

**Jamaica Public Service Company I (JPS I) – Phase 2  
Environmental and Social Action Plan (ESAP)**

No.	Aspect	Action	Deliverable	Delivery date
<b>PS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>				
1.1	Compliance with National Regulations (Environmental Permits)	1. Maintain permit register containing all requirements from existing and proposed permits and their current implementation status.	1. Permit spreadsheet	1. As part of the Environmental and Social Compliance Report (ESCR)
1.2	Environmental and Social Management System (ESMS)	1. Prepare an ESMS that includes the E&S management policy	1. Finalized ESMS	1. Within six months after first disbursement
		2. Adopt the ESMS.	2. Evidence of implementation	2. As part of the ESCR
		3. As part of ESMS, prepare an E&S identification matrix	3. E&S Risk and Impact matrix	3. Within six months after first disbursement
		4. Update the E&S identification matrix	4. Updated E&S identification matrix	4. As part of the ESCR
		5. Outline a process for identifying E&S risks and impacts linked to business activities (including offices and associated facilities)	5. E&S identification process	5. Within six months after first disbursement
		6. Update the Code of Ethics and Business Conduct and the Sexual Harassment Workplace Policy to include i) zero tolerance provisions towards sexual exploitation of minors and GBV; and ii) workforce trainings/awareness campaigns.	6. Updated Code of Ethics and Business Conduct and Sexual Harassment Workplace Policy	6. Within six months after first disbursement
		7. As part of the ESMS, include a comprehensive Emergency Preparedness and Response Procedure (EPRP)	7. Comprehensive EPRP	7. Within six months after first disbursement
		8. As part of the ESMS, prepare E&S management procedures to i) streamline existing programs while applying the mitigation hierarchy; ii) incorporate the role of relevant actions and events controlled by third parties; and ii) include ESMS auditing.	8. E&S Management Procedures.	8. Within six months after first disbursement
		9. As part of the ESMS provide i) E&S organigram of E&S staff with roles and responsibilities; and ii) and training schedules on E&S management, EPRP, and health, and safety.	9. Organigram with responsibilities and training schedule	9. Within six months after first disbursement
		10. As part of the ESMS, prepare a standalone stakeholder engagement plan (“SEP”) that includes details on: i) information disclosure; ii) process for informed consultation; iii) procedures for private sector responsibilities; iv) grievance process for all identified stakeholder groups including communities; v) vulnerable groups; and vi) ongoing reporting.	10. Standalone Stakeholder Engagement Plan	10. Within six months after first disbursement
		11. Implement the SEP	11. Evidence of implementation	11. As part of the ESCR
		12. Revise Outreach Policy and Procedures to assess KPIs and measure the impact level of the Company’s projects.	12. Revised Outreach Policy and Procedures	12. Prior to first disbursement, and continued as part of ESCR
1.3	Identification of Risks and Impacts	1. Submit a post damage assessment and tracking procedure which will include post-event damage assessments, root-cause and vulnerability analysis, tracking of corrective and resilience-related upgrades, and monitoring of implementation status and resilience KPIs.	1. Damage assessment and tracking procedure	1. Within three months after first disbursement
		2. Implement damage assessment and tracking procedure	2. Evidence of implementation	2. As part of the ESCR
<b>PS 2: Labor and Working Conditions</b>				
2.1	Human Resource Policies and Procedures	1. Update the HR policy to include Occupational Health and Safety (OHS) Act and ILO’s Declaration on the Fundamental Principles and Rights at Work	1. Updated HR Policy	1. Within three months after first disbursement
		2. Submit Employee Disciplinary Code	2. Employee Disciplinary Code	2. Prior to first disbursement
		3. Implement the communication and engagement strategy	3. Evidence of implementation	3. As part of the ESCR

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		4. Provide update on vacancy for HR officer for Industrial Relations	4. Vacancy update or copy of corresponding contract or work assignment	4. Prior to first disbursement
2.2	Grievance Mechanism	1. Finalize Grievance Procedure Policy to ensure that informal grievances can be addressed with anonymity where there are sensitivities or fear of reprisal.	1. Grievance Procedure Policy	1. Prior to first disbursement
2.3	Prevention of Child and Forced Labour	1. Update HR Policy to include explicit reference and provisions against child and forced labor	1. Updated HR Policy	1. Prior to first disbursement
2.4	Occupational Health and Safety	1. Prepare the Safety and Health Management System (SHMS)	1. Safety and Health Management System (SHMS)	1. Within six months after first disbursement
2.5	Supply Chain	1. Update the procurement and OHSE policies to: i) monitor supply chain; and ii) establish procedures and measures regarding avoidance of child/ or forced labor along the supply chain.	1. Updated Procurement and OHSE policies	1. Within six months after first disbursement
		2. Communicate the updated policies to third parties	2. Evidence of communication	2. As part of the ESCR
<b>PS 3: Resource Efficiency and Pollution Prevention</b>				
3.1	Resource Efficiency	1. Perform a corporate internal energy audit (with recommendations to improve energy efficiency via Energy Efficiency Program) for all facilities	1. Energy audit report	1. Within six months after first disbursement, and thereafter as part of ESCR
		2. Implement Energy Efficiency Program	2. Energy Efficiency Report	2. As part of the ESCR.
3.2	Greenhouse Gas Emissions	1. Prepare a Corporate GHG Monitoring and Management Plan	1. GHG Monitoring and Management Plan	1. Within six months after first disbursement
		2. Implement the Corporate GHG Monitoring and Management Plan	2. Evidence of implementation.	2. As part of the ESCR
		3. Prepare carbon offset reports	3. Carbon offset report	3. Within six months after first disbursement, and thereafter as part of the ESCR
		4. Prepare annual GHG emissions report	2. GHG emissions report	4. As part of the ESCR
3.3	Water Consumption	1. Prepare a Water Resources Management Plan to monitor, manage and improve water usage.	1. Water Resources Management Plan	1. Within six months after first disbursement
3.4	Waste Management (including hazardous waste)	1. Prepare site-specific waste management plans according to local requirements	1. Site-specific waste management plans	1. Within six months after first disbursement
		2. Implement the site-specific waste management plans	2. Evidence of implementation	2. As part of the ESCR
		3. Update Waste Management Policy and Plan to include proper disposal for vegetation, and cross-reference to supplementary waste management plans	3. Updated Waste Management Policy and Plan	3. Prior to first disbursement
		4. Implement the Waste Management Plan	4. Evidence of implementation	4. As part of the ESCR
		5. Implement the Asbestos and Asbestos Containing Material Management Program	5. Evidence of implementation	5. As part of the ESCR
		6. Develop management system to streamline management plan for all applicable facilities	6. Management system for organizational waste management plans	6. Within six months after first disbursement
		7. Implement the management system	7. Evidence of implementation	7. As part of the ESCR
<b>PS 4: Community Health, Safety, and Security</b>				
4.1	Community Health and Safety	1. Prepare complaints log regarding air pollution for permitted facilities	1. Complaints log	1. Prior to first disbursement and thereafter as part of the ESCR
4.2	Infrastructure and Equipment Design and Safety	1. Assess the integrity of all operational infrastructure (including all office buildings) to cope with primary identified hazards (including coastal storm surge, floods and earthquakes).	1. Assessment on operational infrastructure	1. Within six months after first disbursement
		2. Perform drills in all offices	2. Drill reports	2. Within three months after first disbursement
		3. Implement drill report recommendations	3. Status report	3. As part of the ESCR

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4.3	Emergency Preparedness and Response	1. Update Hurricane Preparedness Plan as part of the Comprehensive Disaster Management Program and Business Continuity Plan	1. Updated Hurricane Preparedness Plan	1. Within three months after first disbursement
4.4	Security Personnel	1. Prepare a Security Risk assessment	1. Security risk assessment	1. Within three months after first disbursement
		2. Provide a grievance mechanism procedure for any affected stakeholder to express concerns about the security arrangements and acts of security personnel and evidence of incorporation within relevant policies.	2. Grievance mechanism procedure for security personnel	2. Within three months after first disbursement
		3. Implement the grievance mechanism procedure for security personnel	3. Evidence of implementation.	3. As part of the ESCR