

Bakhresa: Africa Region – Environmental and Social Action Plan (March 2010)

PS #	Issue & Task (Description of the requirement to be met by the project proponent)	Indicator of Completion (Objective evidence to be supplied by Project Company to IFC)	Required Completion Date (Calendar date, condition of disbursement)
Social and Environmental Assessment and Management Systems			
1	Complete an overall Environmental and Social Action Plan that includes the following: 1. The EIA's Environmental Management Plan. 2. The conditions of approval as defined in the environmental license. 3. The occupational health and safety plan as referenced below. 4. The stakeholder engagement as defined below. 5. The tasks as detailed in this Environmental and Social Action Plan (ESAP).	1. Final EIA. 2. EIA License. 3. Submission of overall Action Plan.	1. Prior to commencement of construction. 2. Condition of first disbursement.
1	Appoint a responsible and qualified person for implementing the Action Plan.	1. Submission of name and associated curriculum vitae.	1. Prior to commencement of construction. 2. Condition of first disbursement.
1	Include the requirement for a comprehensive Environmental Management Plan and occupational health and safety plan, including an indication of how compliance is to be ensured, in tender documentation for the new mill as submitted to construction companies.	1. Copy of relevant section from tender documentation.	1. Prior to commencement of construction. 2. Condition of first disbursement.
1	Obtain certification for the Hazard Analysis Critical Control Points (HACCP) food safety program and ISO 9001 for the mill in Nacala.	1. Certification certificates.	1. One year from commencement of operations. 2. Positive covenant.

1	Notify IFC prior to commencing with any development for which the standby loan will be utilized. Thereafter, comply with IFC requirements to ensure any development is undertaken in accordance with the Performance Standards and applicable EHS Guidelines.	1. Written correspondence to IFC prior to development confirming project details. 2. Compliance with IFC's requirements.	1. Positive covenant.
Pollution Prevention and Abatement			
3	Initiate a potable water quality monitoring program consistent with the World Health Organization (WHO) guidelines.	1. Submission of monitoring plan. 2. Annual submission of monitoring data.	1. Within 3 months from commencement of operations. 2. Positive covenant.
3	Compile a plan for the on and off-site management of storm-water.	1. Stormwater management plan.	1. Prior to commencement of construction. 2. Condition of first disbursement.
3	Develop and implement a pest management program consistent with the requirements of IFC PS3: Pollution Prevention and Abatement.	1. Submission of pest management plan.	1. Within the first six months of operations. 2. Positive covenant.
Labor and Working Conditions			
4	Initiate and institute an ongoing stakeholder engagement program which includes the adjacent communities. As a minimum, this is to include regular (bi-annual) reporting on environmental and social issues associated with the construction phase and annual reporting on the operational phase.	1. Community engagement plan 2. Feedback as provided to stakeholders.	1. Condition of first disbursement. 2. Positive covenant.
4	Develop a training program to be applied to company wide operations for drivers focusing on improving road safety and HIV/AIDS awareness training.	1. Submission of driver training program.	1. Condition of first disbursement.

Land Acquisition and Involuntary Resettlement

5	Conduct an audit of the resettlement process conducted in Nacala by a qualified social consultant. The audit should include: • Detailed description of resettlement undertaken including a review of local regulatory procedures; • Gap analysis of the resettlement process relative to the requirements of IFC Performance Standard 5: Land Acquisition and Involuntary Resettlement; • The proposed Resettlement Action Plan for bridging the found gaps and achieving compliance with the requirements of IFC Performance Standard 5; and • A Framework for monitoring the implementation of the Resettlement Action Plan and achieving compliance with IFC Performance Standard 5.	1. Stages of completion include; i) agreement with IFC on the Terms of Reference, audit timing and the selection of the social consultant; ii) submission to IFC of the audit report which includes the defined requirements and; iii) agreement with IFC on the timing of implementation of the proposed Resettlement Action Plan and framework for monitoring its implementation.	1. Condition of first disbursement.
5	Implement the Resettlement Action Plan in accordance with the schedule agreed with IFC	1. Provide documented evidence of completion of each action of Resettlement Action plan to IFC's satisfaction.	1. Positive covenant.