

SENAC

SUPPLEMENTAL ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP)

To the ESIA and requirement under the concession agreement

ACTION	DELIVERABLE	DEADLINE
INTEGRATED MANAGEMENT SYSTEM		
1. SENAC will appoint qualified individual acceptable to IFC to have responsibility and authority for environmental, health and safety matters at the company. The role will be clearly defined in a written job description.	Provide IFC with Terms of References and CV of each person responsible for environmental, health and safety matters.	<ul style="list-style-type: none"> • Condition of first disbursement
2. SENAC will strengthen its Environmental and Social (E&S) Management System by incorporating the following elements: (i) staff responsible for EHS issues and terms of reference; (ii) training on EHS issues such as occupational health and safety, life and fire safety, human resource policy (see PS2 below), (iii) permits requirements; 3. SENAC will ensure that a third party E&S consultant will verify its monitoring information. 4. SENAC will require that the EPC Contractor implement a chance find procedure. 5. SENAC will implement the ESIA action plan to the extent of its responsibility under the concession agreement.	<ul style="list-style-type: none"> • Submission of the revised Environmental and Social Management System 	<ul style="list-style-type: none"> • Prior to disbursement.
LABOR AND WORKING CONDITIONS		
6. SENAC will strengthen its Human Resources (HR)	<ul style="list-style-type: none"> • Provide IFC with an 	<ul style="list-style-type: none"> • Condition of first

documentation by integrating its policy and procedures into one document and cover the following areas in line with IFC Performance Standards: (i) formulate an HR Policy; (ii) promotions; (iv) grievance mechanism; (v) the right to freedom of association; code of conduct and reference relevant law from the Senegalese Labor Law as applicable. A copy of this document should be available to each staff.	updated HR policy statement.	disbursement
POLLUTION PREVENTION AND ABATEMENT		
7. SENAC will develop and implement through agreements with local authorities an emergency response plan in place that includes procedures for handling spills of substances that may lead to pollution of surrounding areas and for handling the release of hazardous substances.	a) Updated Emergency Response Plan b) Drills with all plan participants with post-drill evaluations and plans to improve any deficiencies.	Prior to the opening of the highway Twice annually starting 1 month prior to the opening of any one section of a highway.
COMMUNITY HEALTH, SAFETY AND SECURITY		
8. SENAC will seek to have a memorandum of understanding with the National Police governing the enforcement of traffic regulations on the toll road. This memorandum will include provisions for informing National Police authorities of any credible allegations of unlawful or abusive acts during enforcement.	Transmittal of the memorandum of understanding to IFC or formal refusal of the National Police.	Prior to the opening of the highway .
LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT		
9. SENAC will put in place a procedure to confirm that all people have been, in fact, resettled from the right of way according to the approved Resettlement Action Plans prior to accepting the handover.	Provide IFC with the procedure.	3 months prior the first handover of right of way for the section Pikine to Keur Massar.