

## Recommended Action Plan

The below action plan identifies actions to be implemented by the Malicounda 120 MW dual fuel power plant project in Senegal to address the gaps identified in a compliance review of existing Environmental & Social documentation against IFC (International Finance Corporation) standards. It is an extract of Ramboll's report dated June 19, 2020, prepared on behalf of Malicounda Power and based on a desktop review of Project information, mainly including an ESIA (conducted by EES in 2018) and a Resettlement Action Plan (preliminary revised version dated June 1, 2020).

IFC Performance Standard (PS)	Recommended actions	Deliverable	Materiality	Schedule
PS 1 - Project Standards	The Project sponsor should clearly refer to IFC standards (IFC PS, IFC General EHS Guidelines, IFC EHS Guidelines for Thermal Power Plants) and select the most stringent values as the applicable thresholds for the Project design and operational phases.	Project standards document	Medium	Before financial close (to be considered in the engineering and procurement phase)
PS 1 – Analysis of Alternatives	If a transition from HFO to gas is actually considered in a nearby future, this option should be explored further, and appropriate details provided (keeping in mind that a dedicated ESIA will still have to be prepared). This is especially important where the conversion to gas is mentioned to support design choices (e.g. stack height) or selection of mitigation measures (e.g. for residual impacts to ambient air quality).	Additional information on conversion to gas (in particular, expected timeframe and general implications for the plant and associated emissions/effluents)	Low	Before operations
PS 1 - Associated Facilities	IFC PS1 expects that the Project Owner will address the risks and impacts of associated facilities in a manner commensurate with its control and influence. Associated facilities are expected to include the access road and new HV transmission lines, if any.	Additional information on associated facilities	Medium	As soon as available

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PS 1 – Social Impact Assessment	<p>A complementary social baseline is recommended to provide further detail on the surrounding communities (distance of settlements/ neighbourhoods to the Project site, socioeconomic activities that could be disturbed by the Project, vulnerable groups, etc.)</p> <p>The complementary study should clearly analyse the communities in the Project area and their categories, those affected directly and indirectly by the Project.</p> <p>The Project area of influence for social aspects should be refined based on considerations of direct and indirect impacts, associated facilities and cumulative impacts. Vulnerable and disadvantage groups should be included in the recommended complementary baseline.</p> <p>The area of influence should include consideration of the associated facilities and sources of cumulative impacts to ensure that these aspects are adequately addressed in the impact assessment and management plan sections.</p>	Complementary social baseline study Complete the ESMP as necessary	Medium	Before financial close
PS 1 – Stakeholder Engagement Activities	A comprehensive SEP should be developed based on the consultations that have already been carried out, considering the specific gaps identified in the compliance review, including more detailed stakeholder mapping, a gender approach (and identification of vulnerable people), a stakeholders grievance redress mechanism and demonstrating the representativity of the participation.	Stakeholder Engagement Plan (SEP)	Medium	First version to be available as soon as practicable, no later than financial close. To be reviewed and updated along the Project lifecycle.
PS 2 – Human Resources Policy	The Project Owner will need to have in place a HR Policy, labor recruitment procedure (including an assessment of the potential impacts related to the influx of labor), workers grievance mechanism, contractor management plan, as part of the ESMS and in accordance with IFC PS1, PS2 and PS4.	HR Policy	Low	Before financial close
PS 3 – Air quality baseline	<p>Conduct additional air sampling campaigns as planned in the ESMP.</p> <p>Conduct these campaigns in different season(s) and for a longer duration to obtain more robust air background levels. Use of passive tubes could allow a continuous sampling during 1 or 2 weeks and to confirm (or infirm) the high concentrations observed during the baseline study.</p> <p>Pollutants to be included are at least (but not limited to): NO<sub>2</sub>, SO<sub>2</sub> and PM. CO could also be included.</p> <p>Also, the area of study should be slightly extended to match with the air dispersion contour maps (with a confirmation of sensitive receptors location)</p>	Analytical results and monitoring reports Updated sensitive receptors location map	Medium	As soon as practicable, no later than financial close

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PS 3 – Air emissions levels	Confirmation and clear presentation of the fuel quality and emission levels of the Project.	Complementary document	High	Before financial close
PS 3 – Air emissions levels and monitoring	Based on existing studies, the use of a 1% sulphur fuel is needed to ensure compliance with IFC guidelines. Conduct continuous monitoring of the fuel sulfur content and implement mitigation measures in case of higher sulfur content (such as having enough storage capacity to allow control of the fuel to be used).	Analytical results	High	During operations
PS 3 – Stack height definition	The stack height choice of 42m should be better justified against applicable standards if the emissions levels compliance and the use of a very low sulphur-fuel cannot be confirmed.	Complementary information, as needed	Medium	Before financial close
PS 3 – Air quality impact assessment and monitoring	Close monitoring of air emissions during operations (already planned in the ESMP). Pollutants to be included are at least (but not limited to): NO <sub>x</sub> /NO <sub>2</sub> , SO <sub>x</sub> /SO <sub>2</sub> , PM and CO. Close monitoring of ambient air quality at fence line and around the site (already planned in the ESMP), with a re-evaluation of sensitive receptors location. Pollutants to be included are at least (but not limited to): NO <sub>2</sub> , SO <sub>2</sub> and PM. CO could also be included. The monitoring should be continuous to meet IFC requirements at the beginning of operations and should be reviewed regularly to adapt. Conduct external controls of the air emissions and ambient air monitoring (already planned in the ESMP). Additional monitoring and mitigation measures (including filters, flue gas desulfurization, low-NO <sub>x</sub> burners) would need to be implemented should monitoring results show non-compliant levels.	Analytical results and monitoring reports Updated sensitive receptors location map	High	During operations
PS 3 – Air Quality Mitigation measures	Clarification on the mitigation measures needed for air emissions including those required for ensuring acceptable ambient air quality impacts. Quantification of the residual impact (e.g. abatement rates)	Complementary document	High	Before financial close
PS 3 – Greenhouse Gases (GHG)	Annual quantification of GHG emitted by the Project	Annual report	Medium	During construction and operation

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PS 3 – Noise	<p>Ensure that the acoustic recommendations from the noise modeling study are properly considered in the design and construction phases.</p> <p>During the operations phase, another noise survey will have to be conducted to confirm that the implementation of the acoustic recommendations is sufficient to comply with IFC standards.</p>	<p>Complementary mitigation measures</p> <p>Noise survey results</p>	Medium	<p>Acoustic recommendations to be considered during the design and construction phases.</p> <p>Noise surveys during operations.</p>
PS 3 - Wastewater	<p>Complementary impact assessment of wastewater discharge and definition of the most appropriate mitigation measures, including more information on the wastewater treatment and discharge solution and the assessment of impacts on soil, groundwater and surface water.</p> <p>Also, the applicable thresholds should be confirmed to the Contractor, including IFC standards.</p>	<p>Complementary impact assessment of wastewater</p> <p>Project standards document</p>	Medium	Before financial close

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PS 5 - Resettlement Action Plan	<p>Further explanation in the RAP should be provided in order to clarify the differences between the findings during the ESIA and the RAP. A field visit is recommended to verify the current situation in the Project site and Buffer zone.</p> <p>In addition, the below issues should be further justified and/or reviewed in the RAP:</p> <ul style="list-style-type: none"> <li>• Clarify the methodological approach chapter of the RAP for a better understanding of the background and context of the compensation process so far. All documentary proof (survey forms, signed minutes, etc.) should be included in Annex;</li> <li>• Identification of the missing 15 PAPs to be fully considered and included in the RAP. Legal provisions under Senegalese law should be explored and presented for an exit strategy to this blocking point. If applicable, include the steps to be followed;</li> <li>• The eligibility criteria should be reviewed to be compliant with the economic displacement principles of the IFC PS5. Chapter 5 should go beyond loss of assets and land and clearly define the PAPs category and their eligibility according to IFC PS5, including use the land as source of income/livelihoods. Based on a complementary ESIA baseline, identify whether other potential economic PAPs are to be considered in the RAP (such as herders) The livelihoods restoration measures (enhancement measures for the AfDB) should be thus further developed, including these additional groups;</li> <li>• Cut-off-date should be further explained and evidence on communication and dissemination should be provided;</li> <li>• Clarify the background on the retained option for cash compensation against land compensation;</li> <li>• Clarify some conflicts and overlapping land use as per the available maps.</li> </ul> <p>In addition, the RAP should clarify how the views of vulnerable population have been considered to design the mitigation measures and the Grievance Redress Mechanism should be updated in order to ensure the participation of illiterate people as well as vulnerable population and women.</p> <p>The RAP consultant to be involved in the implementation phase should further analyze the competences and capacities of the involved parties and adjust roles and responsibilities accordingly.</p>	<p>Amended RAP in line with IFC PS5, including updated Grievance Redress Mechanism and further developed livelihoods restoration (enhancement) measures.</p> <p>A field visit to amend RAP is expected to obtain clarification on potential economic PAPs, construction of dwellings in buffer zone, and land uses.</p>	High	Amended RAP prior to financial close

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PS 7 – Indigenous People	Clarification and justification the applicability of PS7	Specific chapter in the complementary social baseline study	Medium	Before financial close
PS 8 – Cultural Heritage	Based on further analysis, the impact on the cemetery should be assessed and mitigation measures adapted accordingly in the ESMP.	Specific chapter on the complementary social baseline study	Medium	Before financial close
PS 8 – Cultural Heritage	An IFC-compliant chance find procedure adapted to the size and challenges of the Project should be developed prior to the commencement of the Early Works.	Chance find procedure	Medium	As soon as practicable