

LCT

SUPPLEMENTAL ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP) To the ESIA

ACTION	DELIVERABLE	DEADLINE
INTEGRATED MANAGEMENT SYSTEM		
<p>1. LCT 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.</p> <p>2. LCT will appoint a person responsible for supervising the implementation of the Resettlement Action Plan (RAP).</p>	<ul style="list-style-type: none"> • Provide IFC with Terms of References and CV of each person responsible for environmental, health and safety matters. • Provide ToR of the designated RAP supervisor. 	<ul style="list-style-type: none"> • 60 days prior to start of construction.
<p>3. LCT will develop an Environmental and Social Management System (ESMS) that will use the action plan drawn from Environmental and Social Impact Assessment (ESIA) as base and put in place programs to ensure that Environmental and Social Management Plan (ESMP) is properly implemented. The ESMS should also include the following: (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 and certification requirements, and international maritime conventions such as MARPOL, SOLAS; (iv) contractors' and subcontractors' compliance requirements and auditing (particularly working conditions and occupational health and safety issues); (v) fire protection and emergency response and preparedness; (vi) monitoring of the implementation of the RAP; (vii) community engagement</p>	<ul style="list-style-type: none"> • Submission of the revised Environmental and Social Management System. 	<ul style="list-style-type: none"> • Prior to first disbursement.

<p>and grievance mechanism, (vii) monitoring and reporting on Environmental and Social (E&S) performance.</p> <p>4. LCT will ensure that a third party E&S consultant will verify its monitoring information.</p> <p>5. LCT will require that the construction contractor implement a chance find procedure.</p>		
LABOR AND WORKING CONDITIONS		
<p>6. LCT will hire a Human Resource Manager.</p> <p>7. LCT will develop an HR policy, and procedures / handbook and cover the following areas in line with IFC Performance Standards 2: (i) formulate an HR Policy; (ii) the Employee Handbook will outline the employees' rights under national labor and employment laws including: (a) the right to freedom of association; (b) compensation system including overtime; (c) working conditions and terms of employment; (d) holidays; (e) sick leave; (f) maternity and other type of leave; (g) insurance benefit and eligibility criteria; (h) access to training; (i) performance evaluation system and promotion; (j) anti-harassment policy; (k) termination of employment; (l) retirement; (m) grievance and feedback mechanism; (n) disciplinary action.</p>	<ul style="list-style-type: none"> • Provide CV and ToR of the selected candidate. • Provide IFC with an HR policy statement. • Provide IFC with a copy of LCT HR handbook. 	<ul style="list-style-type: none"> • 2 months prior to ramping up on staff. • Prior to first disbursement. • 2 months after recruitment of HR Management.
POLLUTION PREVENTION AND ABATEMENT		
<p>8. LCT will develop an oil and chemical spill contingency plan and procedures, as well as a disaster management plan.</p>	<ul style="list-style-type: none"> • Provide copy of the spill contingency plan and procedures and disaster management plan. 	<ul style="list-style-type: none"> • One month prior to start of operation.

LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT		
<p>9. LCT will include in its ESMS a procedure to review the Resettlement Action Plan monitoring report and provide feedback to the Port Authority, Ministry of Mining and IFC on non compliance with IFC PS5.</p> <p>10. LCT will continue to collaborate with the Port Authority and the Ministry of Mining in the implementation of the RAP in accordance to IFC PS5.</p>	<ul style="list-style-type: none"> • Provide IFC with copy of the LCT ESMP. • Provide IFC with a copy of the RAP monitoring report including LCT comments on any non compliance observed. 	<ul style="list-style-type: none"> • Prior to commencement of work in the area with affected people. • No later than 60 days after LCT has received report.
BIODIVERSITY, CONSERVATION AND NATURAL RESOURCES MANAGEMENT		
<p>11. LCT will incorporate the turtle and mangrove management plan in its ESMS and work with experts in the implementation, monitoring and evaluation of the above plans.</p> <p>12. LCT will ensure that the turtle management plan will be incorporated into the construction contractor's EMP and implemented during construction activities to avoid or minimize the impacts.</p>	<ul style="list-style-type: none"> • Provide IFC with the list of committee members and professional affiliation. • Provide IFC with the ToR of the committee. 	<p>Prior to first disbursement.</p>