

**Midnight Sun Solar PV Project – Jamaica
Environmental and Social Action Plan (or ESAP)**

No.	Aspect	Action	Deliverable	Delivery date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Environmental Licensing	- Obtain the environmental license for the Project. - Implement the actions contained in the environmental license issued by the National Environmental Planning Agency (NEPA).	- Environmental license. - Evidence of implementation	- Before the start of the construction phase. - As part of the Environmental and Social Compliance Report (ESCR).
1.2	Environmental, Social and Health and Security Management System (ESHSMS)	Develop an Environmental, Social and Health and Security Management System (ESHSMS) that contains: (i) a policy; (ii) an identification of risks and impacts procedure; (iii) management programs; (iv) organizational capacity and competence requirements; (v) emergency preparedness and response protocols; (vi) stakeholder participation guidelines; and (vii) monitoring and evaluation procedures.	ESHSMS	3 months after the first disbursement.
		Implement periodic of internal audits (environmental, social, and health and safety).	Internal audits (environmental, social, health and safety) results.	3 months after the first disbursement and then periodically at the ESCR.
1.3	Management programs	Develop Environmental and Social Technical Specifications (ESTS) to be included in the Construction Contract.	ESTS	45 days prior to the publication of the tender for the construction project.
		Implement the Project's Environmental and Social Management Plan and the ESTS.	Evidence of implementation.	As part of the ESCR.
1.4	Organizational capacity	Designate a specific person to follow up on the Project's environmental and social issues.	Copy of the designation instrument.	30 days after the first disbursement.
		Include in the construction contracts the Environmental and Social Technical Specifications (ESTS), in order to comply with: (i) the applicable labor and OSH legislation, in particular the prohibition of child labor and forced labor, non-discrimination, gender equity and guaranteeing safe working conditions, and (ii) the applicable environmental legislation, in order to minimize environmental impacts, through the prevention of pollution and the rational consumption of natural and energy resources in its operations.	Copy of the contracts.	45 days prior to the adjudication of the construction project.
1.5	Gender risks	Develop a Gender Action Plan (GAP) that includes: (i) a gender risk analysis; (ii) guidelines for equitable and gender-free recruitment with KPIs; (iii) a protocol for the prevention of workplace and sexual harassment, and gender violence, with guidelines for contractors; and (iv) a gender-sensitive grievance mechanisms.	GAP	60 days before the start of the construction phase.
		Train contractors and outsourced workers on the GAP.	Evidence of training.	As part of the ESCR.
1.6	Preparedness and response to Emergency situations	Develop a more detailed Emergency Prevention, Preparedness, and Response Plan ("PPPRE") that: i) identifies the work fronts, places and situations prone to generate emergencies or accidents; (ii) contains procedures to prevent or respond to each identified situation, allocating the necessary human, technical, logistical and financial resources; (iii) assigns responsibilities for management, execution, response and control, ensuring that each activity prone to emergency situations has a person in charge of supervising it; (iv) designs, adopts and implements a communication plan; (v) regularly trains all project staff and have a full understanding of the emergency response plan; (vi) includes coordination protocols with government agencies (national and local) and community groups associated with emergency prevention and response; and (vii) contains	Detailed PPPRE	60 days before the start of the construction phase.

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		instructions for carrying out drills and simulations to verify the operation of the system and use the results of these exercises in the process of continuous improvement.		
1.7	Stakeholder Engagement	1. Update the Stakeholder Engagement Plan (SEP) to include: (i) specific engagement events and frequency for each stakeholder group; (ii) communication materials and disclosure formats; (iii) roles and responsibilities; (iv) an action plan; (v) a schedule of activities; and (vi) a stakeholder communication plan.	1. SEP.	1. 3 months after the first disbursement.
		2. Implementation of the SEP.	2. Evidence of implementation.	2. As part of the ESCR.
1.8	External Communication and Grievance Mechanisms	1. Update the External Grievance Mechanisms (EGM) to allow it to: (i) receive and process anonymous complaints; (ii) receive complaints from vulnerable groups; and iii) handle complaints of sexual harassment or violence.	1. EGM.	1. 3 months after the first disbursement.
		2. Implementation of the EGM.	2. Evidence of implementation.	2. As part of the ESCR.
PS 2: Labor and Working Conditions				
2.1	Child Labor	1. Create a Supplier Policy to address environmental and social issues and focuses on preventing forced or child labor in imported solar energy components.	1. Supplier Policy.	1. 3 months after the first disbursement.
		2. Implementation of the Supplier Policy.	2. Evidence of implementation.	2. As part of the ESCR.
2.2	Occupational Health and Safety	1. Update the Worker Health and Safety Management Plan (WHSMP) and an Environmental Health and Safety Management Plan (EHSMP) to incorporate: (i) hazard identification and risk analysis protocols; (ii) instructions for working at heights; (iii) electrical safety procedures; (iv) preliminary risk analysis methodologies; (v) provisions for work in confined spaces, movement of loads, security inspections, excavations; (vi) minimum requirements for vehicles and mobile equipment; (vii) personal and collective protective equipment requirements; (viii) risk analysis and work permit requirements; (ix) reporting of accidents protocols; and (x) the right to refuse unsafe work; among others..	1. Updated WHSMP.	1. 45 days prior to the adjudication of the construction project.
		2. Implement the WHSMP.	2. Evidence of implementation.	2. As part of the Environmental and Social Compliance Report (ESCR).
2.3	Workers Engaged by Third Parties	1. Ensure: (i) that the contractor is provided with Environmental and Social Technical Specifications ("ETAS"); (ii) contractual clauses have been incorporated to ensure the implementation of such actions; (iii) regulations on EHS for contracted companies and service providers have been produced; (iv) a list of minimum EHS requirements for service providers has been prepared; (v) contractor's environmental risk prevention programs have been developed; and (v) guidelines for audits and inspections in the field, to supervise their implementation have been put in place.	1. ETAS, clauses, regulations, lists, risk prevention programs, and guidelines.	1. 45 days prior to the publication of the tender for the construction project.
2.4	Supply Chain	1. Update the Construction Management Plan (CMP) to ensure that the supply chain: (i) avoids sourcing areas with alleged child or forced labor presence; and (ii) requires suppliers to provide an affidavit confirming that the solar panels are free from child or forced labor.	1. CMP updated	1. 3 months after the first disbursement.
		2. Implement the CMP.	2. Evidence of implementation.	2. As part of the ESCR.

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PS 3: Resource Efficiency and Pollution Prevention				
3.1	Water Consumption	1. Update the Water Quality Management Program (WQMP) to: (i) also monitor consumption during construction and operation; and (ii) establish guidelines to coordinate with NWC on the prioritization of community supply in the event of drought.	1. WQMP Updated	1. 45 days prior to the adjudication of the construction project.
		2. Implement the WQMP.	2. Evidence of implementation.	2. As part of the ESCR.
3.2	Wastes	1. Update Waste Management (WMP) to include: (i) detailed information on the removal, recycling, or safe disposal of photovoltaic modules and related equipment; ii) specifications of certified facilities to ensure the safe handling and storage of hazardous materials; (iii) an inventory of photovoltaic components with reuse or recycling options.	1. WMP Updated	1. 45 days prior to the adjudication of the construction project.
		2. Implement the WMP.	2. Evidence of implementation.	2. As part of the Environmental and Social Compliance Report (ESCR).
PS 4: Community Health, Safety, and Security				
4.1	Security Personnel	1. Develop a Security Management Plan (SMP) that includes: (i) a specific Code of Conduct that ensures that security personnel do not have a criminal record or have been previously involved in cases of abuse; (ii) a training program on the use of force , and on the Voluntary Principles on Security and Human Rights (VPSHR and on environmental and social awareness); and (iii) guidelines on restriction, procedure and permits to carry weapons.	1. SMP	1. 45 days prior to the adjudication of the construction project.
		2. Implement the SMP.	2. Evidence of implementation.	2. As part of the ESCR.
PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources				
6.1	Protecting biodiversity and Conservation	1. Develop a Biodiversity Action Plan (BAP) that includes: (i) a critical habitat analysis to determine if the Project area is within a critical habitat; (ii) measures to prevent the proliferation of invasive species; and (iii) an ecosystem services analysis	1. BAP	1. 1 month after the first disbursement.
		2. Implement the BAP.	1. Evidence of implementation.	1. As part of the ESCR.