

Environmental and Social Action Plan (ESAP) for Petra Williamson (#28574)

#	Action Description	Indicator of Completion	Timeframe
1	An ESIA and revised EMP relating to the expansion project and compliant with the IFC Performance Standards is being prepared and will be submitted to the Government prior to the commencement of construction. The ESIA and EMP will be submitted to IFC for review and will be disclosed by WDL on its website. This will include the location of compliance points and physical, chemical and biological target limits for the new operation, which will be based on consolidated monitoring data presented in the MTL Annual Environmental Performance Report (2010). The finalized set of compliance criteria and compliance points will be incorporated in the WDL Environmental Management System.	ESIA and revised EMP submitted to IFC for review.	Prior to commencement of construction (date to be advised to IFC)
2	Modify the ToR and format for the annual independent external EHS audit to include progress on development and implementation of the Community Development Programme. The annual audit should also demonstrate compliance with IFC Performance Standards and Guidelines and with the ESRS and ESAP. The ToR will be developed between Petra / WDL and IFC. Petra will provide the audit report to IFC as an Annual Monitoring Report (AMR) and will disclose the report on its website and to local communities.	ToR and format agreed with IFC.	Modified ToR to be used for the 2010 calendar year audit
3	Existing communication with local communities will be formalized in a Stakeholder Engagement Plan (SEP) following the reference “ Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets (May 2007) ”. As part of the SEP, WDL will prepare a Grievance Mechanism to be disclosed publicly. In addition, WDL will provide regular feedback to local stakeholders (at least annually) on implementation of agreed environmental and social mitigation measures related to impacts that could affect them.	SEP provided to IFC.	Details of annual feedback process included in AMR.
4	Ensure all new Management and WDL Security personnel and contractors are trained in the principles and procedures for compliance with the Voluntary Principles on Security and Human Rights.	Training materials provided to IFC.	31 August 2010.
5	Conduct hydrological investigations to: a) identify groundwater location and flows; b) prepare water balance to define sustainable water surface and groundwater resources that will ensure sufficient year-round provision of process and community water for the expanded project; c) implement key recommendations arising from these investigations including installation of monitoring boreholes; d) monitoring of village drinking water sources and e) link results to EMP and Annual Monitoring Report.	Details included in EMP	31 March 2011
6	Investigate effluent quality from sewage treatment ponds and make appropriate engineering modifications to ensure effluent compliance with Tanzanian standards for irrigation as well as IFC EHS guidelines.	Details included in EMP	31 March 2011
7	Retain an appropriately qualified independent expert to periodically monitor the ongoing raising and operation of the Slimes Dams, throughout the life of the mine. Frequency of monitoring to be determined by the initial risk review.	Reports included in annual audit as appropriate.	First report submitted prior to restart of dam operation.
8	Establish an accrual funding mechanism (e.g.: escrow account, sinking fund) for the a Mine Closure & Rehabilitation Plan and include details in the EMP.	Details included in the EMP	31 March 2011
9	Build management capacity within WDL by appointing a full time Community Liaison Officer	Appointment letter made available to IFC.	31 August 2010
10	The Emergency Preparedness and Response Plan will be finalized and disclosed to local communities. This will cover high hazard materials such as Hydrofloric Acid which will be phased out as soon as possible.	EPRP to be included in EMP	31 March 2011

11	The Malaria programme will be strengthened through the employment of a vector control team to identify and eradicate potential mosquito breeding grounds (eg: used tyres, standing water). Spraying of such sites will be used as appropriate.	Details to be included in EMP	Immediate
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