

**ENVIRONMENTAL AND SOCIAL ACTION PLAN – PART II**  
**Universal II #28604**  
**Silhouette Island Resorts Limited (SIRL)**  
**March 17, 2010**

Item	Action	Completion Indicator	Timetable
<b>PS1: Social and Environmental Assessment and Management Systems</b>			
1.	SIRL to put in place a SEHS management system (SEMS) as described in the ESRS, which is certified to an internationally recognized standard acceptable to IFC, with IFC Performance Standards appropriately incorporated.	SIRL has provided to IFC a copy of certification of its SEMS for conformance to an internationally recognized standard	Within 12 months of first disbursement
2.	SIRL to develop a baseline for the Critically Endangered sheath-tailed bat and the two Critically Endangered sub-species of mud-turtle. If a baseline has already been developed by the Nature Protection Trust of the Seychelles (NPTS), SIRL will provide this existing baseline data.	SIRL Resort has provided baseline data available with NPTS for these three species.  Data collected through additional baseline studies, as required, for these three species	By end-May 2010  By end of August 2010
3.	SIRL will establish a Scientific Committee, acceptable to IFC, to determine the nature of marine baseline study required with respect to the current turtle nesting activity on Anse La Passe beach and any other sensitive marine resources within the resort footprint. This may include as review and revision of the resorts current mitigation activities with respect to the marine habitat.	SIRL Resort has:  (i) Constitute a Scientific Committee, acceptable to IFC, to determine the nature of marine baseline study required  (ii) the Terms of Reference, for the Scientific Committee accepted by IFCs  (iii) Terms of reference and baseline survey plan developed by the Scientific Committee, accepted by	(i) and( ii) Prior to first disbursement  (iii) August 2010  (iv) by July 2011

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		IFC.  (iv) provided the marine baseline data as per the Terms of Reference for the baseline study agreed at (iii) above.	
4.	SIRL will implement the required actions in the action plan developed by ERM as part of the Scoping Study and Gap Analysis dated February 2010.	SIRL to provide evidence, acceptable to IFC, confirming full implementation of the required actions included in the action plan developed as part of the Scoping Study and Gap Analysis	Within 12 months of first disbursement
	<b>PS2: Labor and Working Conditions</b>		
1.	SIRL to upgrade its HR policies to make these consistent with IFC PS2 including: the disciplinary procedure; inclusion of specific timeframe for various steps in the grievance redress procedure; provision for protection of confidentiality and non retribution in the grievance redress procedure; implementation of procedures to maintain full legal documentation for all employees who are below 18 years of age; and maternity leave provision in SIRL Resort's HR Policy	Upgraded policies, procedures and practices accepted by IFC	Prior to first disbursement
	<b>PS3: Pollution Prevention and Abatement</b>		
1.	SIRL will upgrade the existing incinerator to	Full upgrade of incineration facilities completed	Within 6 months of first

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	meet Good International Industry Practice emission norms .		disbursement
2.	SIRL will implement measures including increasing DG set stack height as recommended by the EIA and/or secondary control techniques so as to bring down the ambient NOx levels to within IFC guideline limits.	Stack height increase and secondary control techniques implementation completed	Within 12 months of first disbursement
3.	SIRL will implement a program to: (a) label, segregate and store all hazardous wastes under secondary containment; and (b) maintain records of all hazardous waste generated and disposed. Management of scrap yard needs to be improved	Detailed note on facilities and procedures for hazardous waste and scrap management proposed to be provided by SIRL accepted by IFC  Full implementation of the measures detailed in the above note	Prior to first disbursement  Within 12 months of first disbursement
4.	SIRL will upgrade the Sewage Treatment Plant to meet national standards on Phosphates, BOD and suspended solids.	Sewage Treatment plant upgraded and monitoring results indicate compliance with national standards	Within 6 months of first disbursement
5.	SIRL will carry-out a onetime full characterization of the incinerator ash	Copy of ash characterization report provided to IFC	Prior to first disbursement
6.	SIRL will: identify and phase out WHO Class I (highly hazardous) and II (moderately hazardous) pesticides; and introduce	Detailed note on the measures implemented accepted by IFC	Within 6 months of disbursement

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	integrated pest management and integrated vector management.		
<b>PS6: Biodiversity Conservation and Sustainable Natural Resource Management</b>			
1	SIRL will establish a Scientific Committee that will be responsible for identifying: (a) the Biodiversity Offset for the hawksbill marine turtle (e.g., turtle monitoring program on Grande Barbe Beach); and (b) any additional measures, which are aligned with the conservation aims including any future management plan for the marine park, that SIRL needs to implement to ensure that its operations and activities are synchronized with the conservation aims including any future management plan for the marine park.	SIRL has:  (i) constituted a Scientific Committee, which has been accepted by IFC  (ii) provided the Terms of Reference for the agreed upon offset type and park additional program, which includes the mode of implementation (including identification of implementation agency), responsibilities, budget and timeline.	Prior to first disbursement  Within 3 months of first disbursement
2	SIRL will implement the identified biodiversity offset and additional measures for the marine park	SIRL has:  (i) provided the Implementation Plans for both the offset and the additional program  (ii) provides biannual updates on the on-going implementation of the offset and the additional program	(i) Within 6 months of first disbursement  (ii) Every six months starting January 2011
3	SIRL will implement a biodiversity monitoring program for the following species:	SIRL has provided the biodiversity monitoring program for these three species, which includes the implementation	By end-August 2010

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	<ul style="list-style-type: none"> <li>- Sheath-tailed bat</li> <li>- Two sub-species of terrapin</li> <li>- Hawksbill turtle</li> </ul> <p>Monitoring will be designed with in-country species specialists. If monitoring programs are on-going, SIRL will provide support to such efforts.</p>	<p>method for such a plan, as approved by relevant species specialists.</p>	
4	<p>SIRL will stop use of: WHO Class I and II pesticide; and pesticides along pathways that lead into the freshwater aquatic environment,</p> <p>SIRL will undertake benchmark assessment of freshwater aquatic environment for the marshland site, including metrics for pesticide accumulation.</p> <p>Based on the assessment findings, if required, the SIRL will develop appropriate mitigation program in consultation with relevant specialist</p>	<p>SIRL has provided contractual agreement with Pest Controller demonstrating this.</p> <p>The SIRL has provided the aquatic assessment report acceptable to IFC</p> <p>Detailed mitigation plan, if required, provided to IFC</p>	<p>Prior to first disbursement</p> <p>By end-August 2010</p> <p>October 2010</p>
5	<p>Regarding on-site mitigation measures for the hawksbill turtle, SIRL will:</p>	<p>The SIRL has provided (i) evidence of the contractual arrangement with the marine turtle specialist and the Terms of Reference; (ii) a summary of findings report of</p>	<p>By end-August 2010</p>

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	<ul style="list-style-type: none"> <li>(i) Engaged a marine specialist to conduct an evaluation of on-site mitigation measures in place for the hawksbill turtle.</li> <li>(ii) undertake implementation of additional on-site mitigation measures for hawksbill turtle, based on the findings of the evaluation and as recommended by the marine specialist.</li> <li>(iii) develop a hawksbill turtle frequentation map in coordination with the marine turtle specialist.</li> </ul>	agreed, additional on-site mitigation measures to be implemented for the hawksbill turtle based on the evaluation; and (iii) the frequentation map.	
6	SIRL will develop an ecological sensitivity map of on-site sensitive biodiversity features to help guide the implementation of related mitigation measures such as effluents discharge. The map will be developed in coordination with the relevant species specialists.	SIRL has provided the ecological sensitivity map with written evidence of approval from the relevant species specialists.	By end-October 2010
7	<p>Regarding on-site mitigation measures for the sheath-tailed bat, mud turtles, SIRL Resort will:</p> <ul style="list-style-type: none"> <li>(i) Conduct assessment with pest manager, in coordination with bat specialist, to help reduce the amount of fogging near bat</li> </ul>	<p>The SIRL has:</p> <ul style="list-style-type: none"> <li>(i) provided the assessment and proposed follow-up activities based on the findings</li> <li>(ii) and (iii) provided the results of the review and a list of on-site mitigation measures to be</li> </ul>	By end-August 2010

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	<p>cave roost and/or identify measures to otherwise improve habitat quality / food source for this species.</p> <p>(ii) Review all resort's existing on-site mitigation measures with on-site bat specialist and mud turtle specialist to determine if there are remaining gaps.</p> <p>(iii) Implement recommendations from the findings of activities (i) and (ii)</p> <p>(iv) Establish an arrangement for the gardeners to be seconded to NPTS regularly.</p>	<p>implemented and mode of implementation (i.e., integration into EMS)</p> <p>(iv) provided a Memorandum of Understanding or some other type of evidence of the arrangement.</p>	
8	SIRL will reduce solid waste accumulation in marshland area and hiking trails by providing further awareness-raising to staff.	SIRL has provided evidence that this aspect is further incorporated into staff training.	By end-August 2010
<b>PS8: Cultural Heritage</b>			
1	SIRL will put in place a procedure for periodic checks of the culturally significant sites to identify and mitigate, if any, adverse impacts from its operations, tourist or other activity.	Procedures implemented by SIRL accepted by IFC	By end-May 2010