

Roofings, Environmental and Social Action Plan (ESAP), May 17, 2010

Item	Action	Completion Indicator	Timetable
PS1: Social and Environmental Assessment and Management Systems			
1.	Obtain certification for ISO 14001: 2008 for the Roofings operations in Lubowa.	Certificate confirming certification.	October 2010.
2.	Obtain certification for OHSAS 18001 and SA 8000 for the Roofings operations in Lubowa.	Certificates confirming certification.	October 2011.
3.	<p>a) Obtain certification for ISO 9001: 2008, ISO 14001: 2004, OHSAS 18001 and SA 8000 for phase 1 operations.</p> <p>b) Undertake a baseline occupational health and safety audit by an individual acceptable to IFC of the Roofings facility in Lubowa and phase 1 operations to confirm compliance relative to:</p> <ul style="list-style-type: none"> • National legislation; • The requirements of OHSAS 18001; and • IFC's EHS Guidelines. <p>Note: The audit is to include a review of hazardous materials storage against international best practice.</p> <p>c) Based on the findings of the audit, agree with IFC on implementation of a corrective action plan.</p>	<p>a) Certificates confirming certification.</p> <p>b) Submission of agreed curriculum vitae / audit report.</p> <p>c) Agreed action plan.</p>	<p>a) July 2011.</p> <p>b) Condition of first disbursement.</p> <p>c) 2 months following completion of audit.</p>
4.	<p>a) Obtain certification for ISO 9001: 2004, ISO 14001: 2004, OHSAS 18001 and SA 8000 for phases 2 and 3 within one year of commencing operations.</p> <p>b) Undertake an audit by an individual acceptable to IFC as per the scope of the tasks defined above for the phase 2 and 3 operations. Based on the audit findings, agree with IFC on implementation of a corrective action plan.</p>	<p>a) Certificates confirming certification.</p> <p>b) Submission of agreed curriculum vitae / audit report / action plan.</p>	<p>a) For phase 2, December 2011 / for phase 3, December 2013.</p> <p>b) Within three months of start of operations.</p>
5.	Appoint an experienced quality, environmental and health and	Submission of curriculum vitae and	Condition of first disbursement.

	safety manager.	appointment letter / contract.	
6.	Develop and implement an emergency response plan for the Roofings operations in Lubowa and phase 1.	Submission of emergency response plans.	Condition of first disbursement.
7.	Develop and implement a community grievance mechanism in accordance with IFC's Performance Standards and incorporate the mechanism into the Company's ISO 14001: 2004 environmental management system for all operations.	Submission of agreed grievance mechanism.	Condition of first disbursement.
8.	<p>Compile a detailed Environmental Management Plan for all future construction activities at phases 2 and 3. This is to include:</p> <ul style="list-style-type: none"> - Management measures for solid and liquid waste (including stormwater), dust generation, storage and use of hazardous materials and hydrocarbons, soil erosion and stockpiling of materials; - Management measures for soil erosion and conservation (i.e., stockpiling of topsoil); - A procedure for community engagement including a mechanism of receiving and resolving community grievances and complaints; - A method by which Roofings (where applicable) and the contractors application of their occupational health and safety system to the construction phase will be monitored (as a minimum OHS national legislation is to be used as the benchmark for compliance); - A procedure defining measures to be undertaken by the construction companies to limit the impact of HIV/AIDS; and - A schedule defining when construction activities will be audited against the EMP. 	Submission of EMP.	Condition of first disbursement.
9.	<p>a) Appoint an independent consultant to monitor compliance of construction activities against the EMP.</p> <p>b) Submit audits to IFC as per the defined auditing schedule in the EMP.</p>	<p>a) Documented evidence confirming appointment.</p> <p>b) Submission of audit reports.</p>	<p>a) Condition of first disbursement.</p> <p>b) Submission of audit reports as per schedule defined in the ESAP.</p>

PS 2: Labour and Working Conditions			
10.	Make available medical services comparable with Roofings's existing operations in Lubowa at the phase 1 and 2 operations.	Documented proof e.g., submission of photographs confirming establishment of a clinic and written confirmation confirming scope of services offered.	December 2010.
11.	<p>a) Undertake a review of existing sub-contractors human resources documentation for phase 2 to confirm compliance with Performance Standard 2: Labor and Working Conditions.</p> <p>b) Include the requirement for compliance with Performance Standard 2: Labor and Working Conditions, in the contract documentation for prospective companies tendering on Phase 3.</p>	<p>a) Submission of review confirming compliance / actions required to affect compliance within an agreed time schedule.</p> <p>b) Submission of relevant section from contract documentation.</p>	<p>a) Condition of first disbursement.</p> <p>b) Positive covenant.</p>
PS 3: Pollution Prevention and Abatement			
12.	<p>a) Undertake monitoring of discharge from the septic tanks at the Lubowa operations to confirm compliance with national standards and IFC's EHS Guidelines / agree on a corrective action plan to ensure compliance if necessary.</p> <p>b) Implement the corrective action plan.</p>	<p>a) Submission of monitoring data / agreed action plan.</p> <p>b) Documented evidence confirming implementation.</p>	<p>a) October 2010.</p> <p>b) December 2010.</p>
13.	<p>Install a waste water treatment plant to treat sewerage from all 3 phases of the Project which:</p> <ul style="list-style-type: none"> - Can accommodate the volume of waste water as generated by the operations; and - Complies with national standards and IFC's requirements for treated waste water. 	<p>a) Provision of signed contract with service provider confirming procurement details, time table for plant installation and that the plant will comply with IFC's Performance Standards.</p> <p>b) Installation of waste water treatment plant.</p>	<p>a) October 2010.</p> <p>b) December 2010.</p>
14.	<p>a) Undertake monitoring of the waste water from the phase 1 pickling line by an accredited laboratory to assess water quality relative to IFC's EHS Guidelines (April 2007).</p> <p>b) Based on the findings of the monitoring and expected volume and quality of phase 3 process waste water, agree with IFC on a plan to ensure safe disposal of the waste water.</p>	<p>a) Submission of water quality data and associated report detailing findings.</p> <p>b) Solution implemented and discharged effluents meet IFC guideline requirements.</p>	<p>a) Condition of first disbursement.</p> <p>b) December 2010.</p>

15.	Develop a waste management program for Roofings existing operations in Lubowa, phase 1 and phase 2. The plan is to define all wastes generated by operations and proposed methods of reuse, recycling, treatment (if required to ensure safe disposal) and disposal.	Submission of agreed waste management plan.	Condition of first disbursement.
16.	Submit to IFC supplier information for the induction furnace confirming the baghouse availability and anticipated emission relative to the standards defined in IFC's EHS Guidelines (April, 2007)	Submission of requisite information.	Condition of first disbursement.
17.	<p>a) Undertake stack emission monitoring within three months of operation for the induction furnace by a company acceptable to IFC.</p> <p>b) Undertake annual stack emission monitoring of the induction furnace to confirm compliance with IFC EHS Guidelines (April, 2007).</p>	<p>a) Agreement on applicable company / submission of monitoring data.</p> <p>b) Submission of monitoring report via Annual Monitoring Report.</p>	<p>a) January 2011.</p> <p>b) Annually.</p>
18.	<p>a) Develop a stormwater plan for phase 1,2 and 3 which defines:</p> <ul style="list-style-type: none"> - Methods for separating clean and potentially contaminated stormwater; - Treatment options for contaminated stormwater, if required; and - Off-site disposal requirements. <p>Note: The management plan is to be confirmed with UIA and NEMA.</p> <p>b) Define a schedule for implementation in agreement with IFC.</p> <p>c) Implement the agreed stormwater management plan according the defined schedule.</p>	<p>a) Submission of stormwater plan.</p> <p>b) Submission of agreed implementation schedule.</p> <p>c) Submission of documentation confirming implementation e.g., photographs, confirmation from contractor.</p>	<p>a) Condition of first disbursement.</p> <p>b) Condition of first disbursement.</p> <p>c) Positive covenant.</p>
19.	Develop and implement a ground water monitoring program compliant with IFC EHS Guidelines.	Submission of agreed monitoring program and annual reporting thereon.	December 2010.
20.	Provide bunding for the oil storage tanks which provides for containment of 110% capacity of the tank/s capacity.	Photographic evidence confirming bunding.	Before first oil delivery.

21.	Compile a solid, liquid, and gaseous waste management plan for phase 3 operations.	Submission of waste management plan.	Three months before start of Phase 3 operations.
PS 4: Community Health, Safety and Security			
22.	<p>a) Undertake a noise assessment by an organization acceptable to IFC to define ambient noise quality over a 24 hour period at the Roofings facility in Lubowa. Noise levels are to be compared against the standards as defined in IFC's EHS Guidelines (April, 2007).</p> <p>b) Implement mitigation measures as defined in the noise assessment.</p>	<p>a) Submission of information on the organization to undertake the survey / submission of noise monitoring report.</p> <p>b) Documentation confirming implementation of mitigation measures.</p>	<p>a) Condition of first disbursement.</p> <p>b) Positive covenant.</p>
23.	<p>a) Undertake a risk assessment by a qualified risk assessor acceptable to IFC to determine the risks posed by; i) the existing LPG storage facility; ii) the future capacity to be installed on-site; iii) the transport of LPG from Mombassa and; iv) the use of LPG on-site.</p> <p>b) Based on the risks identified, mitigation measures are to be defined and an implementation schedule agreed with IFC.</p> <p>c) Review adequacy of risk management plans and comprehensiveness of their implementation three months after commencement of phase 3 operations.</p> <p>The risk assessment is also to review the life, fire and safety procedures and control mechanisms for the Roofings facility in Lubowa, phases 1, 2 and 3. Recommendations are to be provided to ensure compliance with IFC's EHS Guidelines (April, 2007).</p>	<p>a) Submission of agreed curriculum vitae.</p> <p>b) Submission of risk assessment and implementation schedule</p> <p>c) Audit report.</p>	<p>a) Condition of first disbursement.</p> <p>b) Condition of first disbursement.</p> <p>c) Four months after start of phase 3 operations.</p>
24.	Submit to IFC plans to limit the potential impact of traffic on the community located adjacent to the access road leading to operations within the industrial park. This plan is to be discussed with the affected community, the UIA and Kampala Municipality.	Submission of traffic management plan confirming discussions with stakeholders.	a) December 2010.
25.	<p>a) Develop a protocol for armed security personnel which is compliant with IFC's Performance Standards.</p> <p>b) Undertake ongoing training of personnel.</p>	<p>a) Submission of protocol.</p> <p>b) Training records to be submitted with Annual Monitoring Report.</p>	<p>a) Condition of first disbursement.</p> <p>b) September 2010.</p>

PS 5: Land Acquisition and Involuntary Resettlement

26.	a) Undertake an audit by a social specialist acceptable to by IFC to review the compensation plan implemented by UIA to confirm compliance with Performance Standard 5. b) If necessary, implement corrective actions to ensure compliance with Performance Standard 5.	a) Submission of agreed curriculum vitae / audit report. a) Documentation confirming implementing of corrective actions.	a) Condition of first disbursement. b) October 2010.
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