

KPLC: Environmental and Social Action Plan (ESAP): September 2011

PS	Action	Completion Indicator	Timetable
2	Develop and implement Human Resources Policy consistent with Performance Standard 2: Labor and Working Conditions.	Submission of agreed Human Resource Policy to IFC.	Condition of first disbursement.
3	Develop and implement a standardized Environmental Management Plan that is acceptable to IFC and to be applied to all projects.	Submission of standardized EMP.	Condition of first disbursement.
3	Compile and implement procedures related to the following: <ul style="list-style-type: none"> • The refilling of transformers inclusive of the disposal of contaminated material; • The management and disposal of vehicle oil at all operations inclusive of the vehicle yard located in Nairobi; and • The management of solid waste during operations. 	Submission of agreed procedures to IFC. Submission of evidence confirming implementation of procedures e.g., records confirming training of personnel.	Condition of first disbursement.
3	Agree with IFC on a time based schedule for rehabilitation of the transformer repair yard in Nairobi inclusive of measures to contain potential on-site spills and enhance stormwater management.	Submission of agreed time-based schedule.	Condition of first disbursement.
3	Undertake a contamination assessment of the transformer repair yard located in Nairobi against agreed Terms of Reference and by an organization acceptable to IFC.	1. Submission of agreed Terms of Reference. 2. Written confirmation from IFC agreeing on organization to undertake the assessment. 3. Submission of report on assessment findings.	1. Condition of first disbursement. 2. Three months following first disbursement. 3. Six months following first disbursement.
3	Based on the findings of the contamination assessment referred to above, agree with IFC on a time-based schedule for implementation of the recommendations defined in the assessment.	Submission of agreed time-based schedule.	One month following receipt of final report on contamination assessment.
3	Initiate a process to investigate options for the safe disposal of treated wooden utility poles, in consultation with pole suppliers,	Submission of procedure to IFC along with documented evidence confirming engagement with relevant stakeholders.	Six months following first disbursement.

	building contractors and NEMA so as to regulate disposal and minimize health risks. The outcome of this process is to be defined in a procedure to be applied to the ongoing disposal of poles.		
3	Construct a bunded, covered area for the storage of used oil at the Nairobi vehicle yard.	Submission of evidence to IFC confirming suitable storage area for used oil.	Condition of first disbursement.
3	Install oil/water separators on the primary stormwater drains discharging from the yard.	Submission of evidence to IFC confirming installation of oil/water separators.	Condition of first disbursement.
3	Undertake an assessment to determine the most effective approach to identifying the possible risk of PCB's being present in transformer oil in an ongoing basis. The outcome is to be agreed with IFC and documented in a defined procedure to manage the risk. Further, the procedure must detail measures to be implemented should PCB's be identified.	Submission of agreed procedure to IFC. Confirmation of ongoing implementation to be submitted via the Annual Monitoring Report.	Six months following first disbursement.
4	Develop and implement emergency response plans for all facilities.	Submission of documented emergency response plans for all facilities. Confirmation of ongoing implementation of the plans e.g., verification of annual fire drills, to be submitted via the Annual Monitoring Report.	Six months following first disbursement.