

**Barbados Port Inc. - BARBADOS
Environmental and Social Action Plan (ESAP)**

No.	Aspect	Action	Deliverable	Delivery date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Design of the facility, EPC contractor requirements	1. Include as part of the EPC contract, ESHS policies, plans and procedures that the EPC will be required to comply with as part of the ESMS.	1. Copy of pertinent part of the contract.	1. 30 days before the order to proceed
1.2	Environmental and Social Management System (ESMS)	1. Develop and adopt a detailed, and specific ESMS for BPI, including: (i) policy; (ii) procedures to identify, assess and manage possible E&S, OHS, and occupational risks and impacts associated with each Port activity (including the WTE system), and for workers engaged by third parties (contractors and subcontractors) performing works at the Port; (iii) organizational capacity and competency, including the definition of roles and allocation of responsibilities for the implementation of the ESMS; (iv) emergency preparedness and response protocols; (v) key stakeholder engagement methods or planning; (vi) external communications and grievance mechanism; (vii) protocols for the disclosure of information, decision making and training to communities; (ix) protocols for the evaluation and continuous improvement of the ESMS; and (xi) regular audits and inspections of applicable E&S and OHS requirements under the applicable laws of Barbados.	1. Copy of BPI's ESMS 2. Evidence of ESMS adoption	1. Prior to first disbursement 2. Prior to first disbursement
1.3	Identification of Risk and Impacts	1. Develop and maintain a risk matrix for construction and operations.	1. Risk matrix on E&S and OHS risks and impacts for Project construction and installation 2. Updates to the risk matrix	1. 30 days before the order to proceed 2. As part of the Annual Environmental and Social Compliance Report (ESCR)
1.4	Management Programs	1. As part of the ESMS, update the following plans: i) Stakeholder Engagement Plan, ii) Emergency Response Plan, iii) Waste Management Plan. 2. Update the Internal Grievance Mechanism 3. Develop monitoring programs for air quality/emissions, effluents quality, and occupational health and safety. 4. Produce an Environmental Management and Adequacy Program (EMAP) for the construction phase, that includes: (i) an Impact Management Program for the physical, biological, and visual environment; and (ii) an Impact Management Program for the socioeconomic environment. 5. Produce an EMAP for the O&M phase, which includes: (i) an Environmental Monitoring and Vigilance Program; (ii) a Solid and Liquid Waste Management Program; and (iii) a Workplace Health and Safety Program.	1. Updated Plans. 2. Updated Grievance Mechanism 3. Monitoring Programs 4. EMAP for construction 5. EMAP for O&M	1. Prior to first disbursement. 2. Prior to first Disbursement. 3. 30 days before the Operation and Maintenance (O&M) phase. 4. 30 days before the order to proceed 5. 30 days before the O&M phase.
1.5	Organizational Capacity	1. Present an E&S organizational chart that includes roles and responsibilities for each position. 2. Appoint a person responsible for overseeing the E&S performance of the Port, the Project, the EPC contractor.	1. Organizational chart 2. Copy of the appointment administrative resolution.	1. 30 days before the order to proceed. 2. 30 days before the order to proceed.

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1.6	Emergency Preparedness and Response	<ol style="list-style-type: none"> 1. Update Emergency Response Plan. 2. Appoint the Emergency Response Team (ERT). 3. Implement ERT training 4. Perform drills and simulations involving communities and stakeholder groups. 	<ol style="list-style-type: none"> 1. Updated Emergency Response Plan 2. Evidence of appointment 3. Evidence of training 4. Drill reports. 	<ol style="list-style-type: none"> 1. Prior to first disbursement 2. Six months after the signature of loan agreement. 3. With the first Environmental and Social Compliance Report (ESCR) 4. Periodically as part of the ESCR.
1.7	Monitoring and Review	<ol style="list-style-type: none"> 1. Establish procedures to monitor and measure the effectiveness of management programs. 2. Develop and maintain a compliance matrix for legal and contractual obligations. 3. Develop a set of key performance indicators (KPI) to measure the effectiveness of Environmental Social and Health and Safety programs. 	<ol style="list-style-type: none"> 1. Monitoring procedures 2. Compliance matrix 3. Key performance indicators 	<ol style="list-style-type: none"> 1. Six months after signature of loan agreement. 2. Six months after signature of loan agreement. 3. Six months after signature of loan agreement.
1.8	Stakeholder Engagement	<ol style="list-style-type: none"> 1. Enhance the Stakeholder Engagement Framework to convert it into a Stakeholder Engagement Plan by including: i) a summary of any previous engagement activities; ii) description of risk and impacts by stakeholder group; iii) prioritization of stakeholders according to their vulnerability, iv) an engagement program including indication of how interactions should be formalized (acknowledge receive of information) and v) a list of time-bound activities to be performed with each group (timetable/periodicity) 	<ol style="list-style-type: none"> 1. Copy of a Stakeholder Engagement Plan 	<ol style="list-style-type: none"> 1. Prior to first disbursement.
1.9	External Communication and Grievance Mechanism	<ol style="list-style-type: none"> 1. Socialize the external grievance mechanism with the five stakeholder groups. 2. Update the grievance mechanism for the O&M of the project including lessons learned from the construction phase if any. 	<ol style="list-style-type: none"> 1. Proof of socialization of grievance mechanism 2. Revised grievance mechanism for the O&M phase. 	<ol style="list-style-type: none"> 1. 30 days before the order to proceed 2. 30 days before Operation.
1.10	On-going reporting to affected communities	<ol style="list-style-type: none"> 1. Prepare a non-technical explanation of the Project to be distributed to the surrounding communities. 2. Conduct a Townhall meeting with the five main stakeholder groups identified to: (i) inform them about the project; (ii) inform them about the possible impacts; (iii) make them aware of the proposed management measures for undesired impacts; (iv) explain the community grievance mechanism; and (v) capture their concerns about the Project. 	<ol style="list-style-type: none"> 1. Non-technical explanation of the Project 2. Townhall meeting 	<ol style="list-style-type: none"> 1. 30 days before the order to proceed 2. Prior to first disbursement
PS 2: Labor and Working Conditions				
2.1	Internal Grievance Mechanism	<ol style="list-style-type: none"> 1. Update the internal grievance mechanism to include a process to capture and process anonymous complaints. 	<ol style="list-style-type: none"> 1. Updated grievance mechanism 	<ol style="list-style-type: none"> 1. Six months after signature of loan agreement.
2.2	Protecting the workforce	<ol style="list-style-type: none"> 1. Update BPI's HR policy by including the prohibition of child and forced labor. 	<ol style="list-style-type: none"> 1. Updated HR policy 	<ol style="list-style-type: none"> 1. Six months after signature of loan agreement
2.3	Occupational Health and Safety	<ol style="list-style-type: none"> 1. Monitor and report Lost Time Injury Frequency Rate (LTIFR) and develop root cause analysis of incidents to lower the Frequency Rate. 	<ol style="list-style-type: none"> 1. LTIFR 2. Hazard risk matrix. 	<ol style="list-style-type: none"> 1. As part of the ESCR.

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		<ol style="list-style-type: none"> 2. Produce and maintain a risk matrix that identifies potential hazards to workers. 3. Perform a fire safety gap analysis of the current fire system in the buildings identified as suitable for PV roof top installation. 	<ol style="list-style-type: none"> 3. Gap analysis report. 	<ol style="list-style-type: none"> 2. 30 days before the order to proceed and thereafter with the ESCR 3. 30 days before the order to proceed
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Air Quality	<ol style="list-style-type: none"> 1. Produce an air emissions monitoring plan. 2. Calculate GHG emissions 3. Report on GHG emissions. 	<ol style="list-style-type: none"> 1. Air emissions monitoring plan 2. GHG calculations for the upcoming year. 3. GHG results for last year. 	<ol style="list-style-type: none"> 1. 30 days before the Operation and Maintenance (O&M) phase. 2. As part of the ESCR. 3. As part of the ESCR.
3.2	Waste Management Plan (WMP)	<ol style="list-style-type: none"> 1. Produce a WMP that includes: i) the review of new waste sources during planning, siting, and design activities, ii) collection of data and information about the process and waste streams in existing facilities, including characterization of waste streams by type, quantities, and potential use/disposition; iii) establishment of priorities based on a risk analysis that takes into account the potential EHS risks during the waste cycle; iv) definition of procedures and operational controls for onsite storage; v) definition of options, procedures and operational controls for treatment and final disposal. 	<ol style="list-style-type: none"> 1. Waste Management Plan 2. Proof of implementation 	<ol style="list-style-type: none"> 1. Prior to disbursement 2. 30 days after O&M phase.
3.3	Water Management Plan	<ol style="list-style-type: none"> 1. Develop an Effluent Management Program that includes the evaluation, treatment, control, and monitoring of effluents. 	<ol style="list-style-type: none"> 1. Effluent Management Program 	<ol style="list-style-type: none"> 1. 30 days before O&M phase
PS 4: Community Health, Safety, and Security				
4.1	Decommissioning Plan	<ol style="list-style-type: none"> 1. Enhance BPI's Decommissioning Plan to include the recommendations from IFC General EHS Guidelines for Construction and Decommissioning 	<ol style="list-style-type: none"> 1. Enhanced Decommissioning Plan 	<ol style="list-style-type: none"> 1. Prior to decommissioning current incinerator facility
4.2	Emergency Preparedness and Response	<ol style="list-style-type: none"> 1. Enhance the Emergency Response Plan to include safety procedures in case of explosions and fires at fuel storage areas to protect the community. 	<ol style="list-style-type: none"> 1. Enhanced ERP. 	<ol style="list-style-type: none"> 1. Prior to first disbursement