>Noise and Vibration (Construction):</b> Will the use of heavy machinery or power tools create noise levels that exceed local standards or disturb building occupants ?			
<b>Acoustic Impact (Operational):</b> Will the installation of new technologies (e.g., air-source heat pumps) generate constant low-frequency noise or vibrations that could disturb the comfort of occupants or neighboring properties?			
<b>Visual and Glare Impacts:</b> Could the installation of rooftop Solar PV panels cause glare or light reflection that impacts the safety of nearby traffic or the visual comfort of residents in taller neighboring buildings?			

**Moldova Energy Efficiency Revolving Mechanism (MEERM)**

***Environmental and Social Management Framework***

<b>Protection of Cultural Heritage:</b> Is the building listed as a local or national architectural monument, or is it located within a historically sensitive zone? Will the energy efficiency measures (e.g., external thermal insulation, changing window frames) alter the original architectural features or heritage character of the building facade?			
Land & soil degradation: Will the project involve land excavation?			
Generation of solid wastes, including toxic wastes?			
Biodiversity and Habitats Loss: Will the project located in vicinity of protected areas or other sensitive areas supporting important habitats of natural fauna and flora?			
Land degradation, water pollution & aesthetics: Construction			
Other impacts			
<b>Air quality</b>			
Will the project provide pollutant emissions?			
Will the project generate specific air pollution (dioxins, furans, etc.)			
<b>Aquatic environment</b>			
Water Quantity: will the project involve water use?			
Water Quality / Pollution: Will the project contribute to surface water pollution			
<b>Environmental Component</b>	<b>Construction Phase</b>	<b>Operational Phase</b>	<b>Mitigation Measures</b>
Loss of Biodiversity: Will the project located in vicinity of protected area or wetlands supporting both local avifauna and birds on passage?			
Other impacts			

4. For the environmental components indicated above, and using the information provided in the *table* below describe the mitigation measures that will be included during the construction (C) or operational (O) phase of the project or both (B)

Environmental Component	Phase (C, O or B)	Mitigation Measures

5. **Examples of Mitigation Measures** (for more detailed description of listed below and other potential mitigation measures

Environmental Component	Mitigation Measures
<b>Construction Waste &amp; Debris:</b> Generation of solid wastes, including toxic wastes?	<ul style="list-style-type: none"> <li>Avoiding unauthorized dumping by implementing a strict Construction Waste Management Plan and designating specific areas for temporary storage and segregation of non-hazardous materials.</li> </ul>
<b>Construction Waste &amp; Debris:</b> Will the rehabilitation generate significant quantities of non-hazardous construction and demolition waste (e.g., old windows, roofing, plaster)?	

**Moldova Energy Efficiency Revolving Mechanism (MEERM)**

**Environmental and Social Management Framework**

<p><b>Construction Waste &amp; Debris:</b> Is there a risk of encountering hazardous materials such as asbestos-containing materials (ACM) or lead-based paint during demolition or stripping?</p>	<ul style="list-style-type: none"> <li>• Minimize the release of hazardous fibers/particles by conducting mandatory pre-demolition screening for Asbestos and Lead-Based Paint; use specialized licensed contractors for removal and secure, sealed transport.</li> </ul>
<p><b>Hazardous Electronic &amp; Chemical Waste:</b> Will the subproject involve decommissioning and replacing old energy equipment that contains hazardous substances (e.g., mercury in fluorescent tubes, PCB in old transformers, or refrigerants in cooling systems)?</p>	<ul style="list-style-type: none"> <li>• Ensure safe decommissioning of old energy equipment by inventorying mercury-containing tubes, PCBs, and refrigerants; maximize the use of certified e-waste recyclers for final disposal.</li> </ul>
<p><b>Long-term Waste (Solar PV/Batteries):</b> Will the project install components that require specialized disposal at the end of their life cycle (e.g., Solar PV panels or Lithium-ion battery storage)?</p>	<ul style="list-style-type: none"> <li>• Implement long-term sustainability through "take-back" clauses in procurement contracts for Solar PV panels and lithium batteries to ensure producer responsibility at the end of their life cycle.</li> </ul>
<p><b>Visual and Glare Impacts:</b> Could the installation of rooftop Solar PV panels cause glare or light reflection that impacts the safety of nearby traffic or the visual comfort of residents in taller neighboring buildings?</p>	<ul style="list-style-type: none"> <li>• Avoiding significant glare impacts by conducting a Solar Glare Hazard Analysis during the design phase to identify potential reflection angles that could affect drivers on adjacent roads or residents in taller neighboring buildings.</li> <li>• Minimize light reflection and visual discomfort by specifying the use of anti-reflective (AR) coated glass or textured glass surfaces for all rooftop Solar PV modules, which increases light absorption and reduces outward glare.</li> <li>• Mitigate direct lines of sight to reflective surfaces by adjusting the tilt and azimuth (orientation) of the panels or, where necessary, installing physical screening/parapets that block the reflection path without shading the panels.</li> <li>• Ensure community safety and comfort by establishing a Grievance Redress Mechanism (GRM) to allow neighbors to report unforeseen glare issues post-installation, triggering a technical review and corrective adjustments.</li> </ul>
<p><b>Protection of Cultural Heritage:</b> Is the building listed as a local or national architectural monument, or is it located within a historically sensitive zone? Will the energy efficiency measures (e.g., external thermal insulation, changing window frames) alter the original architectural features or heritage character of the building facade?</p>	<ul style="list-style-type: none"> <li>• Avoiding visual discomfort and traffic hazards by using anti-reflective (AR) coated glass for Solar PV panels and adjusting panel orientation based on a glare study.</li> <li>• Minimize impact on the heritage character of historic buildings by avoiding external insulation where it hides architectural details; maximize the use of internal insulation or heritage-matched window frames.</li> <li>• Ensure compliance with cultural regulations by obtaining mandatory approvals from the National Council of Historical Monuments before any modifications to listed buildings.</li> </ul>
<p><b>Land &amp; soil degradation:</b> Will the project involve land excavation?</p>	<ul style="list-style-type: none"> <li>• Avoiding unnecessary land disturbance by restricting excavation strictly to the footprint required for the technical installation and avoiding the use of heavy machinery on unpaved or sensitive soil areas during wet weather to prevent compaction.</li> <li>• Minimize soil erosion and loss of topsoil by stripping and stockpiling the organic soil layer separately from subsoil; ensure stockpiles are covered or protected by silt fences to prevent runoff into local drainage systems.</li> </ul>

**Moldova Energy Efficiency Revolving Mechanism (MEERM)**

**Environmental and Social Management Framework**

	<ul style="list-style-type: none"> <li>• Mitigate the risk of sub-surface contamination by ensuring all excavation machinery is in good working order with no oil leaks and providing "spill kits" on-site to immediately treat any accidental chemical or fuel discharges.</li> <li>• Ensure proper site restoration by backfilling excavations with original soil layers in the correct order (subsoil then topsoil) and implementing maximal preservation of vegetation or immediate reseeding/landscaping to stabilize the ground surface post-construction.</li> </ul>
<p><b>Biodiversity and Habitats Loss:</b> Will the project located in vicinity of protected areas or other sensitive areas, nature monuments supporting important habitats of natural fauna and flora?</p>	<ul style="list-style-type: none"> <li>• Avoiding use of remained natural or semi-natural steppe areas for equipment storage or temporary construction camps.</li> </ul>
<p>Land degradation, water pollution &amp; aesthetics: Construction</p>	<ul style="list-style-type: none"> <li>• Avoid, where possible, cutting of trees and other natural vegetation; if unavoidable, implement compensatory planting.</li> <li>• Minimize loss of natural vegetation and ensure maximal preservation of vegetation during construction through the use of protective fencing around tree root zones.</li> <li>• Prevent soil and water contamination by using secondary containment for any chemicals or fuel stored on-site and implementing erosion control measures during excavation.</li> </ul>
<p>Other impacts</p>	
<p><b>Air quality</b></p>	<ul style="list-style-type: none"> <li>• ` Avoiding excessive dust dispersion by using water suppression (spraying) on demolition sites and covering all trucks transporting loose materials.</li> </ul>
<p>Will the project provide pollutant emissions? Will the project generate specific air pollution (dioxins, furans, etc.)</p>	<ul style="list-style-type: none"> <li>• Minimize noise disturbance to building occupants (students, patients) and neighbors by restricting heavy machinery operation to standard daytime hours and maintaining equipment to reduce emissions and rattling.</li> </ul>
<p><b>Air Quality:</b> Will the construction activities (drilling, hammering, site transport) lead to a temporary increase in dust and vehicle emissions in the immediate vicinity of the building?</p>	<ul style="list-style-type: none"> <li>• Mitigate operational noise from Heat Pumps by using vibration-isolation pads, acoustic enclosures, or physical barriers during the installation phase.</li> </ul>
<p><b>Noise and Vibration (Construction):</b> Will the use of heavy machinery or power tools create noise levels that exceed local standards or disturb building occupants ?</p>	
<p><b>Acoustic Impact (Operational):</b> Will the installation of new technologies (e.g., air-source heat pumps) generate constant low-frequency noise or vibrations that could disturb the comfort of occupants or neighboring properties?</p>	<ul style="list-style-type: none"> <li>• Avoiding noise disturbance by selecting equipment (heat pumps, chillers, ventilation units) with the lowest available decibel (dB) ratings and placing them away from sensitive receptors like bedroom windows, classrooms, or neighboring residential boundaries.</li> <li>• Minimize the transmission of structure-borne noise and low-frequency vibrations by installing units on high-efficiency vibration-isolation pads or spring mounts.</li> <li>• Mitigate airborne noise by installing acoustic enclosures, sound-absorbing barriers, or silencers on air intake/exhaust points if noise levels exceed local municipal comfort standards.</li> <li>• Ensure long-term compliance by conducting a post-installation noise level test to verify that the equipment operates within the permitted limits during peak load.</li> </ul>
<p><b>Water Quantity:</b> will the project involve water use?</p>	<ul style="list-style-type: none"> <li>• Avoiding excessive consumption by installing water-efficient fixtures (low-flow faucets, dual-flush toilets) if the</li> </ul>

**Moldova Energy Efficiency Revolving Mechanism (MEERM)**

**Environmental and Social Management Framework**

	<p>subproject involves the renovation of sanitary blocks alongside energy efficiency measures.</p> <ul style="list-style-type: none"> <li>• Minimize water use during the construction phase by implementing closed-loop systems for dust suppression or tool cleaning and strictly monitoring site water meters to detect leaks immediately.</li> <li>• Ensure that any new energy technologies (like specific cooling systems) prioritize dry-cooling or air-sourced methods over water-intensive evaporative cooling to preserve local water resources.</li> </ul>
<p><b>Water Quality / Pollution:</b> Will the project contribute to surface water pollution</p>	<ul style="list-style-type: none"> <li>• Avoiding direct discharge of untreated construction runoff or wastewater into the local sewage system or nearby surface water bodies.</li> <li>• Minimize the risk of chemical pollution by establishing dedicated, banded storage areas for fuels, lubricants, and paints, ensuring that any accidental spill is contained before reaching soil or drains.</li> <li>• Mitigate the impact of sediment-laden runoff by installing silt traps or sedimentation basins for any subproject involving significant earthworks or external trenching.</li> <li>• Ensure safe management of operational fluids by implementing a maintenance protocol for heat pumps to prevent and detect leaks of refrigerants or glycol-based heat transfer fluids that could contaminate groundwater.</li> </ul>
<p><b>Environmental Component</b></p>	<p><b>Mitigation Measures</b></p>
<p><b>Loss of Biodiversity:</b> Will the project be located in the vicinity of protected areas or wetlands supporting both local avifauna and birds on passage?</p>	<ul style="list-style-type: none"> <li>• Avoiding the selection of subprojects located within or immediately adjacent to strictly protected core zones or critical habitats that serve as major nesting or feeding grounds for local and migratory birds.</li> <li>• Minimize habitat fragmentation and disturbance by strictly prohibiting the cutting of trees or removal of established vegetation during the nesting season (typically spring and early summer) to protect local avifauna.</li> <li>• Mitigate the risk of bird collisions with new infrastructure by installing bird-friendly markers or silhouettes on large glass surfaces (if new windows are part of the retrofit) and ensuring that Solar PV panels are installed with non-reflective coatings to prevent "lake effect" illusions that confuse waterbirds.</li> <li>• Maximize the preservation of existing green spaces on the building grounds by implementing protective fencing around tree root zones during construction and ensuring no construction materials or chemicals are stored near natural drainage lines leading to wetlands.</li> <li>• Ensure ecological connectivity by utilizing native plant species for any landscaping or site restoration required after energy efficiency works are completed, supporting local pollinators and urban biodiversity.</li> </ul>
<p>Other impacts</p>	

**Annex 2: Social Screening checklist**

Potential Social Impacts/Risks	Yes	No	Not known	Details
1. Will the subproject intervention include new physical construction work?				
2. Does the subproject intervention include upgrading or rehabilitation of existing physical facilities?				
3. Is the intervention likely to cause any permanent damage to or loss of housing, other assets, resource use?				
4. Does the project involve temporary disruption of services to the public?				
5. Will the project require temporary relocation of building staff or other people?				
6. Will there be temporary loss of incomes for business or loss of employment? This includes instances where early termination of leases or other arrangements are necessary and cause loss of income and employment.				
7. Does the subproject involve potential loss of income or potentially affect social entrepreneurship activities within buildings <sup>19</sup> ?				
8. Will the subproject require labor force for new activities?				
9. Will the subproject require overnight accommodation for construction workers?				
10. Will public buildings workers or users with severe physical and sensory disabilities or other special needs be impacted by sub-project interventions?				
11. Will disadvantaged & vulnerable groups from communities (including socially marginalized communities such as Roma, refugees, elderly, homeless, ethnic minorities) be impacted or benefit by the subproject intervention?				
12. Will the activities of the subproject take place in proximity to women or children (e.g. children playgrounds, green spaces / parks in close vicinity to buildings benefiting of project interventions) or other vulnerable groups, requiring additional mitigation measures?				
13. Will the activities of subprojects be likely to have any issues/risk related to gender-based violence and sexual harassments such as ?				
14. Has the local population or any NGOs expressed concern about the proposed activities?				

Overall assessment of potential impacts and proposed mitigations measures, if any:

<sup>19</sup> Ref: The Law #845/1992 on entrepreneurship activities –[https://www.legis.md/cautare/getResults?doc\\_id=135032&lang=ro](https://www.legis.md/cautare/getResults?doc_id=135032&lang=ro)

**Moldova Energy Efficiency Revolving Mechanism (MEERM)**  
**Environmental and Social Management Framework**

**Annex 3: Site Specific Environmental & Social Management Plan (ESMP) Checklist  
for Construction and Rehabilitation Activities**

**Site Specific ESMP Checklist for Construction and Rehabilitation Activities**

<b>PART 1: INSTITUTIONAL AND ADMINISTRATIVE</b>				
Country/City/Region				
Project title				
Scope of project and activity				
Institutional arrangements (Name and Contacts)	WB Project Team leader	Project Management	Local Counterpart and/or Recipient	
Implementation arrangements (Name and Contacts)	Supervision	Local Counterpart Supervision (if any)	Local Inspectorate Supervision (if any)	Contactor
<b>SITE DESCRIPTION</b>				
Name of site				
Description of site location				
Who owns the land?				
Geographic description				
<b>LEGISLATION</b>				
Identify national legislation & permits that apply to project activity				
<b>PUBLIC CONSULTATIONS</b>				
Identify when / where the public consultation process took place				
Main feedback received and how it was incorporated in the project				

<b>PART 2: ENVIRONMENTAL AND SOCIAL SCREENING</b>			
Will the site activity include/involve any of the following potential issues and/or impacts:	Activity and examples of potential issues and/or impacts	Status If Yes for any	Additional references
	1. Building rehabilitation 2. Site specific vehicular traffic 3. Increase in dust and noise from demolition and/or construction 4. Construction waste	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section <b>B</b> below
	Individual wastewater treatment system 1. Effluent and / or discharges into receiving waters	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section <b>C</b> below
	Historic building(s) and districts 1. Risk of damage to known /unknown historical or archaeological sites	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section <b>D</b> below
		Hazardous or toxic materials - Removal and disposal of toxic and/or hazardous demolition and / or construction waste - Storage of machine oils and lubricants	<input type="checkbox"/> Yes <input type="checkbox"/> No
		Traffic and Pedestrian Safety - Site specific vehicular traffic - Site is in a populated area	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>PART 3: MITIGATION MEASURES</b>			
<b>ACTIVITY</b>	<b>PARAMETER</b>	<b>GOOD PRACTICES MITIGATION MEASURES CHECKLIST</b>	

A. General conditions	Notification and Worker Safety (Labor Code of the Republic of Moldova No. 154-/2003; Law on Safety and Health at Work No. 186/2008)	<ul style="list-style-type: none"> <li>a) The local construction and environment inspectorates and communities have been notified of upcoming activities</li> <li>b) The public has been notified of the works through appropriate notification in the media and/or at publicly accessible sites (including the site of the works)</li> <li>c) All legally required permits (to include not limited to land use, resource use, dumping, sanitary inspection permit) have been acquired for construction and/or rehabilitation</li> <li>d) All work will be carried out in a safe and disciplined manner designed to minimize impacts on neighboring residents and environment.</li> <li>e) Workers' will comply with international good practice (always hardhats, as needed masks and safety glasses, harnesses and safety boots)</li> <li>f) Appropriate signposting of the sites will inform workers of key rules and regulations to follow.</li> </ul>
B. General Rehabilitation and /or Construction Activities	Air Quality (Urban planning & construction Code no. 434/2023: Law on Aer quality no.98/2022)	<ul style="list-style-type: none"> <li>a) During interior demolition use debris-chutes above the first floor</li> <li>b) Keep demolition debris in controlled area and spray with water mist to reduce debris dust</li> <li>c) Suppress dust during pneumatic drilling/wall destruction by ongoing water spraying and/or installing dust screen enclosures at site</li> <li>e) Keep surrounding environment (sidewalks, roads) free of debris to minimize dust</li> <li>f) There will be no open burning of construction / waste material at the site</li> <li>g) There will be no excessive idling of construction vehicles at sites</li> </ul> <p>The debris will be transported in a safety manner and in a covered transport</p>
	Noise	<ul style="list-style-type: none"> <li>a) Construction noise will be limited to restricted times agreed to in the permit</li> <li>b) During operations the engine covers of generators, air compressors and other powered mechanical equipment should be closed, and equipment placed as far away from residential areas as possible</li> </ul>
	Water Quality Law on water no.272/2011)	<ul style="list-style-type: none"> <li>a) The site will establish appropriate erosion and sediment control measures to prevent sediment from moving off site and causing excessive turbidity in nearby streams and rivers</li> </ul>
	Waste management Law on waste no.209/2016	<ul style="list-style-type: none"> <li>a) Waste collection and disposal pathways and sites will be identified for all major waste types expected from demolition and construction activities.</li> <li>b) Mineral construction and demolition wastes will be separated from general refuse, organic, liquid and chemical wastes by on-site sorting and stored in appropriate containers.</li> <li>c) Construction waste will be collected and disposed properly by licensed collectors</li> <li>d) The records of waste disposal will be maintained as proof for proper management as designed.</li> <li>e) Whenever feasible the contractor will reuse and recycle appropriate and viable materials (except asbestos)</li> </ul>
C. Individual wastewater treatment system	Water Quality (Law on water no.272/2011)	<ul style="list-style-type: none"> <li>a) The approach to handling sanitary wastes and wastewater from building sites (installation or reconstruction) must</li> <li>b) be approved by the local authorities</li> </ul> <p>Before being discharged into receiving waters, effluents from individual wastewater systems must be treated in order to meet the minimal quality criteria on wastewater treatment</p> <ul style="list-style-type: none"> <li>c) Monitoring of new wastewater systems (before/after) will be carried out</li> </ul>

**Moldova Energy Efficiency Revolving Mechanism (MEERM)**

**Environmental and Social Management Framework**

D. Historic Buildings	Cultural Heritage Law on the protection of monuments No. 1530/1993	<p>a) If the building is a designated historic structure, very close to such a structure, or located in a designated historic district, notify and obtain approval/permits from local authorities and address all construction activities in line with local and national legislation</p> <p>Ensure that provisions are put in place so that artifacts or other possible “chance finds” encountered in excavation or construction are noted, officials contacted, and works activities delayed or modified to account for such finds.</p>
E. Toxic Materials	Asbestos management	<p>a) If asbestos is located on the project site, mark clearly as hazardous material</p> <p>b) When possible, the asbestos will be appropriately contained and sealed to minimize exposure</p> <p>c) The asbestos prior to removal (if removal is necessary) will be treated with a wetting agent to minimize asbestos dust</p> <p>d) Asbestos will be handled and disposed by skilled &amp; experienced professionals</p> <p>e) If asbestos material is be stored temporarily, the wastes should be securely enclosed inside closed containments and marked appropriately</p> <p>f) The removed asbestos will not be reused.</p>

66

	Toxic / hazardous waste management Law on waste no.209/2016; Law on chemical substances no. 277/2018	<p>a) Temporarily storage on site of all hazardous or toxic substances will be in safe containers labeled with details of composition, properties and handling information</p> <p>The containers of hazardous substances should be placed in and leak-proof container to prevent spillage and leaching</p> <p>c) The wastes are transported by specially licensed carriers and disposed in a licensed facility.</p> <p>d) Paints with toxic ingredients or solvents or lead-based paints will not be used</p>
F. Traffic and Pedestrian Safety	Direct or indirect hazards to public traffic and Pedestrians by construction activities Law on public sanitation services No. 178/2025	<p>a) In compliance with national regulations the contractor will ensure that the construction site is properly secured and construction related traffic regulated. This includes but is not limited to</p> <ul style="list-style-type: none"> <li>- Signposting, warning signs, barriers and traffic diversions: site will be clearly visible and the public warned of all potential hazards</li> <li>- Traffic management system and staff training, especially for site access and near-site heavy traffic. Provision of safe passages and crossings for pedestrians where construction traffic interferes.</li> <li>- Adjustment of working hours to local traffic patterns, e.g., avoiding major transport activities during rush hours or times of livestock movement</li> <li>- Active traffic management by trained and visible staff at the site, if required for safe and convenient passage for the public.</li> </ul> <p>b) Ensuring safe and continuous access to office facilities, shops, and residences during renovation activities, if the buildings stay open for the public.</p>

Social risk management	Labor safety management (Labor Code of the Republic of Moldova No. 154-/2003; Law on Safety and Health at Work No. 186/2008)	Establish a grievance mechanism for workers Developing an emergency procedure to keep under control potential risks, Notification incident investigation, and nonconformity treatment
	Human health, occupational safety (Law on Safety and Health at Work No. 186/2008)	Ensure the use of collective and individual protective measures (such as work clothes, masks, and shoes) when necessary. Conduct regular instruction of personnel on health and occupational safety requirements.

Part 4 Monitoring Plan

<b>Phase</b>	<b>What</b> (Is the parameter to be monitored?)	<b>Where</b> (Is the parameter to be monitored?)	<b>How</b> (Is the parameter to be monitored?)	<b>When</b> (Define the frequency / or continuous?)	<b>Why</b> (Is the parameter being monitored?)	<b>Cost</b> (if not included in project budget)	<b>Who</b> (Is responsible for monitoring?)
During activity <b>preparation</b>							
During activity <b>implementation</b>							

**Moldova Energy Efficiency Revolving Mechanism (MEERM)**  
*Environmental and Social Management Framework*

**Annex 4: Site Specific Environmental & Social Management Plan (ESMP) Content**

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN CONTENT

**Project Name.**

**Brief Description of sub-project**

Includes nature of the project, project cost, physical size, site area, location, property ownership, existence of on-going operations, plans for expansion or new construction.

**Brief E&S Baseline**

Includes a description of the building users, neighboring structure, as well as include any sensitive receptors and vulnerable groups.

**E&S Risk Assessment and Mitigation**

The ESMP identifies measures and actions in accordance with the mitigation hierarchy that reduce potentially adverse environmental and social impacts to acceptable levels. The plan will include compensatory measures, if applicable. Specifically, the ESMP:

- identifies and summarizes all anticipated adverse environmental and social impacts
- describes with technical details each mitigation measure, including the type of impact to which it relates and the conditions under which it is required (e.g., continuously or in the event of contingencies), together with designs, equipment descriptions, and operating procedures, as appropriate;
- estimates any potential environmental and social impacts of these measures; and takes into account, and is consistent with, other mitigation plans required for the project

**Monitoring**

The ESMP identifies monitoring objectives and specifies the type of monitoring, with linkages to the impacts assessed in the environmental and social assessment and the mitigation measures described in the ESMP.

Specifically, the monitoring section of the ESMP provides (a) a specific description, and technical details, of monitoring measures, including the parameters to be measured, methods to be used, sampling locations, frequency of measurements, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective actions; and (b) monitoring and reporting procedures to (i) ensure early detection of conditions that necessitate particular mitigation measures, and (ii) furnish information on the progress and results of mitigation.

**Capacity Development and Training**

To support timely and effective implementation of environmental and social project components and mitigation measures, the ESMP draws on the environmental and social assessment of the existence, role, and capability of responsible parties on site or at the agency and ministry level.

Specifically, the ESMP provides a specific description of institutional arrangements, identifying which party is responsible for carrying out the mitigation and monitoring measures (e.g., for operation, supervision, enforcement, monitoring of implementation, remedial action, financing, reporting, and staff training).

To strengthen environmental and social management capability in the agencies responsible for implementation, the ESMP recommends the establishment or expansion of the parties responsible, the

training of staff and any additional measures that may be necessary to support implementation of mitigation measures and any other recommendations of the environmental and social assessment.

**Monitoring Plan:** Specific parameters to be measured (e.g., noise levels, waste volume), frequency, and thresholds for corrective actions.

**Grievance Redress Mechanism (GRM):** Integration of the project-level GRM to handle complaints from building users or the public.

### **Implementation Schedule and Cost Estimates**

For all three aspects (mitigation, monitoring, and capacity development), the ESMP provides (a) an implementation schedule for measures that must be carried out as part of the project, showing phasing and coordination with overall project implementation plans; and (b) the capital and recurrent cost estimates and sources of funds for implementing the ESMP. These figures are also integrated into the total project cost tables.

### **Integration of ESMP with Project**

The Borrower's decision to proceed with a project, and the Bank's decision to support it, are predicated in part on the expectation that the ESMP (either stand alone or as incorporated into the ESCP) will be executed effectively. Consequently, each of the measures and actions to be implemented will be clearly specified, including the individual mitigation and monitoring measures and actions and the institutional responsibilities relating to each, and the costs of so doing will be integrated into the project's overall planning, design, budget, and implementation.

**Moldova Energy Efficiency Revolving Mechanism (MEERM)**  
***Environmental and Social Management Framework***

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN CONTENT

**Part I - Mitigation plan (Table)**

**Environmental and Social Management Plan Format**

Environmental and Social Elements	Impact	Mitigation Measure(s) <sup>20</sup>	Cost <sup>21</sup>		Institutional Responsibility	
			Install	Operate	Install	Operate
<b>CONSTRUCTION Phase</b>						
<b><i>Environmental Component</i></b>						
Soils						
Water Resources						
Air Quality						
Fauna and Flora						
<b><i>Social Component</i></b>						
Aesthetics and Landscape						
Human Communities						
Traffic						
Job/Income losses						
Health and safety						
Historical and Cultural Sites						
Safety and health of staff and population,						
Occupational health and safety						
GBV, SEA/SH, forced labor, child labor						
<b>OPERATION Phase</b>						
<b><i>Environmental Component</i></b>						
Soils						
Water Resources						
Air Quality						

<sup>20</sup> Activities requiring financial expenses are to be included in BoQ.

<sup>21</sup> Cost of mitigation activities is defined by a contractor in relevant items in bidding documents.

Fauna and Flora						
<b>Social Component</b>						
Aesthetics and Landscape						
Human Communities						
Historical and Cultural Sites						

Environmental and Social Elements	Impact	Mitigation Measure(s) <sup>18</sup>	Cost <sup>19</sup>		Institutional Responsibility	
			Install	Operate	Install	Operate
Safety and health of staff and population						
GBV, SEA/SH, forced labor, child labor						
<b>DECOMMISSIONING Phase</b>						
<i>Environmental Component</i>						
<i>Social Component</i>						

Annex 1

A temporary relocation or continuity of services plan is an annex to the ESMP.  
The elements of temporary relocation plan:

Criteria	Description
<b>Objectives and Scope</b>	
Purpose of relocation	
Facilities/services affected	
Full or partial relocation	
<b>Roles and Responsibilities</b>	
PIU	
Service agency/facility management	
Contractor	
<b>Assessment of Service Needs</b>	
Essential vs. non-essential services	
User volume and vulnerable groups	
Operational dependencies (utilities, IT, equipment)	
<b>Identification of Temporary Locations</b>	
Selection criteria	
Assessment of options and justification	
<b>Relocation Logistics</b>	



<b>Operation</b>									
<b>De-commissioning</b>									

## **Annex: 5 Abbreviated Livelihoods Restoration Plan (LRP)**

### **1. Objective**

This Abbreviated Livelihoods Restoration Plan (LRP) is prepared in accordance with ESS5 of the World Bank.

The LRP applies to temporary economic displacement affecting businesses operating within public buildings undergoing energy-efficiency rehabilitation.

The Project does not involve land acquisition, permanent displacement, or loss of land access. Impacts are limited to temporary income losses or disruptions to business operations during construction works.

The project will prioritize buildings where any ESS5 impacts to businesses can be fully avoided or mitigated without cash/financial compensation.

### **2. Project Description and Impact Scope**

The Project finances energy-efficiency rehabilitation works in public buildings, including:

- Replacement or upgrade of HVAC systems
- Thermal insulation and window replacement
- Electrical and lighting upgrades

Construction activities may temporarily affect businesses located within these buildings due to:

- Restricted access or circulation
- Temporary relocation
- Temporary closures or reduced operating hours
- Early termination of lease

Impact minimization measures

During the design phase, the Project will attempt to minimize disruptions to businesses by:

- Phasing works to reduce disruption to businesses
- Maintaining safe access wherever feasible
- Providing advance notice of construction schedules
- Installing signage to guide customers and users

All impacts are expected to be **minor and reversible**.

### **3. Legal and Policy Framework**

#### **3.1 World Bank Standard**

This LRP complies with ESS5, which requires that:

- Economic displacement is avoided or minimized where feasible
- Affected persons are assisted in restoring livelihoods and income

- Support is provided regardless of formal legal status

### **3.2 National Legal Framework and Gaps**

Relevant national and local laws related to business operation and compensation, including norms or contracts that apply to early termination of leasing agreements apply. Where gaps exist between national law and ESS5, ESS5 requirements prevail.

## **Assessment of Affected Businesses and Baseline**

### **4.1 Business Census**

Prior to construction, an assessment of the affected businesses will be conducted to:

- Identify all businesses operating within affected buildings

### **4.2 Baseline Information**

For each affected business, the following information will be collected:

- Type of business and services provided
- Lease or contractual arrangements in place with the public building and termination arrangements.
- Number of workers and wages/income
- Average monthly revenue (self-reported or documented)
- Normal operating days and hours
- Vulnerability factors (micro-businesses, women-owned, informal)

## **5. Eligibility and Mitigation Measures**

### **5.1 Eligibility**

Eligible affected parties include:

- Formal and informal businesses operating within project-affected buildings prior to the cut-off date
- Businesses and their employees experiencing demonstrable income loss due to construction activities, where impacts are assessed as minor and can be fully addressed through non-cash mitigation measures.

### **5.3 Mitigation Measures**

Affected businesses and employees may receive, for example, one or more of the following with the objective of improving or at least restoring incomes.

Measures under existing leases in case of early termination or other legal provisions will be considered when analyzing measures to reach full replacement cost. If such provisions are not sufficient, additional measures may be applied, which may include the following.

Affected businesses:

- Assistance to find an alternative location
- Transitional assistance during periods of disruption

**Moldova Energy Efficiency Revolving Mechanism (MEERM)**  
***Environmental and Social Management Framework***

- Non-cash support to reduce impacts (e.g., alternative access, signage, temporary relocation within the building)

Affected employees:

- Non-cash transitional measures, such as alternative workspace arrangements, flexible working hours, or temporary reassignment, which will be implemented in consultation with affected businesses.

These measures should be considered indicative and may be changed depending on specific circumstances.

**5.4 Special Measures for Vulnerable Businesses**

Additional support may be provided to:

- Micro-enterprises
- Informal or sole-proprietor businesses
- Women-owned or family-run businesses

**7. Consultation and Information Disclosure**

Affected businesses and employees will be:

- Informed of planned works, timelines, and potential impacts
- Consulted on feasible mitigation measures
- Provided with information on eligibility, mitigation measures, and grievance mechanisms

Consultation will continue throughout construction.

**8. Grievance Redress Mechanism (GRM)**

Affected businesses may submit grievances to the project GRM related to:

- Eligibility
- Delays
- Construction impacts

Use of the GRM does not preclude access to judicial or administrative remedies.

**9. Institutional Responsibilities**

- **Implementing Agency:** Overall responsibility for LRP implementation
- **Contractors:** Minimize impacts and cooperate with mitigation measures
- **Supervision Consultants:** Monitor compliance and impacts
- **Building Managers:** coordination in management of contractual arrangements with tenants

**10. Monitoring, Reporting, and Budget**

**10.1 Monitoring**

Key indicators include:

- Number of affected businesses
- Number receiving assistance
- Timeliness of non-cash measures
- Status of income restoration

## **10.2 Reporting**

Progress will be included in regular environmental and social monitoring reports.

## **10.3 Budget**

Adequate funds will be allocated to:

- Assistance
- Implementation and monitoring
- Contingency for unforeseen impacts

Funds will be available prior to the occurrence of impacts.

## **11. Implementation Schedule**

Livelihood restoration measures will be:

- Implemented in coordination with construction phases
- Provided prior to impacts, as required under ESS5

**Moldova Energy Efficiency Revolving Mechanism (MEERM)**  
**Environmental and Social Management Framework**

**Annex 6: Labor Management Procedures**

The Labor Management Procedures (LMP) is applicable to all project workers engaged by this project. This section summarizes key labor requirements of the LMP, highlighting key labor risk mitigations and responsible institutions.

In line with requirements of ESS2, the term “Project’s workers” refers to:

1. *Direct workers*: People employed or engaged directly by the Borrower (including the project proponent and the project implementing agencies) to work specifically in relation to the project;
2. *Contracted workers*: People employed or engaged through third parties to perform work related to core functions of the project, regardless of location;
3. *Primary supply workers*: People employed or engaged by the Borrower’s primary suppliers;
4. *Community workers*: People employed or engaged in providing community labor.

**Labor use under the project.** The labor use of the project will include ‘**direct workers**’ (e.g., PIU consultants), skilled and unskilled ‘**contracted workers**’ (e.g., engaged by construction companies), ‘**community workers**’ (e.g., local volunteers), and government civil servants (e.g., state and municipal, including NOEPI officers). The workforce is required for the duration of the project activities:

There is no intent to use voluntary community labor for the implementation of activities planned under the Project. Community members to be engaged by the Contractors in the construction works will be managed as “contract workers”. At this stage, it is unlikely that primary supply workers will engage in MEERM preparation for the implementation of the Project’s activities. It is also not expected that primary supply workers will participate in the implementation of the Project’s activities as defined under ESS2.

Below is the overview of anticipated project workers under the project. The number of project workers provided is indicative. More detailed numbers will become available during project implementation.

Type of project workers	Characteristics of project workers	Indicative number of workers	Applicable labor management procedures
<b>Direct workers</b>	<ul style="list-style-type: none"> <li>• PIU consultants, such as energy efficiency, FM, procurement and E&amp;S specialists.</li> </ul>	5 persons	This LMP
<b>Contracted workers</b>	<ul style="list-style-type: none"> <li>• Construction workers and energy efficiency companies. Includes subcontractor workers.</li> <li>• Their characteristics vary, including International/national positions and permanent/temporary staff.</li> <li>• They will be based in the country (no significant migrant workforce anticipated).</li> </ul>	200-300 persons	This LMP

<b>Government servant</b>	<b>civil</b>	<ul style="list-style-type: none"> <li>• CNED officer</li> <li>• Ministry of Energy</li> </ul>	5 persons	The terms and conditions of their existing public sector employment agreement or arrangement
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**Key labor risks and mitigations.** While the scale of civil work is expected to be limited, workers may still be exposed to health and safety risks at work sites, such as exposure to construction waste, heat, and animals/insects, as well as injuries from incidents. There are also risks of labor disputes, child labor, GBV/SEA/SH risks, and discrimination and exclusion of vulnerable groups. Labor influx risks and impacts are not anticipated, as local companies will typically implement most of the work. A summary of the policies and procedures addressing key labor risks is presented in the table below.

**Moldova Energy Efficiency Revolving Mechanism (MEERM)**  
**Environmental and Social Management Framework**

Key labor risks	Description	Policies to address risks	Procedures to back up the policy
<p><b>1. OHS risks</b></p>	<p>It is expected that the labor risks associated with the direct workers will be low, given the fact that Project implementing entities have high awareness of national labor legislation and the provisions of the Moldovan Labor Code (LC). Moreover, the type of work to be carried out by direct workers does not entail high vulnerability to abuse of labor rights or OHS risks.</p> <p>The OHS risks can be specifically for office works, such as: repetitive work, like computer use; sitting for long periods; poorly designed workstations; lifting, handling and moving office equipment and supplies; tripping on objects on the floor or power cords; workplace bullying, harassment and occupational violence; work-related stress and mental exhaustion/professional burnout.</p>	<ul style="list-style-type: none"> <li>Abide by OHS requirements as set out in Labor Code No. 154/2003 (Articles 224) and Law on Occupational Safety and Health No. 186/2008 and ESS2</li> </ul>	<ul style="list-style-type: none"> <li>Develop and implement an approved Contractor OHS Management Plan.</li> <li>Select a legitimate and reliable contractor through screening OHS records.</li> <li>Address adequately OHS risks with non-compliance remedies in procurement documents.</li> <li>Require the contractor to engage qualified ESHS staffing</li> <li>Enhance workplace OHS awareness and training.</li> <li>Conduct routine monitoring and reporting.</li> </ul> <p>Under Moldovan law, OHS is defined as a <b>managerial attribute</b>. The law establishes a dual-layer supervision system:</p> <ul style="list-style-type: none"> <li><b>Internal supervision-</b> the employer (Contractor) is legally obligated to organize OHS activities by either designating one or more workers to handle prevention and protection or by hiring an accredited <b>external prevention and protection service</b></li> <li><b>State supervision-</b>the State labor inspectorate exercises external control over the application of OHS legislation (Art. 7<sup>1</sup>).</li> <li><b>Legal mandate for coordination-</b> Arti. 10, para. (5) of Law 186/2008 stipulates that when workers from multiple units (e.g., Contractor, Subcontractors, PIU staff) are present at the same workplace, the employers must cooperate and coordinate their actions regarding the prevention of professional risks.</li> </ul>

Key labor risks	Description	Policies to address risks	Procedures to back up the policy
	<p>OHS risks of construction works include: Risks of accidents, injuries, and health issues for construction workers due to working at heights, handling heavy materials, use of power tools, and exposure to dust or hazardous substances (e.g., during asbestos removal)</p>		<ul style="list-style-type: none"> <li>The project approach -while the Contractor is responsible for the daily safety of its staff, the PIU—as the representative of the Project Promoter—is required by the World Bank’s ESS2 and the project’s ESMF/LMP to provide an additional layer of oversight.</li> <li>The OHS/Social Specialist - the PIU shall engage its own qualified EHS Specialist and a social specialist. These are not just internal advisors; they function as independent monitors who oversee the Contractor’s compliance with the OHS Management Plan.</li> </ul> <p>While the Contractor has the primary "expert" on-site, the Project Promoter (PIU) acts as the coordinator and supervisor, hiring its own independent specialists to monitor, inspect, and penalize the Contractor to ensure 100% compliance with national and international OHS standards.</p>
<p><b>2. Labor disputes</b></p>	<p>The risk of labor disputes is assessed as <b>low-moderate</b> and manageable through strict adherence to established legal protocols. Potential disputes may arise from disagreements over working hours, overtime compensation, or delays in wage payments. To mitigate this, the project mandates that all contractors respect the <b>National Labor Code No. 154/2003</b> and provide workers with written contracts featuring fair and transparent terms. A robust,</p>	<ul style="list-style-type: none"> <li>Respect the national Labor Code nr.154/2003 and Government Decision on the organization and functioning of the State Labor Inspectorate No. 788 /2013 and promptly address workplace grievances to minimize the risk of labor disputes.</li> </ul>	<ul style="list-style-type: none"> <li>Provide workers with contracts with fair terms and conditions.</li> <li>Have grievance mechanisms in place to promptly address workplace concerns.</li> <li>Respect the national Labor Code nr.154/2003 on workers’ right of labor unions and freedom of association.</li> </ul>

**Moldova Energy Efficiency Revolving Mechanism (MEERM)**  
**Environmental and Social Management Framework**

Key labor risks	Description	Policies to address risks	Procedures to back up the policy
	<p>internal GRM is embedded within the project structure to allow workers to raise concerns early and settle grievances bilaterally. Furthermore, the project strictly respects workers' rights to join labor unions and exercise freedom of association as a primary means of preventing systemic labor unrest.</p>		
<p><b>3. Discrimination and exclusion of vulnerable or disadvantaged groups</b></p>	<p>The risk of discrimination and exclusion is assessed as <b>moderate</b>, requiring active intervention to ensure equal opportunity. Risks include potential bias in recruitment processes or the exclusion of women, persons with disabilities, and ethnic minorities from project benefits. In accordance with the <b>Law on Ensuring Equality No. 121/2012</b>, the Project prohibits any form of discrimination regarding employment and workplace treatment.</p> <p>To actively address this, contractors are required to:</p> <ul style="list-style-type: none"> <li>• Incentivize the employment of <b>vulnerable groups</b></li> </ul>	<ul style="list-style-type: none"> <li>• Promote no discrimination and equal opportunity with respect to any aspects of the employment relationship, based on the Law on ensuring equality No. 121/2012</li> </ul>	<ul style="list-style-type: none"> <li>• Require the contractor to employ vulnerable groups as part of unskilled workforce.</li> <li>• Provide maternity leave and nursing breaks where relevant.</li> <li>• Arrange sufficient and suitable toilet and washing facilities, separate for men and women workers.</li> <li>• Provide adequate conditions and protections to vulnerable workers, including foreign workers.</li> </ul>

Key labor risks	Description	Policies to address risks	Procedures to back up the policy
	<p>as part of the unskilled workforce.</p> <ul style="list-style-type: none"> <li>• Ensure the provision of <b>separate and suitable sanitary facilities</b> for men and women.</li> <li>• Enforce legal protections such as <b>maternity leave and nursing breaks</b> to support female workers.</li> <li>• Regularly monitor payroll and recruitment records to verify that equal pay for equal work and non-discriminatory hiring practices are maintained throughout the project lifecycle.</li> </ul>		
<p><b>4. Child labor</b></p>	<p>Risk of child labor is assessed as low-moderate and preventable. The construction activities will involve hazardous work and therefore persons under the age of 18 will not be eligible for employment under the Project. The Project's activities will be supervised and inspected in order to</p>	<ul style="list-style-type: none"> <li>• Set the minimum age of project workers eligible for any type for work (including 18 years old for construction work), in compliance with ESS2 and national law.</li> </ul>	<ul style="list-style-type: none"> <li>• Include minimum age (18 years old) in procurement documents.</li> <li>• Raise awareness on child protection with contractors and in the communities.</li> <li>• Maintain labor registry of all contracted workers with age verification.</li> <li>• Establish clear remedial procedures in case of child labor incidents, including immediate removal of underage workers and referral to appropriate social services.</li> </ul>

**Moldova Energy Efficiency Revolving Mechanism (MEERM)**  
**Environmental and Social Management Framework**

Key labor risks	Description	Policies to address risks	Procedures to back up the policy
	monitor and prevent risk of child labor.		
<b>5. GBV/SEA/SH</b>	Risk of gender-based violence (GBV) is assessed as low and preventable risk. Incidents have not been reported on previous implemented projects. Therefore, the GBV aspect in the Project implementation will focus on prevention of GBV	<ul style="list-style-type: none"> <li>• Implement SEA/SH prevention and response, consistent with ESS.</li> </ul>	<ul style="list-style-type: none"> <li>• Require all contractor workers to sign a Code of Conduct that includes prohibitions of engaging in sexual exploitation and abuse and sexual harassment in the workplace or in the community, and that includes sanctions for non-compliance.</li> <li>• Train workers on the code of conduct and prevention of SEA/SH risks.</li> <li>• Conduct awareness raising</li> <li>• Make available an accessible GRM with specific mechanisms to address SEA/SH complaints.</li> <li>• Train GBV focal point in the PIU (E&amp;S specialists) on handling related complaints and also on GBV service providers referral mechanism.</li> <li>• Integrate confidential SEA/SH reporting channels into the project’s GRM.</li> <li>• Require the contractor to address potential sexual exploitation or harassment in recruitment or retention of skilled or unskilled female workers.</li> <li>• Establish links with local GBV service providers for timely survivor-centered support and referral.</li> </ul>

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**Minimum age for project workers.** The following policies and procedures will be applied to manage the risk of child labor.

- **Hazardous work:** The national Labour Code nr. 154/2003 (Article 46) provides that persons acquire working capacity upon reaching the age of 16 years. The Code (Article 255) sets a specific age limit for hazardous work, stipulating that the minimum age for employment in underground work in quarries or mines shall be 18 years. Similarly, ESS2 (para 19) sets out further conditions on the minimum age, stating that a child over the minimum age and under the age of 18 will not be employed or engaged in connection with the World Bank-financed project in a manner that is likely to hazardous or interfere with the child's education or be harmful to the child's health or physical, mental and any other relevant development. Considering these national and WB requirements, **the minimum age for work under the project is set at 18.**
- **Age verification protocol:** To prevent engagement of underage labor, all contracts with work contractors shall have contractual provisions to comply with the minimum age requirements, including penalties for non-compliance, and it will be well communicated to all potential stakeholders, including the local community where the unskilled workforce will be sourced. The contractor is required to maintain a labor registry of all contracted workers, including their age information. Verification of the age shall be undertaken before the engagement of labor and documented.

**Terms and conditions for direct workers (PIU consultants).** The terms and conditions for direct staff and consultants of the project will be governed by their existing work contract, ESS2 and the national labor code, whichever is more stringent.

**Terms and conditions for contracted workers.** Labour Code of Moldova No. 154/2003 is the guiding legislation on employment terms and conditions for contracted workers. Below are key components of the terms and conditions that should be applied to contracted workers under these categories.

- **Provision of written individual contract of employment.** According with Article 49 of the Labour Code No.154/2003 a written individual contract of employment shall be provided to workers that specify the following: (a) name of workers; (b) address, occupation, age and sex of workers; (c) employer's name and address; (d) nature and duration of contract; (e) hours and place of work; (f) remuneration payable to the worker; (g) procedure for suspension or termination of contract. Depending on the origin of the employer and the employee, employment terms and conditions will be communicated in a language that is understandable to both parties. In addition to written documentation, an oral explanation of conditions and terms of employment will be provided to workers who may have difficulty understanding the documentation.
  - **Notice for termination of contract.** Either of the contracting parties may terminate a contract of employment by giving written notice as under: (a) not less than ten days in the case of manual workers; or (b) not less than 30 days in the case of non-manual workers. No notice needs to be given in case the duration of contract does not exceed one month.
  - **Minimum Wages.** The official minimum wage is set annually by the Government Decision No. 846 of December 18, 2024, establishing the national minimum wage for 2025 (effective January 1, 2025). The project shall pay more than the minimum wages.
  - **Hours of Work.** The normal working hours of a project worker shall not exceed 8 hours a day or 40 hours a week, according to Article 98 of the Labour Code No.154/2003. Hours worked in excess of the normal hours of work shall not exceed 12 hours a week and shall entitle a worker to a proportionate increase in remuneration.
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## **Moldova Energy Efficiency Revolving Mechanism (MEERM)**

### ***Environmental and Social Management Framework***

- **Rest per week.** Every worker shall be entitled to two day's rest each week, which should usually fall on Friday. It shall consist of at least 48 consecutive hours each week. Workers shall also be entitled to a rest day on public holidays.
- **Annual leave.** Workers shall be entitled to 28 days' leave with pay for every year of continuous service. (Article 113 Labour Code). An entitlement to leave with pay shall normally be acquired after a full year of continuous service.
- **Maternity leave.** Salaried women and apprentices, as well as wives dependent on salaried employees, are granted maternity leave, which includes prenatal leave lasting 70 calendar days (in the case of pregnancies with three or more fetuses – 112 calendar days) and postnatal leave lasting 56 calendar days (in the case of complicated births or the birth of two or more children – 70 calendar days), with allowances paid for this period.
- **Nursing breaks.** A female worker who is nursing her own child shall be entitled, for a maximum of three years after the date of birth of the child, with the allowance being paid from the state social insurance budget. The breaks should be counted as working hours and remunerated accordingly.
- **Deductions from remuneration.** No deductions other than those prescribed by the Code or regulations made hereunder or any other law or collective labour agreement shall be made from a worker's remuneration, except for repayment of advances received from the employer and evidenced in writing. The contractor shall not demand or accept from workers any cash payments or presents of any kind in return for admitting them to employment or for any other reasons connected with the terms and conditions of employment.
- **Medical treatment of injured and sick workers.** It shall be the duty of the employer to arrange at his own expense for the conveyance to the nearest hospital of any wounded or ill worker who can be so conveyed and who cannot be treated on the spot with the means available.
- **Collective Agreements.** A collective agreement is an agreement relating to terms and conditions of work concluded between the representatives of one or more trade unions, on the one hand, and the representatives of one or more employers, on the other hand. Where collective agreements exist between the employer and project workers, such agreements will be applied, where relevant.

**Identification of potential hazards to project workers.** The identification of hazards, specifically those that pose a life-threatening risk, is governed by Articles 10 and 13 of Law No. 186/2008 occupational health and safety. The project shall implement a rigorous process for identifying and managing risks based on the following legal framework:

The employer/project manager is legally required to be in possession of a professional risk assessment. This must identify all potential sources of injury or illness (hazards) related to equipment, chemical substances, and the physical setup of the workplace (Mandatory risk assessment (Art. 13, lit. a):

The process of identifying and addressing hazards must be conducted according to the "General Principles of Prevention" stipulated in the law (principles of prevention as the basis for identification (Art. 10, para. 3):

- The primary goal is to avoid professional risks entirely (lit. a). Where risks cannot be avoided, a formal evaluation must be conducted (lit. b) to determine their severity.
- Hazards must be combated at their source (lit. c) rather than merely managing their consequences.
- The project is obligated to replace dangerous aspects with non-dangerous or less dangerous alternatives (lit. f).
- Identification leads to the implementation of collective protection measures, which take priority over individual protective equipment (lit. h).

For hazards categorized as "grave and specific" (life-threatening), the project must ensure that (life-threatening hazards and specific risks (Art. 10, para. 4, lit. e) :

- Only workers who have received adequate instructions, possess specific qualifications, and are equipped with the necessary safety gear have access to these high-risk zones.

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## **Moldova Energy Efficiency Revolving Mechanism (MEERM)**

### ***Environmental and Social Management Framework***

- The identification process accounts for vulnerable groups (e.g., persons with disabilities or young workers), ensuring "reasonable accommodation" and the provision of assistive technologies to maintain a safe environment (lit. d, j).

The identification is not a one-time event; it must be updated to adapt to technical progress and be part of a coherent prevention policy that includes technology, work organization, and environmental factors (continuous improvement and technology (Art. 10, para. 3, lit. e, g) .

### **Provision of preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances.**

The project ensures the implementation of preventive and protective measures by strictly adhering to the hierarchy of risk control established in Article 10 and Article 13 of Law No. 186/2008.

The primary legal objective is the avoidance of professional risks (elimination). Where a hazard cannot be entirely eliminated, the project is legally obligated to replace the hazardous aspects with non-hazardous or less hazardous aspects (substitution), (Elimination and substitution (Art. 10, para. 3, lit. a, f) This includes:

- Modifying work processes to eliminate hazardous conditions.
- Substituting toxic or hazardous substances with safer alternatives to ensure the highest level of health protection.

The project focuses on combating professional risks at their source. This involves adapting the workplace to the latest technical progress, ensuring that equipment and production methods are chosen to minimize or eliminate exposure to hazardous conditions before they affect the worker (Combating risks at the source (Art. 10, para. 3, lit. c, e).

3. In accordance with the law, the project gives absolute priority to collective protection measures (e.g., ventilation systems, soundproofing, safety barriers) over individual protective measures. Individual protective equipment (PPE) is only utilized as a secondary measure when technical and collective solutions cannot fully eliminate the risk (Priority of collective protection (Art. 10, para. 3, lit. h) .

4. Based on the specific nature and degree of professional risk, the project shall develop and implement a Prevention and Protection Plan (The prevention and protection plan (Art. 13, lit. f)) . This plan includes:

- Technical measures: engineering controls and equipment modifications.
- Sanitary and organizational measures: establishing hygienic conditions and safe work protocols.
- The plan is continuously adjusted whenever work conditions change or new risks are identified, ensuring the measures remain effective.

5. Preventive measures include adapting the workplace to the individual, particularly regarding the choice of work equipment and methods. This extends to providing "reasonable accommodation" and assistive technologies for persons with disabilities to ensure their safety and health are maintained at the same standard as all other project workers (adaptation of work (Art. 10, para. 3, lit. d, j)) .

### **Training of project workers and maintenance of training records;**

The project implements a comprehensive training system that ensures no worker is exposed to risks without prior preparation, as mandated by Article 17 and Article 13 of the Law.

1. The project provides OHS training that is specific to the workplace and the job functions. Training is mandatory in the following instances (mandatory training conditions (Art. 17, para. 1-4) :

- Initial training upon recruitment/hiring.
- When a worker is transferred or their job description changes.
- Upon the introduction of new work equipment or changes in technology.
- Periodical training is conducted at regular intervals to refresh safety knowledge.

2. Law provides several rules related to the training characteristics (Art. 17, para. 5-7), such training is performed during working hours, and the costs are entirely borne by the employer (cost-free, Art. 10, para. 7). For "remote workers" the project provides necessary informational materials such as guides, posters, and films (Art. 13, lit. j). Training includes specific instructions for "zones of grave and specific risk" (Art. 10, para. 4, lit. e), ensuring only qualified personnel enter high-danger areas.

3. The project maintains a rigorous documentation system to ensure legal accountability (maintenance of training records (Art. 17, para. 7 & Art. 13, lit. i)) with the following conditions: Every training session is recorded in a specific OHS training card, (which must be signed by the worker, the trainer, and the supervisor (individual training files). Under Article 13, lit. I, the employer (or designated

## **Moldova Energy Efficiency Revolving Mechanism (MEERM)**

### ***Environmental and Social Management Framework***

workers/external services), is responsible for ensuring that all workers understand and apply the safety measures learned during training. Following Article 17, para. 7, the project strictly prohibits the admission of any worker to their duties without a documented record of their training.

4. The "Designated Worker" or the "External Prevention Service" is responsible for organizing these training sessions and ensuring they are adapted to the structure of the unit and the specific risks identified in the project.

### **Documentation and reporting of occupational accidents, diseases, and incidents**

The project establishes a protocol for managing all work-related events, in full compliance with Article 13 and Chapter VI (Articles 28–32) of the Law. In the event of an accident or incident, the employer is legally obligated to provide immediate notification and communication. Art13, lit. p; Art. 11). Communicate immediately to the State Labor Inspectorate, the National Social Insurance House, and, where applicable, the trade unions or worker representatives. Inform the designated worker or the external prevention and protection service to initiate internal emergency protocols.

The project maintains a centralized documentation system, which includes a mandatory log of all accidents that result in incapacity to work exceeding three days (the Register of Occupational Accidents). Formal documentation for "near-misses" or incidents that did not result in injury but revealed a failure in safety measures (to collect the incident reports).

The project is responsible for ensuring that every event is thoroughly investigated (investigation and research, Art. 28–30). Investigations can be conducted as internal investigations into accidents resulting in temporary incapacity, where a commission appointed by the employer conducts research to determine the cause. For accidents resulting in severe injury or death, an external investigation is conducted by the State Labor Inspectorate. Additionally, the findings are a modality for documenting in a formal investigation Protocol, which details the circumstances, the violated legal provisions, and the measures required to prevent a repeat occurrence.

The project must document and report cases of occupational diseases. These are investigated in collaboration with the authorities responsible for public health, ensuring that the link between the working environment and the illness is officially established and recorded (reporting of occupational diseases. (Art. 31)

The project manager is legally responsible for the costs associated with investigating accidents and preserving the accident scene (unless preservation poses a further danger) (financial responsibility, Art. 32).

### **Emergency prevention and preparedness and response arrangements to emergency situations;**

The project implements emergency protocols in strict accordance with Article 10, Article 11, and Article 12 of the Law, ensuring that the work environment is prepared for grave and immediate dangers.

The project manager is legally required to appoint specific workers to handle emergency duties (designation of emergency personnel (Art. 12, para. 2-3) ). These include: first aid providers, personnel trained to stabilize injured workers until medical services arrive. Workers are responsible for coordinating the use of fire extinguishers and leading colleagues to safety. The number of designated persons and their training must be proportional to the size of the unit and the specific risks of the project.

The project establishes mandatory links with external specialized services (coordination with external services (Art. 12, para. 1, lit. b), including: the emergency medical service (Ambulance); rescue and firefighting services); external OHS prevention services for specialized emergency audits.

In the event of a critical emergency, the project follows the legal mandates (operational protocols for grave and immediate danger, Art. 12, para. 4, 6): an immediate information mechanism through which all workers must be notified instantly of the risk and the protective measures being taken (lit. a). Under conditions of "grave, immediate, and unavoidable danger," instructions must be given to allow workers

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## **Moldova Energy Efficiency Revolving Mechanism (MEERM)**

### ***Environmental and Social Management Framework***

to cease work, leave the workplace immediately, and retreat to a safe zone (lit. b), thereby applying the right to stop work. If a direct superior cannot be contacted, workers are legally empowered to take appropriate measures, according to their knowledge and technical means, to avoid the consequences of the danger (para. 6), thereby applying the approach of worker autonomy.

The project ensures that workers who leave their post or a dangerous zone during an emergency are protected from any "negative and unjustified consequences." They cannot be disadvantaged for acting to save themselves or others, provided they did not act with gross negligence (protection of workers (Art. 12, para. 5, 7)).

The project ensures the physical availability of:

- Evacuation plans and emergency signage.
- Maintained firefighting equipment (extinguishers, hydrants).
- First aid kits and, where necessary, specialized medical rooms to maintain "hygienic conditions for life and work."

### **Remedies for adverse impacts such as occupational injuries, deaths, disability, and disease.**

The project operates under the fundamental principle established in Article 9, para. (1): The employer bears full responsibility for the security and health of workers. In the event of adverse impacts, the following remedies are provided in accordance with the Law:

Full liability and the principle of no cost to workers (Art. 10, para. 7) are applied. Under no circumstances shall the measures or remedies for occupational health and safety involve financial obligations for the workers. The project manager is responsible for ensuring that all medical and recovery costs arising from workplace failures are covered.

Compensation for occupational injuries and diseases is applied (Art. 13, lit. q). The project must facilitate the repair of damage caused by occupational accidents and diseases. This includes. Covering the costs for medical treatment, prosthetics, and specialized recovery services that are not fully covered by the mandatory state health insurance.

Ensuring that workers who suffer from "temporary incapacity for work" (as recorded under Art. 13, lit. c) receive the legal indemnities provided by the social insurance system.

In cases of permanent disability or death, the project follows the legal protocols for long-term remedies (remedies for disability and fatalities (Art. 9 & Art. 13). Coordinating with the National Social Insurance House to ensure the worker receives a pension based on the degree of disability established during the investigation. In the case of fatalities, the project is liable for paying compensatory sums to the legal dependents of the deceased, as established by the Labor Code and the Law on Insurance against occupational accidents.

If a worker is diagnosed with an occupational disease, the project is required to: provide a change of workplace or a modification of duties to prevent further deterioration of health. Support the investigation process to ensure the worker is officially recognized as having a professional illness, which triggers higher levels of social protection (occupational disease management, (Art. 31).

Beyond the administrative remedies, the Law recognizes that workers who suffer adverse impacts cannot be disadvantaged or dismissed due to their medical condition resulting from a workplace accident (Art. 12, para. 5). The project remains liable for civil damages (moral and material) if the investigation proves that the injury, death, or disease was caused by the employer's failure to implement the prevention and protection plan (Art. 13, lit. f).

The activities in the field of occupational health and safety described in this paragraph are the responsibility of the project, but must be divided between the PIU and Contractors through the documents prepared for the tendering/contracting process.

**Grievance Redress Mechanisms for Project Workers.** A grievance Mechanism for the project's workers will be established under the MEERM project, in accordance with the provisions of the World Bank's ESS2. The objective of this procedure is to settle grievances between an employer and employee, or between employees, bilaterally before the intervention of a formal court, except in cases where the grievance constitutes a criminal offense that requires notification to law enforcement. However, the GRM will not impede access to other judicial or administrative remedies that may be available under the law, nor will it substitute for grievance mechanisms provided through collective agreements. Under

## **Moldova Energy Efficiency Revolving Mechanism (MEERM)**

### ***Environmental and Social Management Framework***

the provisions of ESS2, the project will provide a grievance mechanism for all direct and contracted workers to raise workplace concerns. Workers will be informed of this grievance mechanism at the time of recruitment and of the measures in place to protect them from any reprisal for using it. The project will implement measures to make the worker grievance mechanism easily accessible to all project workers.

The Contractors should consider streamlined procedures to address specific worker grievances, which would allow workers to quickly report labor issues, such as a lack of PPE, a lack of proper procedures, or unreasonable overtime, and enable the project to respond and take necessary action.

The CNED's social specialist and environmental, health, and safety specialist will also provide overall implementation and capacity-building support in resolving all workers' grievances. They will also include workers' grievance status in the progress report.

The Grievance Mechanism for the Project's workers is detailed in the Labor Management Procedures prepared for the Project.

The Project shall maintain the following internal channels for the submission of workplace concerns. **These channels** are managed directly by the Contractor/PIU and are not outsourced to third parties:

- Grievance boxes shall be installed at all project sites. Complaint/Comment forms must be readily available next to the boxes.
- A dedicated project email address [office@cned.gov.md](mailto:office@cned.gov.md) shall be monitored daily by CNED
- A dedicated CNED telephone hotline 0-8005-5005 is operational during working hours.
- Workers may submit grievances through physical boxes or the hotline without disclosing their identity. Anonymous complaints will be treated with the same urgency as identified ones.
- Contractors shall hold daily team meetings at the end of the workday to allow for the immediate verbal reporting of labor issues.

### **Confidentiality and anti-reprisal mandate**

Access to the grievance database is restricted to the relevant specialist within CNED. The identity of the grievant shall not be disclosed to immediate supervisors or third parties without explicit written consent. During the mandatory induction session, all workers are formally notified that any form of retaliation (termination, demotion, or harassment) for using the LGRM is a material breach of the Code of Conduct and will result in disciplinary action against the offender.

### **Response timeframes and escalation**

The Project commits to the following "Fast-Track" resolution schedule:

<b>steps</b>	<b>action</b>	<b>timeframe</b>
Acknowledgment	Receipt of grievance confirmed to the worker.	Within 24 hours
Urgent Issues	Response to safety issues (Lack of PPE, hazards).	Immediate / Within 24 hours
Standard Issues	Review and proposed resolution of labor concerns.	Within 7 business days
Final Resolution	Implementation of corrective action and closing.	Within 15 business days

If a worker is unsatisfied with the Contractor's response, or if the grievance involves the direct supervisor, the worker has the right to escalate the concern directly to the PIU/CNED or the Ministry.

### **Administrative responsibilities (collection & tracking)**

To ensure accountability, the following roles are assigned:

- The Social Specialist (PIU) - responsible for the oversight of the entire mechanism, providing capacity building, and managing the Master Grievance Log.

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## Moldova Energy Efficiency Revolving Mechanism (MEERM)

### *Environmental and Social Management Framework*

- The EHS Specialist - responsible for resolving grievances related to OHS and technical working conditions.
- Contractor grievance officer - must record every grievance in a Standardized Grievance Register within 24 hours of receipt.
- Reporting- a summary of all grievances (status, time-to-resolution, and type) must be included in the Monthly Progress Report submitted to the PIU.

### **Embedded anonymity and direct access**

The mechanism is strictly internal to the Project hierarchy to ensure direct accountability. All intake and processing are handled by the Contractor or the PIU. During induction, every contracted worker is provided with the direct contact details of the PIU Social Specialist. This ensures that even if the Contractor's internal system is compromised, the worker has a direct, embedded path to raise concerns safely and anonymously to a higher project authority.

By integrating the grievance mechanism directly into the Project hierarchy, the mechanism ensures that: Grievances are managed by those with the immediate power to fix workplace conditions, without the delays or lack of context often associated with third-party outsourcing.

If a worker feels the Contractor's management is the source of the grievance or is failing to maintain confidentiality, the worker can bypass the local level and contact the PIU Social Specialist directly.

The responsibility for investigating and resolving labor issues remains a core duty of the PIU and the Contractor, ensuring that resolution is tied to project performance and contractual compliance.

Every worker's right to this internal escalation is established at the moment of hire, ensuring that the contact details for anonymous reporting are physically in the worker's possession before they even step onto the work site.

- **Direct workers (PIU consultants).** Considering the limited number of project workers in this category, the project will have a simplified but effective grievance system. The PIU will hold periodic team meetings to discuss any workplace concerns. The grievances raised by workers will be recorded, along with the actions taken by each agency. Suppose the aggrieved direct worker wishes to escalate their issue or raise concerns anonymously and/or with a person other than their immediate supervisor/hiring unit. In that case, they may do so with the Ministry or relevant municipal authorities.
- **Contracted workers.** Contractors must make available an accessible grievance mechanism for their workers. Such a mechanism must include:
  - Multiple channels to receive grievances such as comment/complaint form, email, telephone number, including channels that accept anonymous grievances.
  - Stipulated timeframes to respond to grievances
  - A register to record and track the resolution of grievances
  - A responsible person or committee to record and track resolution of grievances.

As a good practice, the project site manager and the ESHS officer (or any other appropriate officers, such as E&S focal points) of the contractor and service provider will hold a daily team meeting with all present contracted workers at the site at the end of the daily work to discuss any workplace grievances.

Grievances raised will be recorded with the actions taken by the contractor and service provider. The summary of grievance cases will be included in the periodic report.

Where appropriate and available, the contracted workers should be allowed to utilize an existing grievance mechanism within the contractor or service provider. Where aggrieved workers wish to escalate their issue or raise concerns outside of the contractor's worker GRM, they may do so with the PIU, including anonymously. Contracted workers will be informed of the grievance mechanism during the induction session before commencing work. The contact information of the PIU will be shared with contracted workers.

**Moldova Energy Efficiency Revolving Mechanism (MEERM)**  
***Environmental and Social Management Framework***

- **National appeal process.** According to the National Labour Code No. 154/2003 (Article 9), any individual labour dispute can be submitted by either party to the district court for resolving the conflicts.
- **Grievances related to Gender Based Violence (GBV).** See the subsection on GRM under the Stakeholder Engagement Section.

**Contractor management**

- **Selection of Contractors.** The PIU shall make reasonable efforts to ascertain that the contractor or service provider engaging contracted workers is a legitimate and reliable entity, able to comply with the relevant requirements under the LMP. Such requirements shall be included in the procurement documents. As part of the process of selecting the contractors or service providers who will engage contracted workers, the PIU and IPs may review the following information:
  - Business licenses, registrations, permits, and approvals
  - Public records, for example, corporate registers and public documents relating to violations of applicable labor law; accident and fatality records and notifications to authorities; labor-related litigations; Documents relating to the contractor's labor management system and OHS system (e.g., HR manuals, safety program); ESHS personnel and their qualification
  - Previous contracts with contractors and suppliers (showing inclusion of provisions and terms reflecting requirements on labor and working conditions).
- **Contractual Provisions and Non-Compliance Remedies.** The PIU shall incorporate the relevant labor management requirements into contractual agreements with the contractor or service provider, together with appropriate non-compliance remedies (such as the provision on withholding 10 % of payment to the contractor in case of non-compliance with relevant environmental, social, health, and safety requirements; removal of personnel from the works; or forfeiting the ESHS performance security.). In the case of subcontracting, the PIU will require the contractor or service provider to include equivalent requirements and non-compliance remedies in their contractual agreements with subcontractors.
- **Performance Monitoring.** The PIU shall establish resources and procedures for managing and monitoring the contractor's performance in relation to the ESMF/LMP. The PIU will ensure that the contractor or service provider explicitly sets out their monitoring responsibility for the contractor's performance in terms of labor and working conditions daily. The monitoring may include inspections, and/or spot checks of project locations or work sites, and/or of labor management records and reports compiled by the contractor or service provider. Contractors or service providers' labor management records and reports that should be reviewed would typically include the following:
  - Representative samples of employment contracts and a signed code of conduct.
  - Grievances received from the community and workers, and their resolution.
  - Reports relating to fatalities and incidents and implementation of corrective actions.
  - Records relating to incidents of non-compliance with the national Labour Code and the provisions of the LMP; and
  - Records of training provided for contracted workers to explain occupational health and safety risks and preventive measures.

## **Annex 7: Requirements and measures when handling asbestos**

### **Organizational measures**

The use of ACM as a new material in construction or renovation activities will be not supported under the project.

Existing facilities where the ACM will be replaced/removed should apply a series of mitigation measures and monitoring activities which would ensure a proper handling of these materials avoiding any potential impacts on the workers' health. At the initial stage of project implementation, the contractor should identify the locations where the ACM is present, its condition (e.g., whether it is in friable form or has the potential to release fibers), define the procedures for supervision and monitoring as well as, develop procedures on avoiding ACM destruction, and conduct training of its staff in handling the ACM.

Before starting work and even before submitting a tender for work with materials containing asbestos, an employer must take a number of different steps. By planning and preparing the work procedures carefully, an employer can avoid exposing workers to risks, e.g. as a result of improvisation or disruption of the work process, and thus provide the basis and the necessary conditions for safe completion of the work.

The most important measures are: (i) the notification to the authorities, (ii) the risk assessment and (iii) the work plans.

In addition, employees must be given the opportunity to have a medical examination. Moreover, before starting with demolition and refurbishment work the companies should give proof of their expertise.

The more conscientiously the employers and their workers observe these rules, the smoother and therefore the more economically the work can be carried out.

### **Working instructions**

These measures and activities are briefly specified also in the site-specific ESMP/ESMP Checklist and would include the following steps and requirements:

- a. Determine if the project could include the replacement, maintenance or demolition of: (a) Roofing, siding, ducts or wallboard; (b) Thermal insulation on pipes, boilers, and ducts; and (c) Other potentially asbestos-containing materials.
- b. Once the presence of ACM in the existing infrastructure has been presumed or confirmed and their disturbance is shown to be unavoidable, incorporate the following requirements in the civil works to be performed:
  - i prior to any removal and disposal of ACMs the method and location of ACM disposal shall be approved by the CNED and the applicable regulatory agency
  - ii identification of ACMs should be conducted by a qualified asbestos inspector to identify any ACMs present in the buildings; the survey will include visual inspections
  - iii containment of interior areas where removal will occur;
  - iv protection of walls, floors and other surfaces with plastic sheeting;
  - v providing decontamination facilities (showers) for workers and equipment;
  - vi removal of the ACM using wet methods and promptly placing the material in impermeable containers;
  - vii final clean-up with special vacuums and dismantling of the enclosure and decontamination facilities in a careful manner;
  - viii disposal of the removed ACM and contaminated materials in an approved landfill, burying it;
  - ix inspection and air monitoring during the civil works by an entity independent of the contractor removing the ACM (might be done by environmental and/or sanitary inspectors);

### **Immediate Action**

On discovering ACM on a Project site, the contractor must:

- a) Stop all work within a 5 m radius of the ACM and evacuate all personnel from this area;

## **Moldova Energy Efficiency Revolving Mechanism (MEERM)**

### ***Environmental and Social Management Framework***

- b) Delimit the 5 m radius with secure fencing posts, warning tape and easily visible signs warning of the presence of asbestos;
- c) If the site is in an inhabited area, place a security guard at the edge of the site with instructions to keep the general public away;
- d) Notify the CNED's Environmental Specialist and arrange an immediate site inspection.

### **Personal Protective Equipment (PPE)**

All personnel involved in handling ACM must wear the following equipment, provided by the contractor:

- a) Disposable overalls fitted with a hood;
- b) Boots without laces;
- c) New, strong rubber gloves;
- d) A respirator is not normally required if there are only a few pieces of ACM in a small area, and if the ACM is damp;
- e) There must be no smoking, eating or drinking on a site containing ACM.

### **Disposal**

ACM should be disposed of safely at a local hazardous-waste disposal site if available, or at the city municipal dumpsite after making prior arrangement for safe storage with the site operator.

- The Contractor must arrange for the disposal site operator to collect the sealed asbestos waste containers as soon as possible and store them undisturbed at the disposal site.
- At the end of construction Contractors must arrange for the disposal site operator to bury all ACM containers in a separate, suitably sized pit, covered with a layer of clay that is at least 250 mm deep.

### **Personal Decontamination**

At the end of each day, all personnel involved in handling ACM must comply with the following decontamination procedure:

- At the end of the decontamination operation, clean the boots thoroughly with damp rags;
- Peel off the disposable overalls and plastic gloves so that they are inside-out and place them in a plastic sack with the rags used to clean the boots;
- If a disposable respirator has been used, place that in the plastic sack, seal the sack and place it in an asbestos waste container.
- All personnel should wash thoroughly before leaving the site, and the washing area must be cleaned with damp rags afterwards, which are placed in plastic sacks as above

Working instructions are an indispensable component of staff training. They point out the risks to the workers and explain to them the protective measures required.

Whilst the work plan is primarily addressed to supervisors, the working instructions are intended for the workers themselves, identifying the risks, the corresponding protective measures and their expected behavior. Information relating to their workplace and tasks enables workers to act safely in full awareness of the risks.

Working instructions should be concisely and clearly formulated, so that all employees can understand them. They should be displayed at the place of work where they are clearly visible. The staff should observe the working instructions of the employer. The instructions must give information on: (i) the type of work and specific tasks, (ii) the hazardous materials containing asbestos, (iii) personal protective equipment, (iv) necessary protective and hygienic measures, (v) what to do in the case of breakdowns, accidents and other emergencies, (vi) how to deal with waste For simple tasks this information can be included in the work plan, which then replaces the working instructions.

The CNED should require the contractors to provide training of workers and supervisors, adequate equipment and supplies for the scope of works, including adequate closing, gloves and respirators.

**Moldova Energy Efficiency Revolving Mechanism (MEERM)**  
***Environmental and Social Management Framework***

These issues and requirements should be reflected in the contract clauses. These clauses should also specify the selected contractor notifies the relevant authorities (environment and/or sanitary inspections) of the removal and disposal and cooperates fully with representatives of the relevant agencies during all inspections and inquiries.

The removal and disposal of ACM as well as all other EMP measures have to be included in both the technical specifications and bill of quantities (BoQs).

## **Annex 8: Chance Find Procedure**

### **Purpose**

A Chance Find Procedure is a project-specific procedure which is to be followed if previously unknown cultural heritage is encountered during project activities. The Chance Find Procedure sets out how chance finds associated with the project will be managed. The procedure includes a requirement to notify The Ministry of Culture and the National Archaeological Agency of found objects or sites by cultural heritage experts; to fence off the area of finds or sites to avoid further disturbance; to conduct an assessment of found objects or sites by cultural heritage experts; to identify and implement actions consistent with the requirements of WB ESS8 and national law; and to train project personnel and project workers on chance find procedures.

The Chance Find Procedure aims to: (i) Protect physical cultural resources from the adverse impacts of physical investment activities and support their preservation, (ii) Promote the equitable sharing of benefits from the use of Physical Cultural Resources; and (iii) Raise awareness of all construction workers and management on site regarding the potential for accidental discovery of cultural heritage resources.

This Chance Find Procedure therefore intends to provide CNED and their contractors with an appropriate response in accordance with the relevant national legislation and international good practice. As such, all contracts for civil works will include this Chance Find Procedure.

In order for the Chance Find Procedure to be effective, the site manager must ensure that all personnel on the proposed development site understand the Chance Find Procedure and the importance of adhering to it if cultural heritage resources are encountered. In addition, training or induction on cultural heritage resources that might potentially be found on site should be provided by CNED.

### **Description of the procedure**

The procedure describe that should be followed if cultural resources are discovered when undertaking small-scale construction activities, civil works and/or renovation activities.

Prior to project implementation, CNED is responsible for siting and designing project activities to avoid significant adverse impacts to cultural heritage. The environmental and social risks and impacts identification process at the screening stage should help determine whether the proposed location of a project is in areas where cultural heritage is expected to be found, either during construction or operations. In such cases, in line with ESMF, CNED will develop provisions for managing chance finds through a chance find procedure which will be applied in the event that cultural heritage is subsequently discovered. CNED and construction contractors will make sure not to disturb any chance find further until an assessment by competent professionals is made. Where necessary, this will include national qualified experts from the Ministry of Culture and the National Archaeological Agency and civil society organisations, as well as traditional knowledge holders and other people from the area who should be consulted on whether disclosure of information is desirable, since there are situations in which disclosure may compromise the safety or integrity of the cultural heritage in question and/or endanger the sources of information.

## **Moldova Energy Efficiency Revolving Mechanism (MEERM)**

### ***Environmental and Social Management Framework***

#### **Procedures for accidental discovery of cultural resources (chance finds)**

This Chance Finds Procedure covers the actions to be taken from the discovering of a heritage site or item to its investigation and assessment by a professional archaeologist or other appropriately qualified person to its rescue or salvage.

If cultural resources (e.g. archaeological sites, historical sites, remains, objects, graveyards or individual graves) are discovered when undertaking small-scale construction activities, civil works and/or renovation activities, the following procedure will be executed:

1. Halt the construction activities around the chance find to avoid any (or further) damage;
2. Report the discovery to your supervisor or the Environmental Control Officer (or project equivalent) immediately;
3. Delineate and fence the discovered site or area and provide a 25 meters buffer zone around all sides of the find;
4. Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard will be arranged until the responsible local authorities or the Ministry of Culture, or the National Archaeological Agency (NAA), if available, can take over;
5. Forbid any removal of the objects by the workers or other parties;
6. Note the type of archaeological materials you think you have encountered, their location (GPS) and if possible, the depth below the surface the find occurred;
7. Photograph the exposed materials, preferably with a scale (e.g. a file binder, coin, ruler etc.);
8. Notify the Ministry of Culture and the National Archaeological Agency responsible for national tangible and intangible heritage immediately (within 24 hours or less);
9. Responsible local authorities would oversee protecting and preserving the site before deciding on subsequent appropriate procedures. This would require a preliminary evaluation of the findings to be performed by the National Archaeological Agency. The significance and importance of the findings should be assessed according to the various criteria relevant to cultural heritage; these include the aesthetic, historic, scientific or research, social, and economic values;
10. Decisions on how to handle the finding shall be taken by the responsible authorities. This could include changes in the physical investment layout (such as when finding an irremovable remain of cultural or archaeological importance) conservation, preservation, restoration, and/or salvage;
11. Implementation for the authority decision concerning the management of the finding shall be communicated in writing by relevant local authorities;
12. The mitigation measures could include the change of proposed Project design/ layout, protection, conservation, restoration, and/or preservation of the sites and/or objects;
13. Construction work at the site could resume only after permission is given from the responsible local authorities concerning safeguard of the heritage; and
14. The physical investment proponent is responsible for cooperating with the relevant local authorities to monitor all construction activities and ensure that the adequate preservation actions are taken and hence the heritage sites protected.
15. In addition, CNED is obliged to declare the chance find discovery at the earliest possible date to the Ministry of Culture and the national Archaeology Agency.

#### **References**

1. World Bank's Environmental and Social Standard2 - Labor and Working Conditions;
2. World Bank's Guidance Note for Borrowers on Environmental and Social Standard2 - Labor and Working Conditions (<https://documents1.worldbank.org/curated/en/149761530216793411/ESF-Guidancehttps://documents1.worldbank.org/curated/en/149761530216793411/ESF-Guidance-Note-2-Labor-and-Working-Conditions-English.pdf>);

**Moldova Energy Efficiency Revolving Mechanism (MEERM)**  
***Environmental and Social Management Framework***

3. World Bank's Good Practice Note - Environment & Social Framework for IPF Operations – Road safety;
4. World Bank's Good Practice Note - Environment & Social Framework for IPF Operations Assessing and Managing the Risks of Adverse Impacts on Communities from ProjectRelated Labor Influx;
5. World Bank's Concept Note on a proposed loan in the amount of \$55.0 million to the Republic of Moldova for an Agriculture Governance, Growth and Resilience Investment Project (P170035);
6. Labor Code of the Republic of Moldova no. 154/2003, modified in August and September of year 2022;
7. Law on Occupational Health and Safety no. 186/2008;
8. Law No. 5 of 09-02-2006 regarding ensuring equal opportunities between women and men;
9. Government Decision no. 80 of February 9, 2012 regarding the minimum safety and health requirements for temporary or mobile construction sites.

**Annex 9. Template for Temporary Relocation Plan**

**Abbreviations**

CNED	National Center for Sustainable Energy
EHSG	Environmental, Health, and Safety Guidelines
ESMF	Environmental and Social Management Framework
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
GBV	Gender Based Violence
GRM	Grievance Redress Mechanism
LPAs	Local Public Authorities
MoE	Ministry of Energy
NGO	Non-governmental organization
OIPs	Other Interested Parties
PAP	Project Affected Parties / Persons
PIU	Project Implementation Unit
SEP	Stakeholder Engagement Plan
TRP	Temporary Relocation Plan
WB	World Bank

**Introduction:**

This document is a template for Temporary Relocation Plan (TRP) for related sub-activities under the Moldova Energy Efficiency Revolving Mechanism (MEERM) project.

This Temporary Relocation Plan has been prepared in accordance with the principles and requirements of the World Bank Environmental and Social Framework (ESF). Its primary aim is to ensure the health, safety, and well-being of staff, stakeholders, and affected communities during the temporary relocation of office buildings or in response to service disruptions.

In the context of ESF’s Environmental and Social Standards—particularly ESS1 (Assessment and Management of Environmental and Social Risks and Impacts) and ESS4 (Community Health and Safety)—this plan outlines measures to minimize adverse impacts, maintain continuity of essential services, and uphold transparency and stakeholder engagement during relocation events.

This plan provides a structured approach to:

- Ensure safe working conditions and alternative facilities for staff,
- Protect service access for project beneficiaries and vulnerable groups,
- Mitigate environmental and social risks during the transition period,
- Communicate clearly with all relevant stakeholders.

**Moldova Energy Efficiency Revolving Mechanism (MEERM)**  
***Environmental and Social Management Framework***

By integrating risk management and safety considerations into relocation planning, this document supports compliance with World Bank ESF requirements/

The TRP is being prepared by Project Implementation Unit (PIU) within National Center for Sustainable Energy (CNED), in consultation with project stakeholders.

The present TRP is a working document, which will be updated as further information is gained during planning, implementation and further consultations.

**Section I. Objectives and Scope**

- Purpose of relocation
- Project components /Facilities/services affected (inserted captures and plans for affected parts of buildings/ entries, etc)
- Full or partial relocation
  - *Describe efforts made to minimize displacement and the results of these efforts*
- Participation and Consultations with stakeholders

**Section III. Institutional Arrangements / Roles and Responsibilities**

*Describe the institution(s) responsible for delivery of each item/activity in the entitlement policy; implementation of TRP and coordination of the activities associated with it*

- *Describe mechanisms for ensuring independent monitoring, evaluation, and financial audit of the TRP and for ensuring that corrective measures are carried out in a timely fashion.*
- PIU/CNED
- Service agency/facility management
- Contractor

**Section IV Assessment of Service Needs**

- Essential vs. non-essential services
- User volume and vulnerable groups
- Operational dependencies (utilities, IT, equipment)

**Section V. Identification of Temporary Locations**

- Selection criteria
- Assessment of options and justification

**Section VI. Relocation Logistics**

*Selection and Preparation of the Resettlement Site*

*Influx Management*

*Relocation Schedule and Assistance*

*Replacement of Services*

*Treatment of Cultural Property*

*Special Assistance for Women, Persons with Disabilities and Vulnerable Groups*

*Transfer of equipment, records, and materials*

*Utility/setup requirements*

**Section VII. Continuity of Operations**

- Minimum service package
- Staffing arrangements

**Moldova Energy Efficiency Revolving Mechanism (MEERM)**  
***Environmental and Social Management Framework***

- Contingency measures

**Section VIII. Environmental, Health & Safety Measures**

- Safe separation of works and users
- Access and traffic management
- Emergency preparedness

**Section IX. Communication and GRM**

- Information disclosure to staff and users / PAP, interested parties
- Signage and access instructions
- GRM integration

*Describe the step-by-step process for registering and addressing grievances and provide specific details regarding a cost-free process for registering complaints, response time, and communication modes.*

*Describe the mechanism for appeal.*

**Section X. Budget and Monitoring**

- Costing of relocation activities
- Monitoring during relocation
- Lessons learned

## **Annex 10. ESMF Public consultation report**

**Date:** 17 December 2025

**Location:** Ministry of Energy conference room (str. Ștefan cel Mare și Sfânt 134, Chișinău, 3rd floor)

**Format:** hybrid

### **Event scope and objectives:**

The public consultation event was organized to present and consult the major findings of the ESMF and discuss the potential the recommendations and actions to be considered under the project.

The event was opened by *Mrs. Carolina Novac, State Secretary of the Ministry of Energy*, who has outlined the importance of the continuous development partners and donors support the Republic of Moldova in Energy Efficiency Program in Public Buildings. She mentioned that the project builds upon the results of World Bank “Sustainable Transition Through Energy Efficiency Project in Moldova (STEEM<sup>22</sup>)” and the other initiatives, implemented by the Ministry of Energy and subordinated institutions for the last years. She greeted all the participants of the event and mentioned the importance of the feedback and recommendations from all the interested stakeholders.

The event was structured in thematic presentations and Q&A session, based on agenda (below)

### **AGENDA**

<i>Time</i>	<i>Subject</i>
09.45-10.00	Registration of participants / online connection
10.00-10.15	<b>Opening remarks</b> <i>Carolina Novac, State Secretary, Ministry of Energy</i> <i>Ion Muntean, Director PI CNED</i>
10.15-10.30	<i>General presentation of project</i>
10.30-11.30	Presentation of the environmental and social framework of the project <i>Iordanca-Rodica Iordanov, expert</i> <i>Tatiana Echim, expert</i>
11.30-12.30	Discussions, recommendations

### **Participants:**

The event was organized in a hybrid format with combined physical and online participation of the participants. In total, **38 participants (16 in room and 22 online) attended the event**. The profile of participants included representatives of central public authorities and line ministries (Ministry of Energy, Ministry of Social Protection and Labor, Ministry of Economic Development and Digitalization, Ministry of Health, Ministry of Energy, Ministry of Environment, National Social Insurance House (CNAS) General Inspectorate of Police of the Ministry of Internal Affairs, General Inspectorate for Emergency Situations – (IGSU), Environmental Agency, Chamber of Industry and Commerce of Moldova, Trade Union Association,

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<sup>22</sup> The project’s name was changed to Moldova Energy Efficiency Revolving Mechanism after the consultations, but original references are preserved in the consultation report.

## **Moldova Energy Efficiency Revolving Mechanism (MEERM)**

### ***Environmental and Social Management Framework***

Moldova Energy Projects Implementation Unit (MEPIU), representatives of the Central Public building administration, energy experts.

### **Summary of presentations:**

#### **General presentation of project – Ion Muntean, Director, Public Institution National Center for Sustainable Energy (CNED)**

An overview of general information regarding the project was presented by Mr. Muntean, Director, PI CNED, pointing out the major components and envisaged activities and proposed implementation arrangements and terms. More specifically, Mr. Muntean has outlined the proposed eligibility criteria for selection of public buildings owned by Central Public Authorities subject to retrofit along with the specific measures for each subproject that will be determined based on professional energy audits and designs.

At the same time, Mr. Muntean has outlined to participants that the proposed project would support the establishment and operationalization of an Energy Efficiency Revolving Fund (EERF) to finance energy efficiency in public buildings, with CNED acting as the Implementing public institution. The project will establish a revolving mechanism that enables public buildings to benefit from energy-efficient renovations in a financially sustainable way. The savings generated from these energy efficiency upgrades will be reused to scale up the program and expand its coverage to target other buildings. The normative framework for EERF including the financial mechanisms shall be defined at a more advance level of project implementation, as a part of Component 1 of the project.

#### **Presentation of the environmental and social management framework of project - Iordanca-Rodica Iordanov, expert, Tatiana Echim, expert**

The presentation of the Environmental and Social Management Framework (ESMF) included an overview and explanation of the document contents, the summary of which had been disseminated to participants in advance for familiarization. The presentation outlined the major potential environmental and social risks and impacts associated with the project and proposed corresponding mitigation measures.

At the outset, the general World Bank Environment and Social Framework (ESF), along with the relevant Environmental and Social Standard (ESS) and applicable legal and regulatory frameworks pertinent to the project, were presented to the participants. It was also explicitly noted that the overall environmental and social risks of the project have been assessed as *Low to Moderate*.

Detailed information on the anticipated risks and the mitigation strategies proposed under the project was presented and brought to the attention of the participants. Subsequently, the importance of stakeholder engagement, reflected within the Stakeholder Engagement Plan was highlighted, with particular emphasis on the project's focus on specific project affected parties, other interested groups and vulnerable categories of stakeholders.

The presentation concluded with an overview of the Grievance Redress Mechanism, which CNED will manage in its capacity as the project's implementing institution.

#### **Presentation of the Stakeholder Engagement Plan (SEP) and the Grievance Redress Mechanism (GRM) within project - Tatiana Echim, expert**

**Moldova Energy Efficiency Revolving Mechanism (MEERM)**  
*Environmental and Social Management Framework*

Based on the World Bank requirements, the draft **Stakeholder Engagement Plan (SEP)** has been developed for project. The SEP describes the timing and methods of engagement with stakeholders throughout the life cycle of the project, distinguishing between project-affected parties and other interested parties. The SEP also describes the range and timing of information to be communicated to project-affected parties and other interested parties, as well as the type of information to be sought from them. CNED will monitor the SEP implementation in accordance with the requirements of the WB ESF and will ensure the collection of information for regular project reporting.

**Grievance Redress Mechanism** under project will be available for project stakeholders and other interested parties to submit questions, comments, suggestions and/or complaints, or provide any form of feedback on all project-funded activities.

*GRM's users:* Project beneficiaries, project workers, identified project affected parties, as well as the broader citizens can use the GRM related to project activities.

*GRM's management:* The GRM for Project will be managed by the CNED, all contact information was provided to participants' consultations.

### Questions and Answers

Next to all the thematic presentations, the Q&A session was conducted to get the feedback and recommendations from participants.

**Q1: To which extend the ESMF document integrates the climate change considerations and how do you plan to estimate risks associated with this process, including relevant calculations for retrofit buildings?**

**A1:** The ESMF for the present Project does not include a standalone or explicit climate change assessment, nor does it elaborate a dedicated ESS specifically addressing climate change risks and adaptation. Climate change is therefore not directly evaluated as a separate thematic risk area within the ESMF.

Instead, climate change considerations are integrated indirectly and implicitly through the Project's core focus on energy efficiency and renewable energy investments in public buildings, which constitute the primary pathway through which climate mitigation benefits are achieved under project.

In particular, the Project Development Objective and performance indicators emphasize:

- Projected lifetime energy savings from energy efficiency investments, and
- Reductions in greenhouse gas (GHG) emissions associated with heating in public buildings, which are treated as key development and environmental outcomes of the project.

From a risk-estimation and technical perspective, climate-related considerations are operationalized through the energy efficiency assessment process, rather than through climate vulnerability or resilience modeling.

For each retrofit intervention, risks and impacts are estimated based on:

- Professional energy audits, which establish baseline and post-retrofit energy consumption;
- Standardized methodologies for calculating energy demand, energy savings (kWh/m<sup>2</sup>), and emission reductions, in line with national building energy performance regulations; and

## **Moldova Energy Efficiency Revolving Mechanism (MEERM)**

### ***Environmental and Social Management Framework***

- Comparative calculations between the “normative demand baseline” and expected post-renovation performance, which quantify reductions in energy use and associated emissions resulting from building envelope upgrades, system replacement, and renewable energy integration.

For retrofit buildings, climate-related impacts are therefore addressed through mitigation logic—namely by reducing energy consumption, fossil fuel dependency, and emissions—rather than through explicit climate risk screening (e.g. exposure to extreme weather, overheating, or long-term climate resilience). The ESMF assumes that improved building insulation, modernized heating systems, heat pumps, and rooftop solar PV contribute to both climate mitigation and improved indoor comfort, without introducing new climate-specific risks beyond those already covered under ESS1 and ESS3 (resource efficiency and pollution prevention).

In summary, while climate change is not treated as a separate safeguard or analytical pillar within the ESMF, it is indirectly mainstreamed through the project’s energy efficiency and renewable energy interventions, with risk estimation and performance calculations grounded in energy audits, building performance methodologies, and emission reduction metrics. Further elaboration of climate adaptation or resilience considerations could be addressed at a later stage, should the World Bank require a more explicit climate risk screening or alignment with emerging climate-related ESS guidance.

**Q2: One of the major risks associated particularly with roofing is connected with Asbestos waste management. Within the previous projects, due to the lack of special municipal waste infrastructure, the asbestos waste had to be stored temporary at buildings territory. What are the risks and options considered by project?**

**A2:** One of the major environmental and occupational health risks associated with roofing rehabilitation under energy efficiency projects is the potential presence and handling of asbestos-containing materials (ACMs), particularly in buildings constructed between 1950 and 2005. Improper handling, storage, or disposal of asbestos waste poses significant risks to workers, building occupants, and surrounding communities due to exposure to airborne fibers.

Under previous energy efficiency projects, this risk was compounded by the limited availability of licensed municipal infrastructure for disposing of asbestos waste, which in some cases necessitated temporary on-site storage of asbestos waste within building premises. Such practices increased the likelihood of accidental exposure, inadequate containment, and extended storage periods, especially in densely populated or operational public buildings.

The present Project explicitly acknowledges these risks and addresses them through a combination of risk prevention, procedural controls, and institutional arrangements, as reflected in the ESMF.

Key risks identified include:

- Occupational exposure of workers during roofing dismantling and removal works;
- Secondary exposure of building users and nearby communities due to fiber release;
- Environmental contamination resulting from improper temporary storage or transport;
- Non-compliance with national OHS and environmental legislation and World Bank ESS2 and ESS3 requirements.

Options and mitigation measures considered under project include:

1. Mandatory asbestos screening before work. All subprojects involving roofing or demolition activities are subject to mandatory screening for asbestos during the environmental and social

**Moldova Energy Efficiency Revolving Mechanism (MEERM)**  
***Environmental and Social Management Framework***

screening phase. Where ACMs are identified or suspected, asbestos-specific procedures apply, as detailed in Annex 6 of the ESMF.

2. Specialized handling and removal procedures. Asbestos removal must be carried out exclusively by trained contractors, using approved containment, wet removal methods, PPE, and controlled dismantling techniques, in accordance with national legislation and GIIP.
3. Minimization of on-site temporary storage. Unlike previous projects, the present one prioritizes the avoidance or strict limitation of on-site asbestos waste storage. Where temporary storage is unavoidable, it must be: strictly time-limited, carried out in sealed, labeled containers, located in secured and restricted areas, and supervised by CNED and the supervision consultant.
4. Use of authorized waste management facilities. Importantly, the project takes into account recent institutional developments. The Chişinău Municipality has entered into an agreement with a private company authorized to collect, transport, and store construction waste, including hazardous fractions. This arrangement significantly reduces reliance on temporary on-site storage and provides a viable disposal pathway for asbestos waste generated in the capital city.

In conclusion, while asbestos waste management remains a material risk for roofing rehabilitation works, the Project incorporates strengthened procedural safeguards, clearer disposal pathways, and improved institutional coordination, including the use of authorized private waste storage facilities in Chişinău. These measures substantially reduce the risks observed in previous projects and align asbestos management with national legislation and World Bank ESS.

**Q3. What other hazardous waste fractions have you considered as potential risks and what are the proposed actions within the ESMF? Can mercury containing waste from lighting equipment be also included under the potential risks?**

**A3: At this stage, it is planned that that the present project shall include the following retrofit operations** (i) thermal insulating of wall and roof, replacing windows and doors, renovation of internal heating system and changing the individual heat point, and replacement of lighting, etc. While analysing the spectrum of hazardous waste, that can be potentially generated it was mainly referring to asbestos, hazardous waste from vanish and paints from dismantling of the old windows that could possibly contain some heavy metals, waste electric and electronic equipment (that according the Extended Producer Responsibility has to be taken back by the operator that will install the new equipment).

Since major change of lightning in public buildings was undertaken about 10 years ago, the project team didn't receive any preliminary information on potential containing of mercury within the lighting or any measuring equipment, yet, based on this suggestion it shall be added to ESMF risks and mitigation measures. In addition, special provisions and acts related to manipulation with the Ozone Depleting substances (F-gases, or other ODS) are included in the ESMF.

**Q4. How shall the project secure that newly installed lighting equipment will have the requested quality and guarantee period?**

**A4.** The tender/ procurement dossier shall include all the necessary quality and technical parameters, including at least 2 year guarantee period for lighting equipment.

**Q5. How shall the project select and endorse the final list of the public buildings, owned by central public authorities?**

## **Moldova Energy Efficiency Revolving Mechanism (MEERM)**

### ***Environmental and Social Management Framework***

**A5.** The final procedure for selection of the buildings that will benefit of retrofit within the project shall be further coordinated with the donor. It is expected, that when finalized, the list and measures along with other relevant procedures and information shall be reflected within the special Governmental Decision, as one of the options, since the similar normative practice has already been applied in case of other public buildings renovation programs. However other legal procedures might be as well applied based on consultations with Ministry of Energy and the donor.

**Q6: Can the building of the Government of the Republic of Moldova benefit of project financing? Since its current technical and infrastructure condition requires immediate intervention? Can at least an updated energy and technical assessment audit be conducted?**

**A6:** Energy authorities are aware of need on upgrading of the Governmental building, that has been brought to the attention of the responsible authorities on various occasions. Within the current project initiative, the rehabilitation or retrofitting of this building wasn't included in the project activities.

**Q7. Since the project envisage activities that could potentially affect the workers of the buildings, indeed it is very important to coordinate when needed activities with trade unions.**

**A7.** The project included the trade unions and professional organization within the main interested parties to work with, along with various communication and information activities.

### **List of participants**

#### **List of participants in the room:**

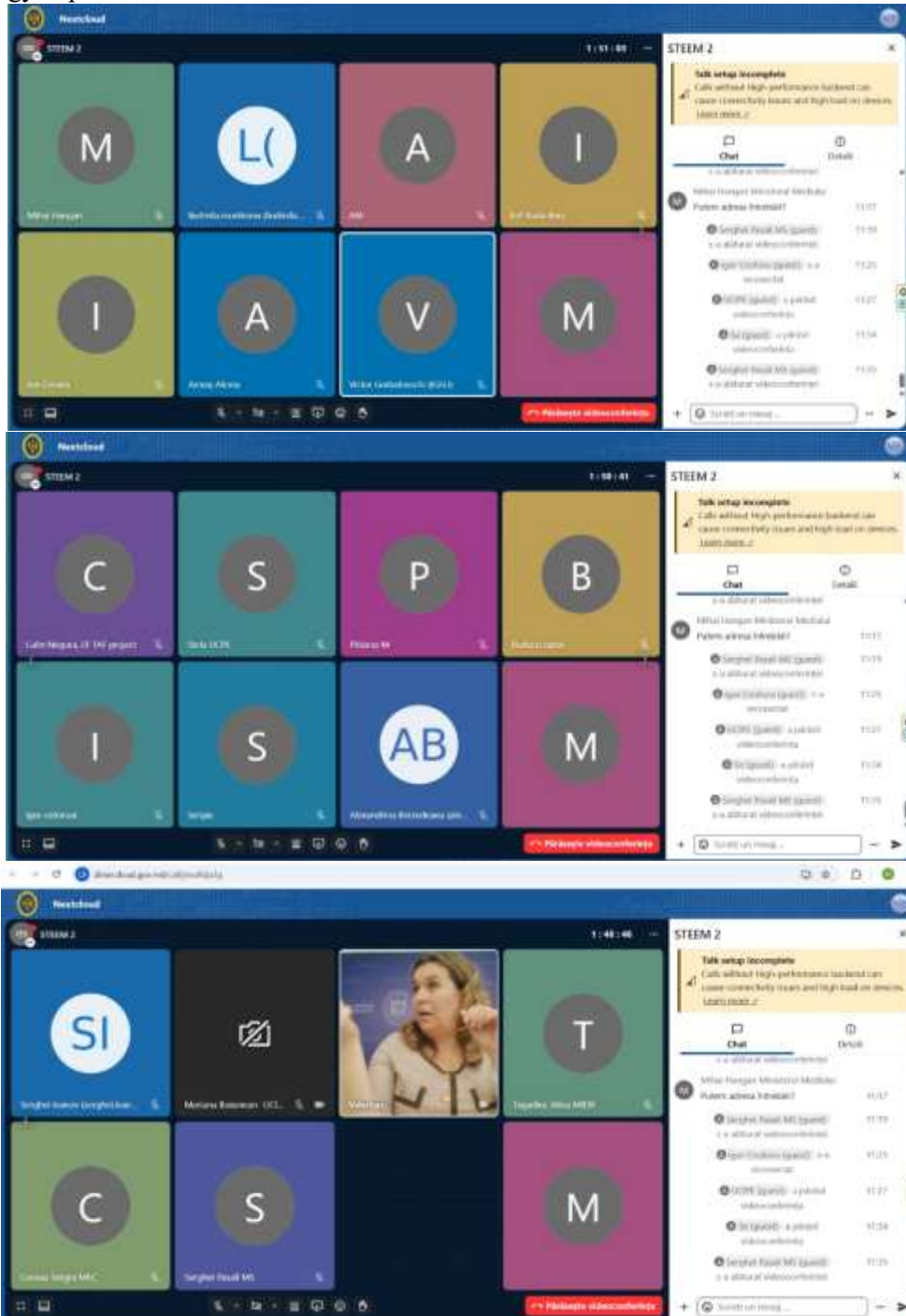
<b>INSTITUTION</b>
Ministry of Energy
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Ministry of Energy
Ministry of Energy
CNED
CNED
CNED
Agency of material reserve
CNAS – National Social Insurance House
112 Emergency Service
PI General Directorate for Administration of Government Buildings of the Republic of Moldova
PI General Directorate for Administration of Government Buildings of the Republic of Moldova
Expert for ESMF elaboration
Expert for ESMF elaboration

#### **Participants online:**

- Ministry of Social Protection and Labour,
- Ministry of Economic Development and Digitalization,
- Ministry of Health,
- Ministry of Energy,

**Moldova Energy Efficiency Revolving Mechanism (MEERM)  
Environmental and Social Management Framework**

- Ministry of Environment,
- General Inspectorate of Police of the Ministry of Internal Affairs,
- General Inspectorate for Emergency Situations – IGSU al MAI,
- Environmental Agency,
- Chamber of Industry and Commerce of Moldova,
- Trade Union Association,
- UCIPE,
- energy experts



**Moldova Energy Efficiency Revolving Mechanism (MEERM)**  
*Environmental and Social Management Framework*

**Photo documentary**

