

Environmental, Health & Safety and Social Action Plan (EHSS Plan) for the Obajana Cement Company Ltd PLC (OCP)– Dangote Industries Ltd (DIL)- Nigeria

Actions		Timeline	Reporting	Remarks
EHSS Management System - OCP				
1.	Development and approval of an EHSS Policy for OCP, endorsed by its top management.	1Q 2005	Direct to IFC	Policy to be satisfactory to IFC. Draft 'Safety, Health, Environmental and Social Policy Statement' sent to IFC January 2005 for comment. OCP policy needs to demonstrate clear alignment with DIL (corporate) policy.
2.	Formalization of EHSS responsibilities and reporting lines. To include: • designation of EHSS responsibility at the OCP Board level; • designation of EHSS responsibility at the OCP Management Group level; • designation of EHSS responsibility with the 'designated operator' (ACC or other) and reporting lines (including relationship to SHECAU); • clarification of the reporting line for the Manager of SHECAU; • clarification of reporting lines between the OCP Health, Safety, Environment and Community Affairs Unit (SHECAU) and the corporate ESU and other relevant corporate teams (e.g. HIV/AIDS).	1Q 2005	Organisational chart showing EHSS responsibilities sent directly to IFC, updates via annual monitoring report (AMR)	Top level commitment must be evident, as well as a clarity between the roles of SHECAU and the corporate ESU.
3.	OCP SHECAU. The manager and five advisory posts within the Safety, Health, Environment and Community Affairs Unit (SHECAU) have been filled with suitably qualified individuals.	2Q 2005 and Co1 st D	Direct to IFC	A draft organisational structure for SHECAU was discussed and agreed with IFC during Q3 2004.
4.	Induction/orientation training for SHECAU staff.	2Q 2005	Direct to IFC	In order to fulfil their responsibilities, SHECAU staff will need to be aware of the corporate EHSS management system and the work of the ESU. They will also need to understand the operations OCP and the roles and responsibilities of key OCP personnel and contractors. Specific 'induction' efforts will therefore be required to ensure SHECAU staff are integrated into the operational processes.

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5.	EHSS plan for OCP. Compilation of a plan, to the satisfaction of IFC, which describes how OCP will implement the commitments described in its EHSS policy.	2Q 2005	For first year, via quarterly reports. Subsequently yearly via AMRs.	The OCP EHSS plan should pick up on any corporate commitments but needs to be highly specific to the OCP context. Objectives and targets, for instance, should focus on the desired improvements at the plant site. The plan should provide a clear blueprint as to how EHSS issues will be managed at OCP. The draft 'Safety, Health, Environmental and Social Policy Statement' provides some initial detail on which to build. A critical aspect to include is the relationship between the designated operator (ACC or other) and OCP and who will be held accountable for what.
6.	Management of contractors. Clear evidence that all contractors on site abide to OCP performance requirements, including applicable labor laws and standards. OCP EHSS monitoring and review processes must include contractor performance.	2Q 2005	For first year, via quarterly reports. Subsequently yearly via AMRs.	Management of contractors is one aspect of the EHSS plan but has been highlighted as a specific action due to the number of contractors at the plant site.
7.	EHSS Monitoring Plan. Production of a detailed EHSS monitoring plan for OCP operations, with monitoring frequencies, methodologies, responsibilities, document control (record keeping) and calibrations/verification processes clearly defined.	2Q 2005	For first year, via quarterly reports. Subsequently yearly via AMRs	Monitoring is one aspect of the EHSS plan but has been highlighted due to the number of monitoring parameters, which include those identified in: - the cement plant-power plant EIA; - the dam EIA; - the pipeline EIA; - the quarry EIA; - the Influx Management and Community Development Plan; - the Watershed Management Plan. Other monitoring parameters are likely to be identified as the EHSS management system is development and the plant becomes operational. The above list is NOT exhaustive.

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8.	Annual OCP EHSS Performance Review. Compilation of a review document which describes how OCP assessed the performance of its EHSS management system and any proposed changes in order to improve its effectiveness for the subsequent year.	4Q 2005	Annually via the AMR	Review and adaptation of the EHSS system is a key indicator of its integration into the business processes of OCP. IFC will need be assured that results from the monitoring program are being reviewed and where necessary, corrective and preventative actions are being identified and implemented.
9.	Independent EHSS performance review. OCP to commission independent consultants (satisfactory to IFC) to perform an assessment of the adequacy and effectiveness of the OCP EHSS management system. Consultant recommendations to be reviewed by OCP and incorporated into EHSS management system.	2Q 2006	Consultant's report to be shared with IFC	The consultant who undertakes the review must be focused on performance of the system, not the supporting paperwork. IFC will assist with appropriate Terms of Reference.
Other Actions				
10.	Road traffic. Determine social and environmental impacts of increased truck traffic on roadside communities, including access, accident frequency and community health risks. Mitigation, monitoring and ongoing management of these issues must be incorporated into the OCP EHSS plan, including driver safety training and community road safety programs. For the truck fleet used to serve the project, the following need to be included in the EHSS plan (for both DIL-OCP owned vehicles and contractor vehicles): - trucks which meet applicable Nigerian standards (e.g. for emissions); - use of qualified drivers who have been trained in defensive driving techniques; - routine inspection and maintenance program.	2Q 2005	Initial results direct to IFC, ongoing monitoring and management actions through AMR.	Impacts from truck movements are likely to be one of the most significant for local communities. The requirements for the truck fleet (including driver qualifications) will need to be maintained as a documented system available for inspection (audit).

11.	Compensation for Loss of Biodiversity. Identify options for compensation for the loss of 530 ha of Guinea Savannah type of vegetation.	2Q 2005 for initial proposal	Initial proposal direct to IFC, progress reports via the AMR.	The OCP operation will directly impact several hundred hectares and with a broader 'footprint' beyond that. OCP operations will also make formerly remote, unexploited areas of land more accessible. Opportunities exist to conserve natural habitat while also safeguarding traditional usage rights for local communities. Options include: • protection of the River Oinyi watershed. This is the IFC preferred option as it brings broader benefits to the project (e.g. erosion control); • extension of an existing forest or game reserve located in Kogi State; • financial compensation; a national ecological fund exists in which the Dangote Group could deposit an amount of money that will be spent for biodiversity conservation in the country.
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Additional Environmental Assessments		Timeline	Reporting	Remarks
12.	Integrated Waste Management Plan. This scope of the plan to include the waste generated at the plant, the quarry, the housing colony, contractor compounds and Obajana village. Information should be provided on the preferred waste treatment, recycling or disposal options. Plan should clearly distinguish between hazardous and non-hazardous wastes.	2Q 2005 for initial plan	Initial plan direct to IFC, subsequently via AMR.	The waste management plan should be integrated in the overall environmental management system and as such, should include assessment of impacts, proposed mitigation, monitoring and management procedures.
13.	Complete all individual compensation associated with land acquisition for the project (with the exception of the pipeline).	3Q 2005	Direct to IFC.	This should include both compensation for land acquired to date, and any additional compensation required to fill any identified gaps between previous compensation paid and required government compensation.
14.	Development and implementation of an AIDS awareness and prevention program, based on the program under development with IFC Against AIDS at the corporate level.	1Q 2005 for initial plan, 2Q 2005 for implementation.	Initial plan directly to IFC, subsequently through AMR	While the corporate AIDS program is not a project requirement, a specific program for OCP needs to be because of the high risks to the project.
15.	Develop with the local government and assist in implementing a malaria control program for the Obajana area.	3Q 2005	Initial program description directly to IFC, subsequently through the AMR.	
16.	Implement the Influx Management and Community Development Plan	Based on schedule in the plan.	Through the AMR.	