2020 FMCG Import Finance Facility – Guyana
Environmental and Social Action Plan (ESAP)

No.	Aspect	Action	Deliverable	Delivery date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Compliance with National Regulations (Environmental Permits)	1. Prepare a matrix with all required environmental permits and licenses, including validity period	1. Matrix detailing all approvals and environmental permits and licenses	1. Prior to 1st disbursement
		2. Submit a copy of renewed environmental permits and licenses	2. Renewed environmental permits and licenses	2. Prior to 1st disbursement
1.2	Environmental and Social Management System (ESMS)	1. Based on a gap assessment, update the Health Safety, Environment & Quality (HSEQ) Manual and associated procedures by: i) enhancing E&S risk identification; ii) requiring the production of an E&S and risk matrices; iii) defining risk and impact assessment processes in accordance with the expanded business (including not limited to training, organizational chart, EPR procedures, cumulative impacts, chance find procedures, communicable disease and other illnesses, waste management and other risks associated with solar and renewable-energy-related activities); and iv) streamline overlapping management system documents (e.g., HSEQ Manual, Human Resource (HR), grievance, stakeholder engagement).	1. Updated HSEQ Manual and associated procedures.	1. Within 3 months of 1st disbursement.
1.3	Emergency Preparedness and Response (EPR)	1. Submit the Spill Prevention and Response Plan	1. Spill Prevention Plan	1. Prior to 1st disbursement
		2. Prepare a comprehensive EPR plan covering all categories of emergency (natural and man-made)	2. Comprehensive EPR	2. Within 3 months of 1st disbursement
		3. Provide evidence of training for all employees on these plans; and v	3. Training report	3. As part of the ESCR
		4. Submit the annual drill reports	4. Annual drill reports	4. As part of the ESCR
1.4	Organizational Capacity and Competency	1. Confirm appointment for Team Lead and Quality Coordinator positions	1. Proof of appointment	1. Within 6 months of 1st disbursement
1.5	Gender Programs	1. Update HR policies to include paternity leave arrangements and a comprehensive Gender Based Violence (GBV) policy	1. Updated HR policies covering GBV and paternity leave	1. Within 3 months of 1st disbursement
1.6	External communications and grievance management	1. Establish one clearly defined external grievance framework by resolving overlaps among the existing policies and procedures (*Grievance Mechanism for External Stakeholders Procedure*, Customer Complaints Policy, and *Worker and Community Grievance Mechanism*).	1. Defined external grievance framework	1. Within 1 month of 1st disbursement
		2. Update Grievance Mechanism for External Stakeholders Procedure to include scope, reporting channels, confidentiality, anonymous reporting, non-retaliation, grievance intake, assessment, resolution, escalation, closure, tracking, timelines, vulnerable stakeholder provisions, and grievance register requirements.	2. Updated *Grievance Mechanism for External Stakeholders Procedure*	2. Within 3 months of 1st disbursement
		3. Formally approve External Stakeholders Procedure and Customer Complaints Policy	3. Approved External Stakeholders Procedure and Customer Complaints Policy	3. Within 3 months of 1st disbursement
		4. Prepare Stakeholder Engagement Plan (SEP) as part of HSEQ Manual (to include requirement for ongoing reporting to vulnerable groups)	4. SEP	4. Within 3 months of 1st disbursement
PS 2: Labor and Working Conditions				
2.1	Human Resources Policies and Procedures	1. Update HR documents (including Whistle Blowing Policy) to ensure consistency in employment terms and conditions, procedural requirements, provisions recognizing workers' rights to organize and bargain collectively, grievance management, and document control.	1. Updated HR documents	1. Within 3 months of 1st disbursement

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		2. Formally approve supporting HR instruments	2. Approved HR instruments	2. Within 3 months of 1st disbursement
		3. Disseminate revised HR framework to workers	3. Evidence of dissemination	3. Within 4 months of 1st disbursement
2.2	Internal Grievance Mechanism	1. Finalize SOP52 with appropriately activated reporting channels	1. Finalized SOP	1. Within 3 months of 1st disbursement
2.3	Prevention of Child and Forced Labor	1. Revise HR documents to include explicit reference and provisions against child and forced labor	1. Revised HR documents	1. Within 3 months of 1st disbursement
2.4	Occupational Health and Safety	1. Formalize the Heat Stress Policy	1. Formalized Heat Stress Policy	1. Within 1 month of 1st disbursement
2.5	Workers Engaged by Third Parties	1. Update the HSEQ Manual to include a contractor and third-party worker management procedure.	1. Contractor and third-party worker management procedure	1. Within 3 months of 1st disbursement
2.6	Supply Chain	1. Update supplier evaluation and vendor approval processes to incorporate E&S, labor, and human rights requirements, including verification of child and forced labor risks.	1. Update supplier evaluation and vendor approval processes	1. Within 3 months of 1st disbursement
		2. Formalize all applicable procurement procedures to reflect relevant updates.	2. Formalized procurement procedures	2. Within 4 months of 1st disbursement
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Waste Management (including hazardous waste)	1. Update the Waste Management Plan to address the handling, storage, transportation, and end-of-life management of renewable-energy-related waste streams	1. Updated Waste Management Plan	1. Within 4 months of 1st disbursement
PS 4: Community Health, Safety, and Security				
4.1	Security Personnel	1. Update security procedures to include human rights-based training requirements for security personnel	1. Updated security procedures	1. Within 4 months of 1st disbursement