MINISTRY OF FINANCE OF UKRAINE

PROJECT "STRENGTHENING GOVERNMENT CAPACITY FOR FISCAL REFORM IMPLEMENTATION"

E-WASTE MANAGEMENT PLAN

2026

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ABBREVIATIONS AND ACRONYMS

Abbreviation / Acronym	Full Name
Bank / World Bank	International Bank for Reconstruction and Development and the International Development Association, acting as administrator of the URTF
CMU	Cabinet of Ministers of Ukraine
C-ESMP	Contractor's Environmental and Social Management Plan
E-waste	Electronic waste / waste electrical and electronic equipment (WEEE)
EEE	Electrical and Electronic Equipment
EHS Guidelines	World Bank Environmental, Health and Safety Guidelines
EPEAT	Electronic Product Environmental Assessment Tool
ESCP	Environmental and Social Commitment Plan
ESMP	Environmental and Social Management Plan
ESS 3	World Bank Environmental and Social Standard 3 "Resource Efficiency and Pollution Prevention and Management"
GIIP	Good International Industry Practice
Grant Agreement	Grant Agreement No. TF0D0773 between Ukraine and IBRD/IDA signed on May 11, 2026
IT Equipment	Electrical and electronic equipment (EEE) in the context of this Plan
MoF	Ministry of Finance of Ukraine
POM	Project Operational Manual
PIU	Project Implementation Unit
PFM	Public Financial Management
Project	Additional Financing to the Project "Strengthening Government Capacity for Fiscal Reform Implementation" (Grant Agreement No. TF0D0773)
SOC	Security Operations Center
STEP	Systematic Tracking of Exchanges in Procurement (World Bank procurement planning and tracking system)
URTF	Ukraine Relief, Recovery, Reconstruction and Reform Trust Fund
WMP	Waste Management Plan
WEEE	Waste Electrical and Electronic Equipment (EU Directive 2012/19/EU)

1. INTRODUCTION

1.1. Project Background

The Ministry of Finance of Ukraine (hereinafter — MoF) has received additional financing from the International Bank for Reconstruction and Development and the International Development Association (hereinafter — the Bank or World Bank), acting as administrator of the Ukraine Relief, Recovery, Reconstruction and Reform Trust Fund (URTF), for the implementation of the Additional Financing to the Project "Strengthening Government Capacity for Fiscal Reform Implementation" (hereinafter — the Project) pursuant to Grant Agreement No. TF0D0773, signed on May 11, 2026 (hereinafter — the Grant Agreement). The total grant amount is USD 30,000,000. The Project closing date is December 31, 2028.

The Project comprises six components. In the context of this Plan, particular relevance attaches to Component 4 "PFM System Integration and Modernization," which provides, inter alia, for the establishment of a Security Operations Center (SOC) at the MoF premises, including renovation works, procurement and installation of IT equipment, as well as support for cloud foundations, cybersecurity and systems resilience. Implementation of these activities is associated with the potential generation of e-waste arising from the procurement, installation and subsequent decommissioning of the relevant equipment.

1.2. Purpose and Scope of this Plan

This E-Waste Management Plan (hereinafter — the Plan or EWMP) has been developed by the MoF in fulfillment of the requirements of the Environmental and Social Commitment Plan (ESCP) for the Project, specifically paragraphs 1.1 and 3.1 thereof, and in accordance with the provisions of Section 5 of the Project Operational Manual (POM). In accordance with paragraph 3.1 of the ESCP, this Plan includes an annex — a Waste Management Plan (WMP). The WMP covers non-electronic waste to be generated during the renovation works at the SOC premises (construction and demolition waste, packaging, etc.), as well as waste that may be identified at these premises prior to the commencement of works. Since the scope of the renovation works has not been determined at the time of preparation of this Plan, the WMP is presented in Annex 3 as a framework setting out the content and key requirements of the future WMP. A full site-specific WMP will be prepared as part of the ESMP for the renovation works at the SOC premises (ESCP, paragraph 1.1) once the scope of works has been determined and prior to the commencement of the bidding process for these works.

The purpose of the Plan is to ensure the sound management of e-waste generated throughout the entire lifecycle of IT equipment under the Project — from procurement and installation through to decommissioning and disposal — with a view to minimizing adverse impacts on the environment and human health.

At the time of preparation of this Plan, the specific list of equipment to be procured under the Project has not yet been determined. Accordingly, this Plan sets out general requirements and procedures for e-waste management that will apply to all categories of equipment to be procured. **Upon finalization of the equipment list, this Plan shall be subject to mandatory updating** to reflect the specific waste characteristics, estimated quantities, and refined management measures.

2. E-WASTE: DEFINITIONS AND HAZARD CHARACTERISTICS

2.1. Definition of E-Waste and Scope of Application in the Context of the Project

E-waste is a general term encompassing all types of electrical and electronic equipment (EEE) and its components that have been discarded, have become unfit for repair, or have reached the end of their useful life.

In the context of this Plan, e-waste includes the following categories of equipment that may be procured under the Project: servers and server equipment; network equipment (switches, routers, firewalls); uninterruptible power supply (UPS) systems and their batteries; workstations, monitors and peripheral equipment; cabling infrastructure and related components. Should a decision be made to procure a diesel generator, its electronic components (control panels, batteries) will also fall within the scope of this Plan with respect to end-of-life waste management.

2.2. Hazardous Substances in E-Waste

Electrical and electronic equipment contains a variety of hazardous materials that pose risks to human health and the environment if not properly managed. Certain substances that are harmless in their natural state become hazardous compounds in the course of equipment manufacturing. Lead, mercury, cadmium and polybrominated flame retardants belong to the category of persistent bioaccumulative toxins (PBTs) — a hazardous class of chemical substances that persist in the environment and accumulate in living organisms, causing cancer, neurological disorders and reproductive impairments.

The main toxic substances found in e-waste are set out in Table 1.

Table 1. Hazardous Substances Found in E-Waste

Substance	Occurrence in E-Waste
Halogenated compounds	
PCBs (polychlorinated biphenyls)	Capacitors, transformers
TBBPA, PBBs, PBDEs (brominated flame retardants)	Flame-retardant coatings on plastics, cable insulation
CFCs (chlorofluorocarbons)	Cooling units, insulating foam
PVC (polyvinyl chloride)	Cable insulation
Heavy metals and other metals	
Arsenic	Light-emitting diodes
Barium	Cathode ray tubes (CRTs)
Beryllium	Power supply units
Cadmium	NiCd batteries, luminescent coatings, printer cartridges
Chromium VI	Data tapes, floppy disks
Lead	CRT screens, batteries, printed circuit boards

Lithium	Lithium batteries
Mercury	LCD backlight, fluorescent lamps, alkaline batteries
Nickel	NiCd and NiMH batteries
Rare earth elements (Yttrium, Europium)	Fluorescent coating of CRT screens
Zinc sulfide	Inner surface of CRT screens

Note. PVC is included in Table 1 because the renovation works at the SOC premises are expected to involve the removal of pre-existing cabling, the age and composition of which have not been established. Cabling procured under the Project will comply with the RoHS Directive and the REACH Regulation in accordance with paragraph 5.1 and is not classified as hazardous waste (waste code 17 04 11), whereas pre-existing cabling of unknown composition shall be classified under the mirror hazardous entry 17 04 10* unless laboratory test reports confirm the absence of hazardous properties and, where classified as hazardous, shall be managed in accordance with paragraphs 5.4 and 5.5 of this Plan.

3. LEGAL AND REGULATORY FRAMEWORK

3.1. Ukrainian Legislation

The legal regulation of e-waste management in Ukraine is primarily governed by the following legislative and regulatory instruments:

Law of Ukraine "On Waste Management" No. 2320-IX (adopted June 20, 2022; entered into force July 9, 2023) establishes the legal, organizational and economic framework for waste management in Ukraine. Provisions relevant to this Plan include, in particular: the waste management hierarchy; the classification of waste into hazardous and non-hazardous waste; requirements for separate collection; the limitation of the waste storage period to one year from the date of waste generation; and the licensing of hazardous waste management activities. At the time of preparation of this Plan, specific legislation on waste electrical and electronic equipment has not been adopted in Ukraine.

Resolution of the Cabinet of Ministers of Ukraine No. 1102 of October 20, 2023 "On Approval of the Procedure for Waste Classification and the National Waste List" establishes the procedure for the classification of waste and the waste codes.

National Waste Management Strategy of Ukraine until 2030, approved by Order of the Cabinet of Ministers of Ukraine No. 820-r of November 8, 2017, defines the strategic directions of state policy in the waste management sector in line with European approaches, including the requirements of Directive 2012/19/EU on Waste Electrical and Electronic Equipment (WEEE) and Directive 2006/66/EU on batteries and accumulators.

National Waste Management Plan until 2033, approved by Order of the Cabinet of Ministers of Ukraine No. 1353-r of December 27, 2024, contains an analysis of the current situation in the waste management sector, forecasts and strategic development directions for the next ten years, as well as instruments for achieving the stated objectives and mechanisms for monitoring their implementation.

Resolution of the Cabinet of Ministers of Ukraine No. 1314 of November 8, 2007 "On Approval of the Procedure for Writing Off State Property" (as amended) establishes the mechanism for writing off state-owned property, including IT equipment held on the balance sheet of state institutions.

International Conventions to which Ukraine is a party governing the management of hazardous waste, including e-waste: the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal (ratified by Ukraine in 1999); the Stockholm Convention on Persistent Organic Pollutants (ratified in 2007); the Minamata Convention on Mercury (acceded to in 2023).

3.2. World Bank Environmental and Social Standard 3 (ESS 3)

ESS 3 "Resource Efficiency and Pollution Prevention and Management" establishes requirements for efficient resource use and pollution prevention throughout the project lifecycle in accordance with Good International Industry Practice (GIIP). Pursuant to the ESCP for the Project and the POM, the MoF is obligated to develop and implement this Plan, with a framework Waste Management Plan annexed hereto (Annex 3), ensuring the sound management of e-waste at all stages of Project implementation. The Project will avoid the landfilling of e-waste by prioritizing reuse, recycling and recovery. Where reuse, recycling or recovery of e-waste is not feasible, treatment, neutralization or disposal shall be carried out in accordance with the Law of Ukraine "On Waste Management" and the National Waste Management Plan.

3.3. World Bank Environmental, Health and Safety Guidelines (EHS Guidelines)

The World Bank EHS Guidelines promote waste prevention, reuse and recycling, sound housekeeping and inventory control, and the implementation of procurement measures enabling the return of materials suitable for reuse. They require the segregation of hazardous waste from other waste streams, its proper storage in labeled containers, and the maintenance of relevant documentation.

3.4. Good International Industry Practice (GIIP)

Under GIIP, distributors of EEE are required to offer consumers take-back systems for e-waste. Enterprises and institutions that are EEE users — including public authorities — must ensure the separate collection and transfer of all e-waste for treatment and recycling by authorized organizations. GIIP also encourages the conclusion of contracts with suppliers that include equipment take-back arrangements and the preference for equipment with demonstrated environmental credentials.

4. IT EQUIPMENT UNDER THE PROJECT: SCOPE AND LIFECYCLE

4.1. Equipment Categories

Under Component 4 of the Project, IT equipment is to be procured and installed to support the operation of the MoF Security Operations Center (SOC), cloud infrastructure development, cybersecurity systems and data analytics. At the time of preparation of this Plan, the final equipment list has not been determined; however, it is expected to encompass the following categories:

Equipment Category	Examples
Server equipment	Physical servers, data storage systems
Network equipment	Switches, routers, firewalls, access points
Uninterruptible power supply systems	UPS units, batteries
Workstations and peripherals	Computers, monitors, keyboards, mice
Cabling infrastructure	Patch panels, cables, connectors
IT infrastructure cooling systems	Precision air-conditioning units, ventilation equipment

It should be noted separately that, should a decision be made to procure a diesel generator, its electronic components — in particular control panels and starter batteries — will fall within the scope of this Plan with respect to end-of-life waste management. This Plan does not govern the environmental impacts of the generator during its operational phase; those aspects are subject to separate treatment through an update to the ESMP.

4.2. Estimated Quantities and Timeline

Procurement of IT equipment under Component 4 of the Project will be carried out in accordance with the Project Procurement Plan, following the inclusion of the relevant procurement packages therein and their clearance by the World Bank through the STEP system. At the time of preparation of this Plan, the list and quantities of equipment have not been determined; therefore, a quantitative estimate of e-waste volumes is not possible. An indicative phased schedule of waste generation relative to the Project closing date (December 31, 2028) and a qualitative estimate of waste volumes are provided below.

Table 2. Indicative Waste Generation Schedule

Stage	Indicative period	Expected waste	Indicative volume estimate	Responsible party
Delivery and installation	Project implementation period, until December 31, 2028, in accordance with the Procurement Plan	Packaging materials, cable offcuts, equipment damaged during delivery; pre-existing cabling, lamps and other components removed from the installation area	Packaging waste proportional to the volume of deliveries; e-waste insignificant (isolated damaged units returned to the supplier)	Supplier / installation contractor (paragraph 5.2)

Operation during the Project period	From commissioning until December 31, 2028	Defective components	Insignificant; replacement by the supplier under warranty	Supplier (warranty); State Institution "Open Public Finance"
Decommissioning	After Project closure, in accordance with service life (Table 3)	Equipment of all categories listed in paragraph 4.1	To be determined by the quantity of equipment procured	State Institution "Open Public Finance"

Table 3. Indicative Service Life and Expected Decommissioning Period

Equipment category	Typical service life	Expected decommissioning period
Server equipment, data storage systems	5–7 years*	After Project closure
Network equipment	5–8 years*	After Project closure
UPS units (excluding batteries)	8–10 years*	After Project closure
UPS batteries	3–5 years (valve-regulated lead-acid, VRLA)*	After Project closure; the first battery replacement will constitute the earliest hazardous waste stream
Workstations and peripherals	4–6 years*	After Project closure
Cabling infrastructure	Over 15 years*	After Project closure
Cooling systems	10–15 years*	After Project closure

* Service life figures are indicative and based on typical practice; actual service life is determined by the manufacturer's technical documentation and decisions of the balance sheet holder.

Since procurement of the equipment is expected not earlier than 2027, no e-waste from equipment decommissioning is expected to be generated before Project closure, except for defective components replaced under warranty.

Quantitative estimates of e-waste volumes by category will be added to this Plan when it is updated following the determination of the equipment list and prior to the commencement of the bidding process (paragraph 1.2).

4.3. Lifecycle Stages Covered by this Plan

This Plan covers the following lifecycle stages of IT equipment under the Project:

Lifecycle Stage	Description
Procurement	Supplier requirements regarding environmental characteristics of equipment and the availability of take-back schemes
Installation	Management of packaging and transport waste (cardboard, plastic film, expanded polystyrene, pallets), cable and component offcuts, and equipment

	damaged in transit. Waste management requirements for this stage are set out in paragraph 5.2 of this Plan. The management of construction and demolition waste generated during the renovation works is governed by the WMP (Annex 3) and the ESMP for the renovation works.
Operation	Inventory management, maintenance, service life extension
Decommissioning	Secure data destruction, collection, storage and transfer of e-waste to organizations duly licensed to handle and recover or dispose of the relevant waste categories.

5. E-WASTE MANAGEMENT MEASURES

5.1. Procurement Stage

When procuring IT equipment under the Project, the MoF shall ensure that the following requirements and recommendations are included in the procurement documentation:

Mandatory requirements for suppliers:

- availability of warranty service throughout the warranty period, including the possibility of repair and replacement of defective components;
- supplier's readiness to accept decommissioned equipment upon expiry of its service life (take-back scheme) — where such arrangements are available on the market;
- provision of documentation on the material composition of the equipment, including a list of hazardous substances contained therein;
- compliance of products with the EU RoHS (Restriction of Hazardous Substances) Directive and the REACH Regulation.

Where supplier take-back of equipment is not possible, e-waste shall be transferred to entities entitled to carry out management operations for such waste, in accordance with the legislation of Ukraine in force at the time of write-off.

Recommendation on equipment selection: when evaluating procurement proposals, preference should be given to equipment with a longer standard service life and demonstrated environmental credentials (e.g., Energy Star, EPEAT or equivalent certification). The selection of equipment with a longer lifecycle enables the deferral of e-waste generation and reduces the total volume of e-waste arising over the course of Project implementation.

5.2. Installation Stage

During delivery and installation of IT equipment, the supplier and installation contractor shall implement measures to prevent waste generation, maximize reuse and recycling, and ensure the safe management of any electronic components or hazardous materials generated or identified during the works.

Before installation commences, the contractor shall identify the waste streams that may arise, including packaging materials, cable and component offcuts, surplus materials, equipment damaged during transportation or installation, and any pre-existing equipment, cabling, lamps, batteries or electronic components removed from the installation area.

The following requirements shall apply during installation:

- equipment shall be handled, transported and installed in accordance with the manufacturer's instructions to prevent avoidable damage and premature waste generation;
- reusable transport packaging, pallets, containers and protective materials shall be returned to the supplier or reused where practicable;
- cardboard, paper, plastic film, expanded polystyrene, timber, metals, cables and other installation waste shall be segregated at the point of generation and directed to reuse or recycling where technically and commercially feasible;

- cable and electronic component offcuts shall not be mixed with municipal waste and shall be collected separately for transfer to an appropriately authorized waste management organization;
- equipment or components damaged during delivery or installation shall be recorded and, where possible, returned to the supplier for repair, replacement or take-back under the applicable contractual and warranty arrangements;
- equipment or components that cannot be returned, repaired or reused and that meet the definition of waste shall be managed in accordance with the storage, transportation and disposal requirements of this Plan;
- pre-existing cabling shall be assessed before removal, taking account of its age, composition and available technical documentation. Newly procured RoHS- and REACH-compliant cabling shall not be presumed to be hazardous solely because it contains PVC. Pre-existing cabling whose composition is unknown or that is identified as containing hazardous substances shall be segregated and managed through an appropriately licensed contractor;
- fluorescent lamps, batteries and other components containing hazardous substances shall be removed carefully to prevent breakage, leakage or release of hazardous materials and shall be stored separately in suitable, closed and clearly labeled containers;
- damaged batteries, broken mercury-containing lamps or other leaking components shall be isolated immediately, and appropriate spill-response and emergency procedures shall be implemented;
- workers involved in installation and waste handling shall receive appropriate instruction on waste segregation, safe handling, spill response, fire prevention, emergency arrangements and the use of required PPE;
- waste shall be stored only in designated areas protected from unauthorized access, precipitation, moisture, mechanical damage and accidental mixing;
- open burning, uncontrolled dumping, burial, deliberate breakage or informal recovery of equipment, cabling, lamps, batteries, packaging or electronic components shall be prohibited;
- the contractor shall maintain records of installation waste, including the waste type, estimated quantity, temporary storage location, transfer date, receiving organization and applicable handover or disposal documentation; and
- following completion of installation, the contractor shall remove all waste and surplus materials from the work area and provide the PIU with documentation confirming their reuse, return, recycling, recovery or lawful disposal.

The requirements of this subsection shall be incorporated into the relevant procurement and contractual documents. Compliance shall be verified by the PIU Environmental and Social Specialist through site inspections, review of waste records and verification of supporting transfer documentation.

5.3. Inventory and Asset Tracking

IT equipment procured under the Project shall, upon its transfer to the balance sheet of the State Institution “Open Public Finance”, be accounted for by the State Institution “Open Public

Finance” in accordance with the legislation of Ukraine and its internal procedures and instructions, including through the maintenance of a register of such equipment throughout its entire service life.

5.4. Write-Off and E-Waste Storage

The write-off of IT equipment shall be carried out by the State Institution “Open Public Finance” as the balance sheet holder in accordance with the Procedure for Writing Off State Property approved by Resolution of the Cabinet of Ministers of Ukraine No. 1314 of November 8, 2007, as in force at the time of write-off. In accordance with the Procedure, only property that cannot be alienated, transferred free of charge to other entities or otherwise used is subject to write-off.

Following completion of the write-off procedure and the equipment acquiring the status of waste, its storage pending transfer to a licensed contractor shall comply with the following requirements:

- the storage area shall be clearly marked (“E-Waste / Electronic Waste”);
- equipment shall be stored in closed containers or on shelving, protected from mechanical damage and moisture. Every container must be clearly and legibly labeled with the specific type of waste it holds (e.g., *"Hazardous Waste: Spent AGM/Lead-Acid Batteries"* or *"Hazardous Waste: Mercury-Containing Components"*), the date it was placed in the container, and its hazardous characteristics (e.g., Toxic, Corrosive, Flammable);
- batteries and other components containing hazardous substances shall be stored separately from other equipment;
- access to the e-waste storage area shall be restricted to authorized personnel only;
- the storage area must have an **impermeable surface** to prevent leaching. Liquid-bearing components (like batteries) or components at risk of leaking must be placed inside **secondary containment** (bunding or catch trays) capable of holding 110% of the volume of the largest container or 25% of the total stored volume;
- The storage procedure should mandate regular visual inspections (typically weekly or bi-weekly). A log must be maintained confirming that inspectors checked for at least: signs of accidental chemical releases or corrosion; structural damage to containers or shelving, integrity of locks, boundary fences, and security devices;
- The storage facility must be equipped with localized emergency response tools: spill response kits appropriate for the types of hazards present (e.g., acid neutralizers for lead-acid battery storage), dedicated fire extinguishing equipment, accessible emergency eyewash stations or first aid kits nearby for personnel handling hazardous elements;
- Batteries, mercury-containing lamps, and other components containing distinct hazardous substances shall be stored separately from each other and general electronic scrap to prevent chemical reactions or cross-contamination;
- the storage period for e-waste shall not exceed one year from the date of generation, in accordance with the requirements of the Law of Ukraine “On Waste Management”.

5.5. Collection, Transportation and Disposal

E-waste shall be transferred for disposal exclusively through licensed contractors holding the relevant permits for hazardous waste management in accordance with Ukrainian legislation. The State Institution “Open Public Finance" shall ensure:

- conclusion of a contract with a licensed e-waste disposal contractor prior to the commencement of equipment decommissioning;
- contractor should have adequate technical capacity, safe transport vehicles, and an acceptable environmental track record, must provide an Emergency Response Plan for transit;
- vehicles of contractor must be equipped with spill kits, fire extinguishers, and drivers must be trained in hazardous material handling;
- proper documentation of each e-waste transfer operation, including a handover certificate, disposal certificate and transport documentation; contractor must return a signed copy of the manifest confirming receipt at the final licensed treatment or recycling facility within a specified timeframe;
- contractor should be obliged to provide mandatory immediate notification to the State Institution “Open Public Finance” and, during the Project implementation period, to the PIU of any accidental spills, fires, or environmental regulatory violations occurring during the collection or transportation of the e-waste;
- retention of all e-waste disposal documentation within the periods established by the legislation of Ukraine;
- priority shall be given to reuse and recycling options over landfilling.

5.6. Data Security Prior to Disposal

Prior to transferring any equipment for disposal or reuse, the State Institution “Open Public Finance" shall ensure the secure and non-recoverable destruction of all data stored on information storage media (hard drives, SSDs, flash memory, etc.) in accordance with Ukrainian legislation on information protection and the internal information security policies of the State Institution “Open Public Finance”. Data destruction shall be documented in accordance with the legislation of Ukraine and the internal procedures of the State Institution “Open Public Finance”.

5.7. Diesel Generator

At the time of preparation of this Plan, no decision has been taken regarding the procurement of a diesel generator to ensure the uninterrupted operation of the Security Operations Center. Should such a decision be made, the electronic components of the generator — in particular control panels and starter batteries — will fall within the scope of this Plan with respect to end-of-life waste management. These components shall be managed in accordance with the procedures set out in paragraphs 5.4 and 5.5 of this Plan.

This Plan shall be subject to updating in the event that a decision is made to procure a generator, with a view to specifying the composition of its electronic components and the corresponding waste management measures.

5.8. Personnel Instruction

Workers of the supplier and installation contractor involved in equipment installation shall receive instruction in accordance with paragraph 5.2.

The IT equipment supply contract shall provide for initial instruction by the supplier of the personnel of the State Institution “Open Public Finance” responsible for the operation of the equipment on the safe handling of the equipment and its components containing hazardous substances (in particular, batteries), as well as on the manufacturer’s requirements for their replacement and removal.

Prior to the commencement of equipment decommissioning, personnel of the State Institution “Open Public Finance” involved in the write-off, storage and transfer of e-waste shall receive instruction in accordance with the procedure established by the legislation of Ukraine in force at the time of write-off.

6. INSTITUTIONAL RESPONSIBILITIES

6.1. Ministry of Finance of Ukraine and the Project Implementation Unit

The MoF, as grant recipient and Project implementing entity, bears overall responsibility for ensuring the implementation of this Plan during the Project implementation period. In this regard, the MoF, through the PIU, shall ensure:

- inclusion of the requirements of this Plan in procurement documentation for IT equipment;
- monitoring of compliance with the Plan's requirements by contractors and suppliers;
- preparation and submission to the World Bank of progress reports on the implementation of this Plan as part of semi-annual Project progress reports;
- updating of this Plan following finalization of the equipment list, as well as in the event that a decision is made to procure a diesel generator;
- transfer to the State Institution "Open Public Finance" of the suppliers' technical documentation for the procured equipment and of this Plan no later than the Project closing date.

6.2. Environmental and Social Specialist of the PIU

Throughout the Project implementation period, the Environmental and Social Specialist of the PIU shall be responsible for the implementation of this Plan at the procurement, delivery and installation stages and shall carry out the following:

- verification that the requirements of this Plan are included in the procurement documentation and contracts for the supply and installation of IT equipment;
- oversight of waste management by suppliers and installation contractors during the delivery and installation of IT equipment in accordance with paragraph 5.2;
- preparation of the relevant section of semi-annual ESCP implementation reports.

6.3. State Institution "Open Public Finance"

The State Institution "Open Public Finance", as the balance sheet holder (the entity on whose balance sheet the assets are recorded) of IT equipment procured under the Project, bears responsibility for the implementation of the requirements of this Plan both during the Project implementation period and after its closure. Upon Project closure and the cessation of PIU operations, full responsibility for the implementation of all requirements of this Plan shall transfer to the State Institution "Open Public Finance" or its legal successor.

The State Institution "Open Public Finance" shall in particular ensure:

- accounting for the procured IT equipment, including maintenance of its register, in accordance with the legislation of Ukraine and its internal procedures and instructions;
- conduct of the equipment write-off procedure in accordance with the Procedure for Writing Off State Property (CMU Resolution No. 1314 of November 8, 2007), as in force at the time of write-off;
- secure and non-recoverable destruction of data on information storage media prior to transfer of equipment for disposal;
- conclusion of a contract with a licensed e-waste disposal contractor; and supervision of its performance;
- retention of all e-waste disposal documentation within the periods established by the legislation of Ukraine.

6.4. Contractors and Licensed Waste Management Organizations

E-waste shall be transferred for disposal exclusively to organizations holding the relevant licenses for hazardous waste management in accordance with Ukrainian legislation. Such organizations shall be required to:

- provide the MoF and the State Institution “Open Public Finance" with documentation confirming the receipt of e-waste (handover certificate);
- provide disposal certificates specifying the method and location of disposal;
- carry out the transportation of e-waste in accordance with the requirements of Ukrainian legislation and the World Bank EHS Guidelines;
- transport e-waste using specialized, secure vehicles equipped with emergency spill kits and fire suppression equipment, operated by adequately trained personnel.

7. MONITORING, REPORTING AND RECORD-KEEPING

7.1. Monitoring Matrix

Table 4. Monitoring Matrix

Potential Impact	Mitigation Measure	Monitoring Indicator	Responsible Party	Budget / Source of Financing
Environmental contamination from improper e-waste disposal	Transfer of e-waste exclusively to licensed disposal contractors	Availability of disposal certificates for each batch of e-waste transferred	State Institution «Open Public Finance»	Funds of the tate Institution Open Public inance»
Soil and water contamination from hazardous substances contained in equipment	Separate storage of components containing hazardous substances (batteries, accumulators, etc.)	Absence of storage requirement violations, as evidenced by periodic inspections	State Institution «Open Public Finance»	Funds of the State Institution «Open Public Finance»
Risk of confidential data leakage during disposal of storage media	Secure data destruction prior to transfer of equipment for disposal	Availability of data destruction acts for each unit of equipment containing storage media	State Institution «Open Public Finance»	Funds of the State Institution «Open Public Finance»
Premature e-waste generation due to rapid technological obsolescence	Preference at procurement stage for equipment with longer standard service life and demonstrated environmental credentials (Energy Star, EPEAT or equivalent certifications)	Share of procured equipment meeting environmental criteria in total procurement volume	MoF (E&S Specialist and Procurement Specialist, PIU)	No separate costs: requirements are included in the bidding documents; costs, if any, are included in the price of supply contracts (Grant funds)
Accumulation of e-waste beyond permissible storage periods	Timely transfer of e-waste to licensed contractors within periods not exceeding one year from the date of generation	Absence of cases of e-waste storage for more than one year	State Institution «Open Public Finance»	Funds of the State Institution «Open Public Finance»
Engagement of unlicensed disposal contractors	Verification of contractor licenses prior to conclusion of contract	Valid licenses held by all disposal contractors	State Institution «Open Public Finance»	No separate costs (administrative procedures of the State Institution «Open Public Finance»)

Improper management of waste generated during delivery and installation	Inclusion of the requirements of paragraph 5.2 in contracts; segregation and removal of waste by the supplier (installation contractor)	Availability of documents confirming the transfer of waste	Supplier / installation contractor; oversight — PIU	Included in the price of supply and installation contracts (Grant funds)
Supplier take-back not possible	Transfer of e-waste in accordance with paragraph 5.1	Availability of documents confirming the transfer of e-waste	State Institution «Open Public Finance»	Funds of the State Institution «Open Public Finance»
Insufficient awareness of personnel	Initial instruction of the State Institution «Open Public Finance» personnel by the supplier; instruction of personnel prior to decommissioning (paragraph 5.8)	Records of instruction conducted	Supplier; State Institution «Open Public Finance»	Included in the price of the supply contract (Grant funds); funds of the State Institution «Open Public Finance»

No separate cost estimates are provided: measures at the procurement, delivery and installation stages are financed within the price of the relevant contracts from Grant funds, while measures at the operation and decommissioning stages are financed from the funds of the State Institution “Open Public Finance” as the balance sheet holder of the equipment.

7.2. Reporting to the World Bank

Throughout the Project implementation period, the MoF, through the Environmental and Social Specialist of the PIU, shall include information on the implementation of this Plan in the semi-annual Project progress reports submitted to the World Bank. The relevant section of the report shall contain:

- information on the inclusion of the requirements of this Plan in the procurement documentation and contracts for the supply of IT equipment;
- information on the management of waste generated during the delivery and installation of equipment;
- consolidated statistics on **Occupational Health and Safety (OHS)** performance, including summary logs of personal protective equipment (PPE) compliance, near-misses, and safe work training sessions;
- summary data from the project **Grievance Redress Mechanism (GRM)** detailing any waste-related or community complaints received and their current resolution status;
- any deviations from the requirements of this Plan and corrective actions taken.

Information on the management of equipment at the operation and decommissioning stages shall be provided by the MoF or the State Institution “Open Public Finance” upon request of the World Bank.

7.3. Immediate Incident and Accident Notification

In the event of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers (e.g., fires at e-waste storage areas, electrolyte or acid spills, traffic accidents during e-waste transportation, or exposure to hazardous chemicals), the MoF, through the PIU, shall:

- promptly, and no later than 48 hours after learning of the incident or accident, notify the World Bank;
- provide sufficient details regarding the scope, severity and possible causes of the incident or accident, the immediate measures taken or planned to be taken to address it, and any information provided by the contractor and/or the State Institution "Open Public Finance", as appropriate;
- subsequently, at the World Bank's request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence, within a timeframe acceptable to the World Bank (ESCP, Section E).

7.4. Record-Keeping

Documentation relating to the accounting and write-off of equipment, data destruction and the transfer of e-waste for disposal shall be retained by the State Institution "Open Public Finance" (or its legal successor) within the periods established by the legislation of Ukraine. During Project implementation, the MoF (PIU) shall retain documentation relating to the procurement of equipment and the management of waste generated during its delivery and installation.

ANNEXES

Annex 1. Screening Tool and E-Waste Management Checklist

To be used in conjunction with the Law of Ukraine "On Waste Management" No. 2320-IX and the World Bank Environmental, Health and Safety Guidelines (EHS Guidelines).

Question	Yes	No	Notes	Recommended Action
1. General				
Is e-waste generation expected as a result of the procurement, installation or decommissioning of IT equipment under the Project?				If yes — apply all requirements of this Plan
Has the final list of equipment to be procured been determined?				If no — update this Plan once the list is determined
Has a decision been made to procure a diesel generator?				If yes — update this Plan pursuant to paragraph 5.7
2. Procurement				
Have environmental requirements for equipment been included in the procurement documentation?				If no — include pursuant to paragraph 5.1
Does the procurement documentation include a requirement for a take-back scheme for decommissioned equipment?				If no — include; if such an option is not available on the market — e-waste shall be transferred in accordance with paragraph 5.1
Has preference been given to equipment with a longer standard service life and demonstrated environmental credentials (Energy Star, EPEAT or equivalent)?				Recommendation pursuant to paragraph 5.1
3. Installation				
Have the types and estimated quantities of waste expected during equipment delivery and installation been identified?				If no, require the installation contractor to identify the anticipated waste streams and estimated quantities before installation commences.
Are packaging materials segregated by type and directed to reuse or recycling where technically and commercially feasible?				If no, provide designated containers or collection areas for cardboard, plastic film, expanded polystyrene, timber pallets and other packaging materials, and arrange reuse or recycling where feasible.

Are cable and component offcuts collected separately and protected from mixing with municipal waste?				If no, establish separate collection for cable, metal, plastic and electronic component offcuts and arrange their transfer to an appropriately authorized waste management organization.
Has pre-existing cabling been assessed before removal to determine whether it may contain hazardous substances?				If no, suspend removal where the composition is uncertain and arrange identification or characterization of the cabling. Manage any cabling classified as hazardous separately in accordance with Sections 5.4 and 5.5.
Is equipment damaged during delivery or installation recorded, segregated and returned to the supplier where possible?				If no, record the damaged equipment, prevent its uncontrolled disposal and arrange repair, replacement or supplier take-back. If it becomes waste, manage it in accordance with this Plan.
Are intact and damaged lamps, batteries and other hazardous components protected against breakage, leakage and mechanical damage?				If no, stop handling until suitable containers, secondary containment and safe handling arrangements are available.
Are installation workers informed about waste segregation, spill response, fire safety and applicable PPE requirements?				If no, provide task-specific instruction or toolbox training before the relevant activities continue and retain attendance records.
Are records maintained for waste generated and transferred during installation?				If no, record the waste type, estimated quantity, storage location, transfer date, receiving organization and supporting handover documentation.
Has the installation area been cleared of waste and surplus materials following completion of the works?				If no, require the contractor to remove all installation waste and surplus materials through approved reuse, recycling or disposal routes before acceptance of the completed works.
4. Decommissioning and Storage				
Is there any equipment to be decommissioned during the reporting period?				If yes — initiate write-off procedure pursuant to paragraph 5.4

Has the possibility of transferring obsolete but physically serviceable equipment to other state institutions been considered?				Pursuant to paragraph 5.4 and CMU Resolution No. 1314
Are separate e-waste storage requirements being met (labeling, isolation, restricted access, OHS, including PPE use and fire safety)?				If no — take measures pursuant to paragraph 5.4
Are the requirements for separate storage of incompatible components met?				If no, immediately segregate batteries, mercury-containing lamps, liquid-bearing components and other incompatible hazardous components; place them in designated, clearly labeled containers or storage areas; and verify compliance through a documented inspection pursuant to Section 5.4.
Are the spill prevention measures described in this Plan implemented?				If no, suspend handling of leaking or liquid-bearing components until an impermeable storage surface, suitable secondary containment and appropriate spill-response materials are provided. Clean up any release safely, document the incident and implement corrective measures pursuant to Section 5.4.
Are the storage and labeling requirements for different categories of hazardous waste complied with?				If no, separate the hazardous waste by category and compatibility and place it in suitable containers labeled with the waste type, date of placement, and relevant hazardous characteristics. Restrict access and record the corrective action in the storage inspection log pursuant to Section 5.4.
Does the e-waste storage period not exceed one year?				If no — immediately arrange transfer to licensed contractor
5. Collection, Transportation and Disposal				
Has a contract been concluded with a licensed e-waste disposal contractor?				If no — conclude prior to commencement of decommissioning

Has the validity of the contractor's license been verified?				If no — verify prior to contract conclusion
Does the contractor use specialized, secure transport vehicles equipped with emergency spill kits and fire suppression equipment, operated by adequately trained personnel?				If no, do not authorize the transfer of e-waste until the contractor provides documented evidence of suitable vehicles, emergency equipment, trained personnel and an emergency response procedure for transportation, in accordance with Sections 5.5 and 6.4.
Has data on all storage media been unrecoverably destroyed prior to transfer of equipment for disposal?				If no — carry out data destruction pursuant to paragraph 5.6
Has a handover certificate been received from the contractor?				If no — require from contractor
Has a disposal certificate been received from the contractor?				If no — require from contractor

Annex 2. Types of E-Waste Generated under the Project

The list is indicative and subject to revision upon finalization of the equipment list to be procured under the Project.

E-Waste Category	Examples	Hazardous Substances Present	Priority Management Option	Disposal Method
Server equipment	Physical servers, data storage systems, server chassis	Lead, mercury, beryllium, brominated flame retardants	Component reuse / recycling	Licensed disposal contractor
Network equipment	Switches, routers, firewalls, access points	Lead, brominated flame retardants, PVC	Reuse / recycling	Licensed disposal contractor
Uninterruptible power supply systems	UPS units	Lead, cadmium, lithium	Recycling	Licensed hazardous waste disposal contractor
Batteries and accumulators	Lead-acid, lithium-ion batteries	Sulfuric acid, lead, cadmium, lithium, nickel	Recycling	Licensed hazardous waste disposal contractor — separate collection mandatory
Workstations and monitors	Computers, monitors, thin clients	Lead, mercury, brominated flame retardants	Reuse / recycling	Licensed disposal contractor
Peripheral equipment	Keyboards, mice, webcams, scanners	Brominated flame retardants, PVC	Reuse / recycling	Licensed disposal contractor
Data storage media	Hard drives, SSDs, flash memory	Lead, beryllium, rare earth elements	Secure data destruction + recycling	Licensed disposal contractor — prior data destruction mandatory
Cabling infrastructure	Cables, patch panels, connectors	PVC, copper	Recycling	Licensed disposal contractor
Cooling systems	Precision air-conditioning units, ventilation equipment	CFCs, copper, aluminium	Recycling	Licensed disposal contractor — separate refrigerant disposal mandatory
Fluorescent lamps	Spent or removed fluorescent tubes and compact fluorescent lamps, including lamps damaged	Mercury and mercury-containing phosphor powder; glass and metal components	Separate collection and recycling/recovery through an authorized facility; prevent breakage	Transfer intact in closed, rigid and clearly labeled containers to a licensed hazardous waste management contractor; do not crush, compact or

	during removal or replacement			dispose of with municipal waste
Electronic components of diesel generator (if applicable)	Control panels, starter batteries	Sulfuric acid, lead, cadmium	Recycling	Licensed hazardous waste disposal contractor

NOTE: Fluorescent lamps may arise during renovation or replacement of existing lighting at the SOC premises. They shall be managed as a separate hazardous waste stream and shall not be mixed with general construction, municipal or electronic waste.

Annex 3. Framework Waste Management Plan

1. Purpose and Status

This framework Waste Management Plan (WMP) has been prepared in accordance with paragraph 3.1 of the ESCP as an annex to the E-Waste Management Plan. It sets out the content of and minimum requirements for the future WMP for the renovation works at the SOC premises. The final site-specific WMP will be prepared as part of the ESMP for these works once their scope has been determined and prior to the commencement of the procurement of works.

2. Scope

This WMP applies to waste to be generated during the renovation works at the premises required for the establishment and operation of the SOC, including construction and demolition waste, packaging waste from construction materials, and hazardous waste associated with the renovation works (fluorescent lamps, paint residues, etc.). It also covers waste that may be identified at these premises prior to the commencement of works, including property left by previous users.

The management of waste generated during the delivery and installation of IT equipment is governed by paragraph 5.2 of the E-Waste Management Plan, and the management of IT equipment at the end of its service life is governed by Section 5 of the E-Waste Management Plan.

3. Legal Framework

Waste management during the renovation works shall be carried out in accordance with the Law of Ukraine “On Waste Management”, which, inter alia, obliges business entities performing construction works to ensure the separate collection of construction and demolition waste, its accounting and its transfer to business entities in the field of waste management. Waste classification shall be carried out in accordance with the Procedure for Waste Classification and the National Waste List (Resolution of the Cabinet of Ministers of Ukraine No. 1102 of October 20, 2023). The local rules of the city of Kyiv on waste management and urban improvement also apply. Legislation shall be applied as in force at the time of the works.

In addition, this WMP is based on the World Bank Environmental and Social Standards (ESS) applicable to the Project under the ESCP, in particular:

- ESS1 “Assessment and Management of Environmental and Social Risks and Impacts”;
- ESS2 “Labor and Working Conditions” — with regard to the safety of workers handling waste;
- ESS3 “Resource Efficiency and Pollution Prevention and Management”;
- ESS4 “Community Health and Safety” — with regard to the impacts of the works and waste transportation on building visitors and the public;

as well as the World Bank Group Environmental, Health and Safety Guidelines (EHS Guidelines).

4. Indicative Waste Streams and Sample Classification

The waste listed in Table A3.1 is expected to be generated during the renovation works at the SOC premises. Waste classification shall be carried out by the waste producer (contractor) in accordance with the Procedure for Waste Classification and the National Waste List (CMU Resolution No. 1102 of October 20, 2023). Waste codes shall be determined with regard to the

source of waste generation, primarily within Chapter 17 “Construction and demolition waste” and, for packaging waste, within Chapter 15.

Table A3.1. Indicative Waste Streams from Renovation Works (Sample Classification)

Waste stream	Examples	Sample code	Class	Priority management method
Concrete, bricks, tiles and mixtures thereof	Residues from the demolition of partitions and floor coverings	17 01 07 (separate fractions — 17 01 01, 17 01 02, 17 01 03)	Non-hazardous	Recycling, backfilling
Gypsum-based materials	Plasterboard, plaster	17 08 02	Non-hazardous	Recycling
Wood	Doors, wooden floor coverings, structures	17 02 01	Non-hazardous	Reuse, recycling
Metals	Profiles, air ducts, metal structures	17 04 05; 17 04 07 (copper, bronze, brass — 17 04 01; aluminium — 17 04 02)	Non-hazardous	Recycling
Cables	Removed power and low-voltage cables	17 04 10* / 17 04 11 (mirror entries)	Depending on composition	Recycling
Plastics	Pipes, profiles, plastic coverings	17 02 03	Non-hazardous	Recycling
Mixed construction waste	Unsorted residues from the works	17 09 04	Non-hazardous	Sorting at a waste treatment facility
Packaging waste	Paper and cardboard, film, wooden pallets	15 01 01, 15 01 02, 15 01 03	Non-hazardous	Reuse, recycling
Fluorescent lamps	Lamps removed during lighting replacement	20 01 21*	Hazardous	Separate collection; transfer to an entity holding a hazardous waste management license (see also Annex 2 to the E-Waste Management Plan)
Paint and solvent residues	Unused or spoiled paints, varnishes, solvents	08 01 11* / 08 01 12 (mirror entries); 14 06 03* (solvents)	Depending on composition	Transfer to an entity entitled to carry out operations with such waste
Asbestos-containing materials (if identified)	Boards, insulation, coverings	17 06 05*	Hazardous	Removal and transfer in accordance with the special requirements of legislation

Note. Waste codes are provided as a sample. The final classification shall be determined in the final WMP prepared as part of the ESMP for the renovation works. An asterisk (*) denotes hazardous waste. For mirror entries, waste shall be classified under the code marked with an asterisk unless the absence of hazardous properties is confirmed by laboratory test reports (paragraph 13 of the Procedure for Waste Classification).

5. Minimum Waste Management Requirements

The contractor performing the renovation works, as the waste producer, shall ensure:

- compliance with the waste management hierarchy: waste prevention, preparation for reuse, recycling and other recovery, with disposal only as a last resort;
- a survey of the premises prior to the commencement of works for the presence of hazardous materials (in particular, asbestos-containing materials and mercury-containing lamps) and of property left by previous users, with documentation of the results;
- removal of left property recorded on a balance sheet only after its write-off by the balance sheet holder in accordance with legislation;
- separate collection of waste at the point of generation by type in accordance with Table A3.1;
- arrangement of designated temporary waste storage areas; hazardous waste shall be stored separately in labeled containers protected from precipitation and unauthorized access, within the periods established by legislation;
- prevention of the mixing of hazardous waste with other waste;
- transfer of waste only to business entities entitled to carry out the relevant waste management operations, and of hazardous waste only to entities holding a license; transportation of hazardous waste in accordance with legislation on the transport of dangerous goods;
- accounting for waste and documentation of its transfer in accordance with legislation;
- prohibition of burning, burying and unauthorized disposal of waste and of its discharge into the sewerage system;
- measures to prevent impacts of the works and waste handling on workers and building visitors: restricted access to work and storage areas, dust suppression, covering of waste during transportation, and use of personal protective equipment.

These requirements shall be included in the bidding documents and the contract for the renovation works and shall be detailed in the final WMP.

6. Roles and Responsibilities

MoF (through the PIU):

- prepares the final WMP as part of the ESMP for the renovation works;
- includes the requirements of the WMP in the bidding documents and contracts for the renovation works, as well as in the terms of reference and contract with the technical supervision firm;
- approves the contractor’s ESMP (C-ESMP);
- monitors compliance with the WMP through the Environmental and Social Specialist of the PIU, in particular by reviewing the monthly reports of the contractor and the technical supervision firm, conducting site inspections and reviewing waste management documentation;

- includes information on the management of waste from the renovation works in the semi-annual reports to the World Bank.

Contractor:

- as the waste producer, ensures compliance with the requirements of Sections 4 and 5 of this WMP, including waste classification, separate collection, storage, accounting and transfer;
- prior to the commencement of works, develops a C-ESMP including a section on waste management;
- appoints a person responsible for waste management at the site;
- extends the requirements of this WMP to subcontractors;
- submits monthly reports on environmental and social performance, including information on waste management.

Technical supervision firm:

- monitors the contractor's compliance with the WMP at the site and reflects the results in its monthly reports.

Balance sheet holder of the premises:

- prior to the commencement of works, ensures that the premises are cleared of property recorded on its balance sheet or that such property is written off in accordance with legislation;
- provides available information on the possible presence of hazardous materials at the premises.

The contract for the renovation works shall define the rights and obligations of the parties with respect to waste generated during the works.

7. Monitoring and Reporting

The contractor's monthly reports shall include information on the types and quantities of waste generated and transferred, the business entities to which it was transferred, and the documents confirming the transfer. Information on hazardous waste shall be provided separately. The technical supervision firm shall reflect the results of its oversight of waste management in its monthly reports.

Summary information on the management of waste from the renovation works shall be included in the semi-annual reports to the World Bank (paragraph 7.2 of the E-Waste Management Plan). Incidents related to waste shall be reported in accordance with paragraph 7.3 of the E-Waste Management Plan.

8. Content of the Final WMP

The final WMP to be prepared as part of the ESMP for the renovation works at the SOC premises shall include, as a minimum:

- a description of the works and the sources of waste generation;
- the results of the survey of the premises for the presence of hazardous materials and left property;
- indicative quantities of waste by type;
- the final classification of waste in accordance with the National Waste List;
- the management methods for each type of waste in accordance with the waste management hierarchy;

- the layout of and requirements for temporary waste storage areas;
- requirements for the business entities to which waste is transferred and for waste transportation;
- the procedure for waste accounting and the documentation of its transfer;
- the procedure to be followed if unforeseen hazardous materials are identified during the works;
- measures to prevent impacts of the works and waste handling on workers and building visitors;
- responsible persons and monitoring and reporting arrangements.