

United Water (30502)
Environmental and Social Action Plan (ESAP)

	Action	Deliverable	Due Date
Environmental and Social Management System			
1.	ESHS Positions at Corporate and Operational Levels United Water will (a) either hire or designate an individual on the board of the Company to ensure compliance with group policies, procedures and regulatory requirements, and ensure consistency with good international industry practice for ESHS performance, including IFC Performance Standards and applicable guidelines; and (b) at the operational level, responsibility for the management of environment, health, safety and social performance will be assigned to a senior level staff as a newly established position within the Company. The individuals will together ensure consistency with good international industry practice for ESHS performance and maintain compliance with all regulatory and IFC requirements (including during construction of water/wastewater treatment and associated facilities). Specifically (i) Create positions and advertise with Terns of Reference; and (ii) Employed/In post	Documentary evidence - Positions (2) creation - Reporting line - Hiring notice	(i) COD ¹ – First (ii) + 60 days
2.	Integrated Environmental and Social Management System (ESMS) United Water will integrate ESH&S management into its existing management system to provide continued oversight of ESH&S for all its operations and those of its subcontractors. The management system must ensure consistency with good international industry practice for ESHS performance and maintain compliance with all regulatory and IFC requirements. Specifically, the Management system must include (but not limited to): (i) Adoption of IFC Performance Standards as part of The Company's legal requirements (ii) Screening of business opportunities and service models against IFC Performance Standards (PS 1 through PS 8) and relevant EHS Guidelines. (iii) Oversight of construction activities – labor and OHS issues (iv) Procurement procedures to provide oversight and contractually require that its suppliers and subcontractors comply with national regulatory requirements and United Water's ESHS policies. (v) Integrated OHS functions – training, monitoring, and reporting. (vi) Procedures for communicating environmental and social aspects to external interested parties, including clear procedures for receiving, documenting and responding to concerns from any external interested parties related to the project.	Documentary evidence - Operating Procedure and Policy - Procedures on Community Engagement	(i) COD – First (ii) - (vi) +360 days

¹ Condition of Disbursement

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Labor and Working Conditions			
3.	Working and Living Conditions of Sub-Contracted Labor Review United Water's HR policies, procedures and training program for consistency with good international industry practice – for construction and operational phases. Scope of review should also include worker accommodation and oversight of payment of wages/overtime for operations in China or elsewhere. Specific milestones are: (i) United Water will either hire or designate a qualified individual in the Company for the review of policies in relation to sub-contracted labor and for the preparation of manual for policies and procedures for sub-contracted labor (TOR agreed with IFC) (ii) Completion of proposed policies and draft procedures manual (iii) Policies and procedures manual approved by management committee and communicated to project companies.	Documentary evidence (i) Employee assigned for role and scope of work (ii) Draft procedures manual (iii) Final Procedures manual	(i) COD – First (ii) + 60 days (iii) + 120 days
4.	Workplace Safety Review United Water's OHS policies, procedures and training program for consistency with good international industry practice – for construction and operational phases.. Specific milestones are: (i) United Water will either hire or designate a qualified individual in the Company for the review and monitoring of workplace safety procedures across the group (TOR to be agreed with IFC) (ii) Recommendations for amendments to operational guidelines and execution of such guidelines presented to President of United Water and Vice Presidents of Waste Water Treatment and Water Supply businesses (iii) Implement approved recommendations	Documentary evidence (i) Employee assigned for role and scope of work (ii) Review and recommendation (iii) Implementation plan with resource (management + fiscal) allocation	(i) COD – First (ii) + 60 days (iii) + 120 days
Pollution Prevention and Abatement			
5.	Review and Quantification of Industrial Wastewater Sources United Water will review, identify and quantify industrial sources of wastewater at each of its operations and implement a comprehensive monitoring program for influent to and effluent from BOT facilities operated by United Water. Specific milestones are: (i) United Water will either hire or designate a qualified individual in the Company at each Industrial Wastewater facility for the mapping of all significant industrial customers served and the identification of the industry in which they operate and the risk elements within their waste water discharges with reference to IFC industry discharge standards (TOR to be agreed with IFC)	Documentary evidence (i) Employees identified for role and scope of work (ii) Mapping of major customers and industry discharge risk assessment (iii) Results of sampling and testing	(i) COD – First

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	(ii) Assign responsibility at each Industrial Wastewater facility for a sampling and testing program of at risk water discharges (iii) Assign responsibility for creation of action plan to bring discharge standards within IFC standards. Cure period and resource allocation to be agreed with IFC. (iv) Recommendations for bringing discharge standards within IFC standards presented to Vice President of Waste Water Treatment division.	(iv) Implementation plan with resource (management + fiscal) allocation	(ii) + 60 days (iii) + 120 days (iv) + 180 days
6.	Compliance with applicable IFC Guidelines Tongxiang and Tuoxian The Company will review its plant design and operations to confirm ability to meet applicable standards (IFC Guidelines for industries serviced); and also implement a continuous emission monitoring system. Specifically, The Company will: (i) Provide confirmation from technical expert on ability to comply with IFC/World Bank guidelines (Textile Manufacturing for Tongxiang and Pharmaceuticals and Biotechnology Manufacturing for Tuoxian). If any gaps are identified, the Company will agree on cure period and resource allocation with IFC. (ii) Agree with IFC on scope and resource allocation for a monitoring and reporting program that can reliably and accurately measure relevant parameters to confirm compliance (IFC/WB Guidelines). (iii) Commencement of agreed implementation from (ii)	Documentary evidence and copy of design contract signed by registered design institute confirming design capabilities of the treatment facilities to comply with relevant IFC/WB sectoral guidelines.	(i) COD – First (ii) + 180 days (iii) +240 days
Community Health, Safety and Security			
7.	Update Emergency Response Procedures The Company will review and update its procedures, training and infrastructure to ensure safe operations and emergency response associated with (a) operation of its facilities, and (b) transportation and handling of hazardous gases/chemicals. Updated procedures must include a community involvement component that addresses appropriate behavior and safety measures to be implemented in the event of an unplanned release beyond the plant boundaries due to either irregular plant operations or an accident at the facility, or during transportation of material destined for the facility. Specific milestones are: (i) Retain qualified consultant; (ii) Completion of review by consultant and allocation of resources; (iii) Implement recommendations from consultant review; and (iv) Completion	Documentary evidence (i) Copy of Contract (ii) Consultant Review and Recommendation (iii) Implementation plan with resource (management + fiscal) allocation	(i) COD + 60 days (ii) + 90 days (iii) + 180 days (iv) + 240 days