

**Environmental & Social Action Plan for Orange Telecom Project in Liberia  
#14784 (September 2022)**

No.	Performance Standards	Due Dates	Deliverable
<b>PS1: Assessment and Management of Social and Environmental Risks and Issues</b>			
<p><b>1.</b></p>	<p>The PE will be required to update the Project specific ESMS that conforms with Liberia laws, is aligned with MIGA PSs, and as well as applicable WBG Environmental Health and Safety (EHS) guidelines for construction and operations. The ESMS will include the following items: (i) Environmental and Social (E&amp;S) Policy (ii) management programs and plans (such as emergency preparedness and response mechanisms, management of hazardous and non-hazardous waste, and stakeholder engagement); (iii) organizational capacity, responsibilities, and competence; and with monitoring actions and an overarching system for reporting and tracking non-compliances.</p> <p>1. ESMS draft</p> <p>2. Final ESMS</p>	<p>Within 2 months of the Effective Date.</p> <p>Within 3 months of the effective date</p>	<p>Submit to MIGA the Project’s ESMS draft manual</p> <p>Submit to MIGA the Project’s Final ESMS manual.</p>
<p><b>2.</b></p>	<p>The PE will develop and implement a Climate Risk Management framework which will be used to conduct climate risk screening for prospective telecom towers and to identify the extent to which climate resilience measures are required.</p>	<p>Within 6 months of the Effective Date.</p>	<p>Submit to MIGA a copy of the Climate Risk Management framework</p>
<p><b>3.</b></p>	<p>The PE will include specific OHS requirements and E&amp;S risk management clauses in the EPC and O&amp;M contractor contracts to be in line with MIGA’s PSs requirement.</p>	<p>Prior to MIGA Contract of Guarantee (CoG) signing</p>	<p>Submit to MIGA the EPC and O&amp;M contractor’s contract.</p>
<p><b>4.</b></p>	<p>The PE will develop the HSE Policy as part of the ESMS update to include management of social risks to guide the project to achieve sound environmental and social performance in line with MIGA PS 1.</p>	<p>Prior to MIGA Contract of Guarantee (CoG) signing</p>	<p>Submit to MIGA the PE and EPC and O&amp;M contractor’s HSE policies document</p>

5.	The PE will be required to develop an ESIA for the additional sites ,obtain the environmental and operational permits during construction, and operations, and establish measures to implement and comply with the permit requirements in line with national laws and MIGA’s PS requirements.	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA the ESIA and copies of environmental and operational permits.
6.	The PE will be required to develop the Project Environmental Social Management Plan (ESMP) to be in line with MIGA’s PSs and WBG EHS guidelines for the construction and operations phases .  1. ESMPs draft  2. Final ESMPs	Within 1 month of the Effective Date.  Within 2 months of the effective date	Submit to MIGA the Project’s ESMPs draft.  Submit to MIGA the Project’s Final ESMPs.
7.	The PE will be required to appoint an experienced and qualified Health, Safety and Environment (HSE) officers to manage the Project E&S risks in line with the requirements of MIGA’s PS1 during the Project construction and operation phases.	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA the appointed HSE officer appointment letter and CVs.
8.	The PE will develop an Emergency Preparedness and Response Plan (EPRP) to address the telecom towers risks including fire and other external emergencies during the Project construction and operations phases.	Within 1 month of the Effective Date	Submit to MIGA the PE’s EPRP
9.	The PE will be required to equips all sites with firefighting equipment including adequate fire extinguishers on sites that are regularly inspected and well maintained in line with the national law and with the requirements of MIGA’ PS1. PE will require the EPC and O&M contractor to train staff, in particular the security guards (due to their continuous presence on site) on how to operate the fire extinguishers in case of fire.	Within 3 months of the Effective Date	Submit to MIGA photographic evidence of fire extinguishers equipped on Project Sites.  Submit to MIGA staff and security guards training records on firefighting.

10.	The PE will be required to develop a Project specific Stakeholder Engagement Plan(SEP) in line with the requirements of MIGA PS 1 for the Project construction and operation phases.	Within 1 month of the Effective Date	Submit to MIGA the SEP.
11.	The PE will be required to develop Community Grievance and External Communication Mechanism in line with the requirements of MIGA PS 1 for the Project construction and operation phases.	Within 1 month of the Effective Date	Submit to MIGA the Community Grievance and External communication Mechanism
<b>PS2: Labor and Working Conditions</b>			
12.	The PE will require the EPC and O&M contractors to update and align its HR Policy and Procedures with the PE's HR policies and procedures, national requirements and MIGA PS 2.	Within 1 month of the Effective Date	Submit to MIGA EPC and O&M contractors HR Policy and Procedures.
13.	The PE will require the EPC and O&M Contractor to develop Project Code of Conduct for all employees and applied to the subcontractors during construction and operation phase. The code of conduct will include provisions related to zero tolerance towards sexual harassment, sexual exploitation and abuse and gender-based violence (GBV)	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA the Project Code of Conduct .
14.	PE will require the EPC and O&M contractor to develop a training plan (to include HR policies and procedures) and provide these training to workers per national labor laws and MIGA PS2 requirements.	Within 1 month of the Effective Date	Submit to MIGA the Training plan and training materials.
15.	The PE will require EPC and O&M contractor to conduct a labor audit on the security companies to assess the security officer labor and working conditions (including terms and conditions, wages, leave, health insurance and working hours etc.) to ensure it in line with the PE's HR policies/procedure, national laws and MIGA PS2 requirements	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA the Security companies labor audit.
16.	The PE will be required to provide security guard's shelter facilities for old sites and ensure that they are in good condition, and they have access to basic facilities (such as basic toilets, water and night light) and construct shelter facilities for the new sites.	Within 5 months of the Effective Date	Submit to MIGA photographic evidence that Security guards' shelter have constructed and refurbished for dilapidated ones.
17.	The PE will require the EPC and O&M contractor to develop and implement policies and procedures for third-party workers for managing and monitoring their performance in relation to MIGA PS's.	Within 1 month of the Effective Date	Submit to MIGA Third party employee policies and procedures
18.	The PE will require EPC and O&M contractor to develop Project-specific OHS procedure for the construction and operations phases. These procedure will cover the following issues: i) hazard identification and assessment; ii) construction site safety; iii) specific procedures for hazardous works, worker's safety and training; iv) use of personal protective equipment; v) implement	Within 1 month of the Effective Date	Submit to MIGA the EPC and O&M contractor's OHS procedures and plan

	a worker's health program to screen the health of workers and measures to manage diseases (such as Malaria, Typhoid, Ebola and COVID-19); vi) site supervision and audit procedures; and vii) incident investigations and reporting system and intervention measures (medical surveillance programs and first aid etc.).		
19.	The PE will commit that all complaints of sexual harassment and Gender based Violence and harassment (GBVH) will be seriously investigated, and disciplinary action will be taken.	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA written confirmation that all complaints of sexual harassment will be seriously investigated, and disciplinary action will be taken.
<b>PS3: Resource Efficiency and Pollution Prevention</b>			
20.	The PE will require the EPC/O&M contractor to update the waste management plan (solid and hazardous ) to include a clear process how solid and hazardous waste are generated from each site, stored , segregated, and disposed to an approved landfill by a licensed vendor in line with MIGA PS3 requirements for construction and operations phase.	Within 1 month of the Effective Date	Submit to MIGA the updated waste management plan for construction and operations phase
21.	The PE will require the EPC and O&M contractor to develop a hazardous waste tracking and documentation mechanisms to ensure that the hazardous waste is disposed by a licensed vendor to an approved facility/landfill site.	Within 1 month of the Effective Date	Submit to MIGA the hazardous waste tracking register.
<b>PS4: Community Health, Safety and Security</b>			
22.	The PE will require the EPC and O&M contractor to develop and implement a Security Risk Assessment and a Security Management Plan (SMP) for the new sites in line with MIGA's PS4 .	Within 1 month of the Effective Date	Submit to MIGA the following plans: a) Security Risk Assessment and b) Security Management Plan
23.	The PE will require the EPC and O&M Contractor to confirm and verify that the selected private security companies have obtained necessary national licenses to operate as a private security company and abides by regulations established by the Liberian government authorities	Within 1 month of the Effective Date	Submit to MIGA the selected security companies' licenses and government approvals.