

**Canvest (36962)**  
**Environmental and Social Action Plan (ESAP)**

	Action	Deliverable	Due Date
<b>Environmental and Social Management System</b>			
1.	<p><b>Integrated Environmental and Social Management System (ESMS)</b>  Canvest will integrate ESHS functions into its existing management system to provide continued oversight of ESHS 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</p> <ul style="list-style-type: none"> <li>(i) Adoption of IFC Performance Standards as part of company's legal requirements</li> <li>(ii) For projects under development and future WtE projects, the environmental and social impact assessment (ESIA) process should establish or confirm project specific performance criteria and emission standards, with the objective that outcomes are protective of human health and environment. Assessments should be based on methodology and model(s) which are recognized in the scientific community as being robust for the application, takes into account dispersion (fate and transport) of pollutants in the specific air shed, and cumulative impact from existing and planned sources of emission.</li> <li>(iii) Oversight of construction activities – labor and OHS issues; and integrated OHS functions – training, monitoring, and reporting.</li> <li>(iv) Procurement procedures to provide oversight and contractually require that its suppliers and subcontractors comply with national regulatory requirements and Canvest's ESHS policies.</li> <li>(v) 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.</li> </ul>	<p>Documentary evidence</p> <ul style="list-style-type: none"> <li>- Operating Procedure and Policy</li> <li>- Procedures on Community Engagement</li> </ul>	<ul style="list-style-type: none"> <li>(i) COD</li> <li>(ii) Ongoing basis</li> <li>(iii) - (v) +360 days</li> </ul>
2.	<p><b>Update Emergency Response Procedures</b>  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:</p> <ul style="list-style-type: none"> <li>(i) Canvest will either hire or designate a qualified individual in the company;</li> <li>(ii) Completion of review and allocation of resources;</li> <li>(iii) Implement recommendations from; and</li> <li>(iv) Completion</li> </ul>	<p>Documentary evidence</p> <ul style="list-style-type: none"> <li>(i) Copy of Contract</li> <li>(ii) Consultant Review and Recommendation</li> <li>(iii) Implementation plan with resource (management + fiscal) allocation</li> </ul>	<ul style="list-style-type: none"> <li>(i) COD + 60 days</li> <li>(ii) + 90 days</li> <li>(iii) + 180 days</li> <li>(iv) + 240 days</li> </ul>

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	Action	Deliverable	Due Date
<b>Labor and Working Conditions</b>			
3.	<p><b>Working and Living Conditions of Sub-Contracted Labor</b></p> <p>Review Canvest’s HR policies, procedures and training program for consistency with good international industry practice. Scope of review should also include payment of wages/overtime, working and living conditions.</p> <p>Specific milestones are:</p> <ul style="list-style-type: none"> <li>(i) Canvest 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)</li> <li>(ii) Completion of proposed policies and draft procedures manual</li> <li>(iii) Policies and procedures manual approved by management committee and communicated to project companies.</li> </ul>	<p>Documentary evidence</p> <ul style="list-style-type: none"> <li>(i) Consultant/Employee assigned for role and scope of work</li> <li>(ii) Draft procedures manual</li> <li>(iii) Final Procedures manual</li> </ul>	<ul style="list-style-type: none"> <li>(i) COD</li> <li>(ii) + 60 days</li> <li>(iii) + 120 days</li> </ul>
<b>Resource Efficiency and Pollution Prevention</b>			
4.	<p><b>Emission Control and Compliance</b></p> <p>For WtE projects currently under development, Canvest will install continuous inline monitoring equipment that can reliably and accurately measure relevant parameters (as established through in ESAP Action # 2 (ii)), prior to commissioning of the facility. Where continuous inline monitoring is not possible for certain parameters, Canvest will develop a monitoring program that is consistent with good international industry practice.</p>	<p>Documentary Evidence and verification by independent technical expert.</p>	<p>Prior to commercial operation</p>