

# **APPENDIX A: ENVIRONMENTAL AND SOCIAL ACTION PLAN**

## DASA URANIUM PROJECT: ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP) (Draft)

Basis: EIA (2020, Art and Genie) & EIA Final Update (2022)

CAT No.	Aspect	Compliance (PC, NC)	Corrective Action Required	Responsibility	Timeframe *	Risk Rating
<b>IFC Performance Standards</b>						
<b>IFC PS 1 Assessment and Management of Environmental and Social Risks and Impacts</b>						
EA1	Environmental and Social Assessment and Management System (ESMS)	PC	Develop and implement a Framework ESMS with systematic steps and operational tools for managing the environmental and social performance. A compliant ESMS covers 1) policy, 2) identification of risks and impacts, 3) management programs, 4) organizational capacity and competency, 5) emergency preparedness and response, and 6) monitoring and review.	SOMIDA / Environmental Consultants	Finalise ESMS as soon as possible. Include management of change procedures to take account of design and material changes as well as recruitment at appropriate Project development stages.	M
EA2	Environmental and Social Policy	PC	Collate existing EHSS objectives, policies and management structures into board-approved policies for investor and public dissemination. In doing so, develop the SOMIDA Environmental Health and Safety Policy.	SOMIDA / Environmental Consultants	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1)	L
EA3	Identification of Risks and Impacts	PC	Conduct / provide evidence of a Climate Change Risk Assessment (CCRA) and incorporate findings and proposed actions into ESIA and relevant management plans.  Provide confirmation that the 3.5 km exclusion zone has been communicated with, and accepted by, the local communities in formal Project documentation.  Confirm by statement that the transboundary movement / export of yellow-cake has no anticipated impacts.	SOMIDA / Environmental Consultants	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1) . CCRA prior to Operation (FEL 4: Stage 3)	L
EA4	Environmental and Social Management and Monitoring Plans	PC	Develop the following policies and management plans and procedures (as a minimum) as part of the CESMP and OESMP: - Safety Health and Environment (SHE) Policy - Hazardous Materials Management Plan - Water Management Plan - Radiation Management Plan - Air Quality Management Plan - Waste Rock Management Plan (this is noted in the ESIA)	SOMIDA	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1)	L
EA5	Emergency Preparedness and Response Plan	PC	Update Emergency Management Plan (EMP) to make consideration for all Project related emergencies. The plan should include communities and how they will be informed and protected.	SOMIDA	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1) ; thereafter ongoing	M
EA6	Management Systems, Monitoring, and Review	PC	The ESIA contains an ESMP that describes mitigation and monitoring measures for the Project, but some updates are required. An internal ESMS is required to implement and track the requirements of the ESMP and CCES. The following is required: - Develop and implement a formal Framework ESMS - Provide applicable outstanding management plans for review. - Document and formalise detailed frequency and locations for monitoring in the ESMP. Consider monitoring type, location and frequency recommendations made in IFC EHS General Guidelines.	SOMIDA / Environmental Consultants	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1) ; thereafter ongoing	L
EA7	Non-Technical Summary (NTS)	NC	Produce a NTS of the Project and the ESIA outcomes and management measures and provide to lenders for review prior to being disclosed to affected communities.	SOMIDA	As soon as possible	L
<b>IFC PS2 Labour and Working Conditions</b>						
L1	Supply Chain	PC	Apply and record agreed supply chain standards and agreements within SOMIDA contracting system at appropriate timings.	SOMIDA	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1)	L

IFC PS3 Resource Efficiency and Pollution Prevention						
R1	Resource Efficiency	PC	Energy and Water efficiency to be adequately addressed in ESIA update. The following is to be developed: - Energy Efficiency Management Plan - Water Management Plan	SOMIDA	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1)	M
R2	Greenhouse Gas (GHG) Emissions	PC	As the estimated emissions are >25,000tpa, monitoring procedures should be developed in order to quantify GHG emissions annually.	SOMIDA	Prior to commencement of operations (FEL 4: Stage 3)	L
R3	Water Consumption	PC	Develop Water Management Plan - consideration must be given to include more water conservation measures as per the IFC EHS General Guidelines.	SOMIDA	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1)	M
R4	Air Quality	PC	In addition to the provision of an Air Quality Management Plan (if required), the following is recommended: - ESIA to be updated to with the regulated standards for emissions; note if the increase in emissions expected for the Project are within or exceed recommended limits. - Monitoring parameters for the construction and operation phase should be improved through the inclusion of more frequent monitoring and more details on the monitoring methods, locations, and alert levels, as well as communication channels with local communities. - The ESMP should be updated with additional internationally recognised dust management measures (see as per the IFC EHS General, and IFC EHS Mining Guidelines). - The ESIA and HSEMP should specify the impacts of silica and radioactive dust emissions and control measures of such to protect workers and surrounding communities.	SOMIDA / Environmental Consultants	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1)	M
R5	Water Resources	PC	Develop Water Management Plan detailing water balance, management system, long term impacts on the aquifers, and proposed mitigation measures.	SOMIDA / Environmental Consultants	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1)	M
R6	Waste	PC	Update Waste Management Plan (as part of CESMP and OESMP; plan to take cognisance of measures included in the IFC EHS General Guidelines and IFC ESH Guidelines for Mining).	SOMIDA / Environmental Consultants	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1)	L
R7	Hazardous Materials	PC	Develop SOMIDA / Project specific Hazardous Material Management Plan (as part of CESMP and OESMP; plan to take cognisance of measures included in the IFC EHS General Guidelines and IFC ESH Guidelines for Mining).	SOMIDA / Environmental Consultants	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1)	M
R8	Uranium and Radiation	PC	The following is recommended: - Develop Radiation Management Plan - Down-wind dispersal impacts to be noted.	SOMIDA / Environmental Consultants	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1)	H
IFC PS4 Community Health, Safety, and Security						
CHSS1	Community Health and Safety	PC	Develop Community Health, Safety and Security Management Plan - Health, Safety and Environmental Management Plan is focused on workers, and not on the local community.	SOMIDA	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1)	L
CHSS2	Community Exposure to Hazardous Materials	NC	Develop SOMIDA / Project specific Hazardous Materials Management Plan (also as part of CESMP and OESMP) and incorporate hazardous materials into a Community Health, Safety and Security Management Plan	SOMIDA	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1)	M
CHSS3	Community Exposure to Disease	PC	ESIA and relevant Management Plans to be updated to include impacts, mitigation and control measures for exposure to communities (currently the focus is on workers).  HSEMP needs to include exposure and risks associated with diseases.	SOMIDA	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1)	L
CHSS4	Emergency Preparedness and Response Plans	PC	Update EMP to make consideration for all Project related emergencies. The plan should include communities and how they will be informed and protected. This EMP is to be disclosed to the local communities.	SOMIDA	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1)	L
CHSS5	Security Personnel	PC	Address risks and procedures associated with the employment and deployment of security personnel.	SOMIDA	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1)	L
IFC PS5 Land Acquisition and Involuntary Resettlement						
No corrective actions proposed (the Project will not result in the physical displacement of populations and the Project is compliant with any potentially applicable requirements of this Performance Standard).						
IFC PS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources						
B1	Critical Habitat Assessment (CHA)	PC	Complete Habitat mapping to confirm CH qualifying features.  Note mitigation / protection measures for the identified species of conservation concern and / or species protected under Niger legislation.	SOMIDA / Environmental Consultants	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1)	L
B2	Biodiversity Management Plan (BMP)	PC	The following is recommended: - Further details should be provided on how biodiversity mitigation measures will be actioned or implemented. - BMP should be more specific to the baseline in the Project area and should incorporate the findings of the baseline and CHA. - BMP to include specific measures for endangered birds and woody species protected by Niger legislation.	SOMIDA / Environmental Consultants	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1)	L

B3	Supply Chain	PC	Specific note of biodiversity protection measures must be included in the contractor ESMP and these procedures will apply to contractors and sub-contractors working on the site or delivering goods and services. The ESMS systems and verification practices must provide to evaluate primary suppliers and to take actions to manage/control biodiversity risks posed through the supply chain.	SOMIDA	Prior to construction (FEL 4 : Stage 2)	L
<b>IFC PS7 Indigenous Peoples</b>						
IP1	Avoidance of adverse impacts	PC	The following is recommended: - Nature and extent / degree of impact on Indigenous Peoples (IPs) needs to be sufficiently quantified and included in the ESIA update. - The migratory routes that may be a source of impact are to be presented in the ESIA update as evidence that they are not impacted by the Project.	SOMIDA / Environmental Consultants	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1) and thereafter ongoing	L
IP2	Impacts on Lands and Natural Resources Subject to Traditional Ownership or Under Customary Use	PC	The decision of FPIC is based on the substantiation provided. However, the review of documents has not made it evident that the 3.5km exclusion zone has been communicated with and accepted by the local communities in formal documentation. This needs to be provided in formal documentation.	SOMIDA	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1)	M
IP3	Mitigation and Development	PC	Illustrate plan for timely and equitable delivery of agreed measures.	SOMIDA	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1)	M
<b>IFC PS8 Cultural Heritage</b>						
CH1	Protection of Cultural Heritage	PC	A Culture and Archaeology Report was provided for review however does not include all mitigation measures noted in the ESIA. This Report is to be updated with all mitigation measures and should instead be presented as a Heritage Management Plan.	SOMIDA	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1)	L
<b>Equator Principles</b>						
<b>Principle 2: Environmental and Social Assessment</b>						
EP2	The ESIA should propose measures to minimise, mitigate and where residual impacts remain, to compensate / offset / remedy for risks and impacts to workers, affected communities and the environment.	PC	Project is largely compliant with EP2 however outstanding assessments of impacts as noted in IFC (such as CCRA and impact on aquifers), and note of additional proposed mitigation measures prevent full compliance. See actions for IFC PS's above, and ESDD Report.	SOMIDA	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1)	M
<b>Principle 4: Environmental and Social Management System</b>						
EP4	For all Category A projects, the EPFI will require the client to develop and/or maintain an ESMS.	PC	Project is largely compliant with EP4 however SOMIDA is to develop and implement their formal Framework ESMS with systematic steps and operational tools for managing the environmental and social performance needs to developed and implemented.	SOMIDA	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1)	L
<b>Principle 10: Reporting and Transparency</b>						
EP10	The client will ensure that, at a minimum, a summary of the ESIA is accessible and available online that includes a summary on human rights and climate change impacts where relevant.	NC	Produce a NTS of the Project and the ESIA outcomes and management measures and provide to lenders for review prior to being disclosed to affected communities.  Undertake CCRA.	SOMIDA	As soon as possible	L
<b>Annex A: Climate Change: Alternatives Analysis, Quantification and Reporting of GHG Emissions</b>						
EP_A	The CCRA should address the current and anticipated climate risks to the projects operations and whether the client has plans to mitigate, transfer, accept or control the identified risks.	PC	Undertake CCRA and update ESIA with findings.	SOMIDA	CCRA prior to Operation (FEL 4: Stage 3)	L
<b>Additional International Standards</b>						
<b>International Atomic Energy Agency Standards</b>						
IAEA1	Fundamental Safety Principles for Protecting People and the Environment	PC	The requirements under these Principles are partially covered in the documents supplied for review, and will be fully compliant once the requested updates above are undertaken. In terms of Plans and Procedures that still need to be updated or developed for compliance with this Standard, these following is required: - Develop and implement a Framework ESMS - Develop and Radiation Management Plan - Develop the SOMIDA Health and Safety Policy - Update EMP to include emergencies relating to radiation.	SOMIDA	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1)	L
IAEA2	Regulations for the Safe Transport of Radioactive Material	PC	To achieve compliance the Transport Procedure is to be formally developed and approval from the relevant authorities obtained.	SOMIDA	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1)	L
<b>Organisation for Economic Co-Operation and Development (OECD) and Nuclear Energy Agency (NEA) Leading Practices for Managing Environmental and Health Impacts of Uranium Mining</b>						
OECD_NEA1	Leading Practices	PC	While largely in alignment with these leading practices, as with the above, the following is required: - Develop and Radiation Management Plan - Transport Procedure is to be formally developed and approval from the relevant authorities obtained. - Update EMP to include emergencies relating to radiation.	SOMIDA	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1)	L
<b>International Council on Mining and Metals Mining Principles and Tools for Environmental and Social Performance</b>						

ICMM1	Principles and Tools	PC	While largely in alignment with these Principles and Tools, as with the above, the following is required: - Finalise a SOMIDA Health and Safety Policy - Develop Energy Efficiency Management Plan - Develop Water Management Plan	SOMIDA	Prior to finalisation of Project Design and Planning (FEL 4: Stage 1)	L
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For all Corrective Actions, prepare timeline for implementation

**ESAP Timeframe Description**

- FEL 4**  
 Stage 1: Design and Project Planning  
 Stage 2: Construction  
 Stage 3: Operations  
 Stage 4: Decommissioning and Closure

**Hatch Front-End Engineering Design (FEED) Project Stages**

