

**ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP)
PROJECT Tobene IPP Phase2 # 37808**

Environmental and Social Action Plan (ESAP):

	Description of the action item	Indicator of completion	Completion Date (end of Month)	Status Review	Supporting
	Performance Standard 1				
1	<p>Develop and implement an environmental and social management system (ESMS) encompassing all elements of IFC Performance Standard (PS) 1. Key aspects covered in Tobene's ESMSs will include:</p> <ul style="list-style-type: none"> ∞E&S organization ∞Contractor management program to supervise their compliance with legal requirements and IFC PSs; ∞Monitoring and reporting (internal and external) of key E&S performance indicators to assess the effectiveness of the ESMS; ∞Periodic reporting to and review of E&S performance by board and senior management 	<p>(a) ESMS documentation developed as described above and in line with IFC PS 1. The documentation to be sent to IFC.</p> <p>(b) Provide evidence of implementation including:</p> <ul style="list-style-type: none"> ∞ Management communication to all workers; ∞ Action plans with assigned budgetary resources; ∞ Evidence of training of workers on the ESMS; and ∞ Example of E&S performance indicators and monitoring reports. 	<p>(a) June 2017 (b) December 2017</p>	<p>(a) Closed (b) Closed, based on existing EMS, we are still awaiting IFC comments to improve</p>	<p>(a) ESMS documentation previously submitted (b)</p>
2	<p>Hire a social expert, approved by IFC, to undertake</p> <p>(a) Exclusion zone: A baseline study should be performed to identify the number of people undertaking activities in the security perimeter zone outside of the project fence as specified in the ESIA (dated March 2013). These mapping of people and type of crops harvested will be updated regularly to ensure</p>	<p>(a) Hire a social expert (b) Submit baseline study (c) Submit stakeholder engagement plan (SEP).</p>	<p>(a) June 2017 (b) August 2017 (c) June 2017</p>	<p>(a) Closed (b) Closed (c) Closed</p>	<p>(a) Tropica Hired (b) Baseline Previously Submitted (c) SEP submitted to IFC + MoM of second meeting c the TP/Communi Committee (3)</p>

	<p>information is accurate.</p> <p>(b) Develop and implement a stakeholder engagement plan (SEP) as a framework to have effective and on-going engagement with relevant stakeholders in line with the IFC Performance Standards.</p>				
3	<p>Develop and monitor a livelihood restoration plan for the people that were economically displaced through Senelec's land acquisition process for the 4.5 ha assigned for the Tobene power plant. This should be performed by an experienced social expert. Monitoring plan should include implementation of mitigation measures (for example local hiring, purchasing of agricultural goods, etc).</p>	<p>(a) Hire a social expert</p> <p>(b) Submit livelihood restoration monitoring report, including additional livelihood restoration indicators and mitigation measures.</p>	<p>(a) June 2017</p> <p>(b) August 2017</p>	<p>(a) Closed</p> <p>(b) First draft expected by end of Feb</p>	<p>Tropica Engaged</p> <p>(b) Methodology approved by IFC</p> <p>(c) Surveys Approved by IFC</p>
Performance Standard 2					
4	<p>(a) Develop and implement the following procedures related to: (a) non-discrimination in terms of recruitment and hiring, compensation, terms of employment, access to training, job assignment, promotion, termination of employment, and disciplinary practices; (b) respect workers' rights to form or to join workers' organizations; and (c) provision of a safe and healthy work environment for direct workers, contractors, and sub-contractors.</p> <p>(b) Communicate to all workers, irrespective of the type of working contract (direct employees, contractors/sub-contractors) in a format and a language they can understand at the time of employment all provisions under their terms of employment, including the grievance mechanism.</p>	<p>(a) Submit updated procedures.</p> <p>(b) Submit evidence that HR manual and terms of employment are communicated to all workers irrespective of the type of working contract (direct employees, contractors/sub-contractors) in a format and language they can understand.</p>	<p>(a) March 2017</p> <p>(b) March 2017</p>	<p>(a) Closed</p> <p>(b) Closed</p>	<p>(a) Procedures already submitted</p> <p>(b) HR Manual Already Submitted</p>

5	Incorporate HR policies, procedures and terms of employment requirements into the contractual agreements with main contractors and sub-contractors.	Submit evidence that the requirements mentioned are incorporated into the contractual agreement with main contractors and sub-contractors.	March 2017	Closed	Examples of contract already submitted
6	Implement and strengthen OHS management system, including the following: (a) Establish joint management-worker OHS committee and provide the required training and time for the committee to effectively monitor health & safety aspects throughout the lifecycle of the project. (b) Perform job hazard analyses by a qualified professional for all job positions. (c) Install warning signs on site. (d) Develop safe work procedures and OHS illustrated manual(s) adequate to targeted audience.	(a) Submit evidence of approval of the OHS committee and first meeting minutes (b) Submit results of job hazard analyses. (c) Submit evidence of installed hazard warning sign on site. (d) Submit safe work procedures and illustrated OHS manual.	(a) March 2017 (b) June 2017 (c) April 2017 (d) July 2017	(a) Closed (b) Closed (c) Closed (d) Closed	(a) Already Submitted (b) Already Submitted (c) Already Submitted (d) Already Submitted
Performance Standard 3					
7	Conduct monthly ambient air sampling (NOx, SOx, and PM) to demonstrate that ambient air quality is within relevant standards. The location of the sampling points and analytical techniques for the determination of the concentrations of pollutant in the ambient air will be reviewed and executed by an experienced specialist. Based on the results of this evaluation, implement any additional pollution control measures required to further reduce stack emissions to comply with relevant emissions guideline for the applicable airshed, degraded or non-degraded.	(a) Hire company and equipment to undertake the monitoring (b) Submit monitoring reports every six months for 24 months.	(a) June 2017 (b) First report August 2017	(a) Closed (b) Closed	(a) LAME already Engaged for NOx/SOx (b) Monthly Results 2017 submitted (
8	Engage a consultant, approved by the lenders, to confirm that there are no cumulative impacts on the quality of the airshed due to the operation of the neighboring mine and associated power plant.	(a) Hire international environmental consultant (b) Submit confirmation results	(a) June 2017 (b) December 2017	(a) Closed (b) Closed	(a) Ramboll (b) Initial results submitted (1), Draft of Final Report (1.2)

9	Conduct regular environmental noise assessment (every 3 months) that focuses on the closest receptors to the power plant (not only at site boundary) and confirm compliance with national regulation and IFC/WBG EHS guidelines.	Submit analytical results every six month for the first 24 months and within the Annual Monitoring Report on a longer term.	July 2017	Closed	Closed, December results attached (2)
10	Conduct regular analysis of the water effluents of the project (every month), including all parameters covered in the Senegalese legislation and IFC/WBG EHS guidelines (covering among other the petroleum hydrocarbons, oils.)	Submit analytical results every six month for the first 24 months and within the Annual Monitoring Report on a longer term.	June 2017	Closed	Closed, June Results already submitted, December Results attached (6)
11	Develop and implement a spill prevention and control plan, including installation of secondary containment wherever liquid hazardous materials or liquid wastes are stored, and provision of emergency response equipment (e.g. spill response kits, self-contained breathing apparatus, safety showers and eye-wash fountains) close to the areas where hazardous materials are stored.	Submit evidence of documentation and implementation of the spill prevention and control plan.	July 2017	Closed	Plan already shared a photos of emergency response equipment submitted
Performance Standard 4					
12	Establish communication protocols with nearby communities to warn them in case of an emergency, and indicate if evacuation of the area is required.	Submit evidence of implementation of communication protocols with nearby communities in case of an emergency. Provide results of a mock drill involving nearby communities.	August 2017	Closed	Communication with the community is done via the committee. In case of emergencies/accident the procedure as per POI is implemented (5.2). A drill was already performed report attached (5.1-5.2)
13	Build a fence and install warning signs around the treated wastewater evaporation pond to prevent access from people and livestock.	Submit evidence of construction of fence around the evaporation pond.	March 2017	Closed	Evidence submitted
14	Develop Security Personnel policy and procedures. These will include: (i) security personnel have been screened; (ii) security	Submit evidence of policy and procedures	July 2017	Closed	Policy and Procedure already submitted

personnel has clear objectives and work orders; (iii) security personnel are trained in accordance with good industry practices; (iv) security incidents are recorded, investigated and corrective actions implemented; and (v) there is a grievance mechanism for community members and employees in the case of an incident.				
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