

Table 1: CAPIC Protea Nigeria (28300) Environmental and Social Action Plan

Item #	Issue & Task (Description of the requirement to be met by the project proponent)	Indication of Completion (Objective evidence to be supplied by project proponent to IFC)	Required Completion Date (Calendar date, condition of disbursement etc.)
1	Inform IFC should any projects be considered beyond the current project brief as described in the Environmental and Social Review Summary.	• Submission of EIA to IFC.	• On completion of draft EIA for project, but no later than 60 days prior to the start of construction on any such project.
2	Submission of copies of Environmental Impact Assessment and Letter of Approval for all projects prior to construction commencing.	• Submission of EIA reports/letters, as per project delivery.	• 30 days prior to commencement of construction.
3	Ensure that a comprehensive environment health and safety plan, (including an indication of how compliance is to be ensured), is included in all final construction contracts.	• Written confirmation with copy of relevant section from tender documentation for individual projects.	• Prior to commencement of individual construction projects.
4	Ensure that the hotel manager has predefined environmental and social management systems/procedures in place prior to the opening of the hotels.	• Submission of social and management systems/procedures for each hotel.	• 30 days prior to commencement of hotel operations.
5	Compile procedures for the: • Monitoring of potable water based on World Health Organizations requirements; • Monitoring of waste water quality as per General EHS Requirements; • Compliance with Life, Fire and Safety plans, including annual inspections by relevant government agency; • Solid waste management; • Reporting on the above information so	• Submission of procedures. • Annual submission of information.	• 30 days prior to commencement of hotel operations.

Item #	Issue & Task (Description of the requirement to be met by the project proponent)	Indication of Completion (Objective evidence to be supplied by project proponent to IFC)	Required Completion Date (Calendar date, condition of disbursement etc.)
	as to ensure consistency between hotels. The procedures defined above are to be applied to all hotel facilities.		
6	Appoint a responsible person for implementing the Action Plan.	• Submission of name, along with Action Plan and budget.	• Condition of Commitment.
7	Review Conditions of Agreement as applicable to hotels under the CAPIC Protea Nigeria hotel banner to ensure consistency with PS2 Labor and Working Conditions.	• Submission of Conditions of Agreement.	• Condition of first disbursement.
8	Confirm that both hotels will include sewage waste water treatment plans that comply with IFC's Performance Standard 3.	• Submission of documentation (engineering drawings etc) confirming compliance.	• Condition of First Disbursement
9	Undertake an independent review of the new hotel designs (i) prior to construction and (ii) within 30 days of the facility being operational to confirm compliance with international Fire, Life and Safety Standards.	• Submission of independent review.	• 30 days prior to construction • After 30 days of facility being operational
10	Make EIA documentation and Letter of Approval available in public places as agreed with IFC 30 days prior to commencement of construction for any specific project.	• Documented correspondence confirming agreement on disclosure for individual projects.	• Condition of commitment • Annual submission.
11	Compile an annual environmental and social action plan for disclosure at individual facilities.	• Annual submission of action plans.	• 30 days after end of fiscal year
12	Demonstrate compliance with an international food safety standard within 6 months of operations commencing.	• Auditable system in place	• Within 6 months of operation.