

COMASEL LOUGA

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

ACTION	DELIVERABLE	DEADLINE
INTEGRATED MANAGEMENT SYSTEM		
1. Comasel Louga will appoint qualified individual acceptable to IFC to have responsibility and authority for environmental, health, safety and social matters at the company. The role will be clearly defined in a written job description.	• Provide IFC with Terms of References and CV of the person responsible for environmental, health and safety matters.	• 60 days prior to commencement of construction activities.
2. Comasel Louga will develop an Environmental and Social Management System (ESMS) that will use the Environmental Management 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 collaboration with the relevant authorities such as Eaux et Forets regarding installation/pole locations; (iv) contractors' and subcontractors' compliance requirements and auditing (particularly working conditions and occupational health and safety issues); (v) fire protection and emergency preparedness and response; (vii) community engagement, health and safety and grievance mechanism, (vii) monitoring and reporting on Environmental and Social (E&S) performance.	• Submission of the revised Environmental and Social Management System.	• 60 days prior to commencement of construction activities.

3. COMASEL LOUGA will require that the construction contractor implement a chance find procedure.		
LABOR AND WORKING CONDITIONS		
4. Comasel Louga will hire a Human Resources (HR) professional.	• Provide CV and ToR of the selected candidate.	• 60 days prior to ramping up of staff
5. Comasel Louga will develop a HR procedures / handbook to cover the following areas to ensure compliance with IFC Performance Standards 2 and 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.	• Provide IFC with a copy of COMASEL LOUGA HR handbook.	• 2 months after recruitment of HR professional.
POLLUTION PREVENTION AND ABATEMENT		
6. Comasel Louga will include in its contract with subcontractors that responsibility for the safe recycling and/or disposal of the batteries.	• Provide copy of the contract language to this effect	• 60 days prior to commencement of construction activities.
LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT		
7. Comasel Louga will include in its ESMS a procedure in compliance with IFC PS5 for consultation and compensation when installations have economic impact to human activities or require physical displacement.	• Provide IFC with copy of IFC ESMS.	• 60 days prior to commencement of construction activities.

