

**Trinidad Tissues Limited
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 permit matrix spreadsheet	1. Permit matrix spreadsheet	1. Prior to 1 st disbursement
		2. Obtain the environmental permits and required approvals	2. Copy of environmental permits and approvals	2. Prior to 1 st disbursement
		3. Implement all environmental requirements contained in the corresponding permits and approvals.	3. Proof of implementation	3. As part of the Environmental and Social Compliance Report (ESCR)
		4. Submit report on final architectural building design	4. Report on building design	4. Prior to start of construction
1.2	Environmental and Social Management System (ESMS)	1. Submit internal audit report for ISO 9001	1. Copy of the internal audit report	1. 6 months after 1 st disbursement
		2. Prepare an ESMS that includes: i) an E&S management policy; ii) an impact matrix identifying potential E&S and occupational health and safety (OHS) risks and impacts, as well as associated control measures; iii) management procedures to prevent, mitigate or compensate any undesired E&S impact and OHS risk (as identified in the matrix), and fulfill requirements contained in environmental permits; iv) an organigram of E&S staff and training schedules on E&S management; v) a comprehensive consolidated emergency preparedness and response plan; vi) a stakeholder engagement plan (SEP) including stakeholder mapping, ongoing consultation and reporting, and an internal and external grievance mechanisms with additional channels and consideration for vulnerable groups; vi) a grievance mechanism that outline specific channels for grievance reception, teams responsible, and expected timing of responses; vii) environmental audit procedures; and viii) a schedule to monitor effectiveness of the ESMS.	2. Finalized ESMS	2. 6 months after 1 st disbursement
		3. Train staff on ESMS	3. Training report	3. 9 months after 1 st disbursement and thereafter as part of the ESCR
		4. Present periodic ESMS audit and monitoring reports	4. ESMS monitoring and auditing reports	4. As part of the ESCR
		5. Implementation of the external grievance mechanism	5. Evidence of implementation	5. 6 months after 1 st disbursement
1.3	Organizational Capacity and Competency	1. Designate a community liaison or public relations officer to manage stakeholder engagement and public relations	1. Evidence of designation	1. 6 months after 1 st disbursement
PS 2: Labor and Working Conditions				
2.1	Human Resource Policies and Procedures	1. Update internal Grievance Policy to include a description on i) additional grievance categories including sexual harassment, GBV and discrimination; ii) other specific channels for grievance reception (e.g., e-mail, WhatsApp, or other means); iii) identity protection procedures (i.e., confidentiality, anonymity, sexual harassment, etc.).	1. Updated Grievance Policy	1. 3 months after 1 st disbursement
		2. Disseminate updated Grievance Policy	2. Evidence of dissemination	2. 3 months after 1 st disbursement
		3. Designate Grievance Officer	3. Evidence of designation	3. 3 months after 1 st disbursement
		4. Present periodic accounts of internal complaints received, responses given, and disciplinary actions undertaken	4. Report on internal grievances	4. As part of the ESCR
2.2	Occupational Health and Safety	1. Present annual training plans including scheduled drills	1. Training plans	1. Annually as part of the ESCR
		2. Update Occupational Safety and Health Management Policy (OSHMP) to incorporate elements of the comprehensive EPR	2. Updated OSHMP	2. 6 months after 1 st disbursement
		3. Disseminate updated OSHMP to employees	3. Evidence of dissemination	3. 9 months after 1 st disbursement
		4. Conduct OHS training (including drills for fire and updated emergency response)	4. Training and drill reports	4. As part of the ESCR
		5. Submit OHS report on total man hours, near misses, lost time accidents and lost workdays.	5. OHS report	5. As part of the ESCR

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2.3	Workers Engaged by Third Parties	1. Disseminate Employee Policy and CLRP to contractors and sub-contractors	1. Evidence of dissemination	1. 3 months after 1 st disbursement and thereafter as part of the ESCR
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Resource Efficiency	1. Include in final Project design sustainability features (e.g., renewable energy options and green building design elements)	1. Report on final Project design	1. Prior to 1 st disbursement
		1. Conduct annual energy audits	2. Energy audits	2. 6 months after disbursement for existing operations; and thereafter as part of ESCR for new and existing operations
		2. Implement the recommendations from energy audits	3. Evidence of implementation of measures	3. Annually as part of ESCR
3.2	Greenhouse Gas (GHG) Emissions	1. Submit a GHG Monitoring Plan for operations	1. GHG Monitoring Plan	1. 3 months after 1 st disbursement
		2. Submit a report on GHG emissions	2. GHG emissions report	2. Annually and as part of the ESCR
3.3	Water consumption	1. Incorporate water saving mechanisms (e.g., rainwater harvesting) in the Project	1. Report on implemented water saving features	3. Prior to 1 st disbursement
		3. Submit Water Resource Management Plan (WRMP) for existing operations and the Project which will include rainwater harvesting measures	3. WRMP	4. 6 months after 1 st disbursement
3.4	Waste Management (including hazardous waste)	1. Submit current Water Pollution Rules Registration Certificate (WPRRC)	1. WPRRC	1. Prior to 1 st disbursement
		2. Prepare Waste Management Plan ("WMP") for all waste streams including but not limited to solid, liquid, and hazardous waste,	2. WMP	2. 3 months after 1 st disbursement
		3. Implement WMP	3. Evidence of implementation	3. As part of ESCR
3.5	Hazardous Materials Management	1. Maintain hazardous chemicals inventory	1. Hazardous chemicals inventory	1. Annually and as part of the ESCR
		2. Submit the copy of the hazardous storage permit from Ministry of Health (MOH)	2. Copy of the MOH hazardous storage Permit	2. Prior to 1 st disbursement
3.6	Pesticide Use and Management	1. Maintain pesticide inventory reflecting avoidance of purchase, storage, use, manufacture, or trade of products that fall in WHO Recommended Classification of Hazardous Pesticides	1. Pesticide Inventory	1. Annually and as part of the ESCR
		2. Submit a copy of the pesticide storage permit from MOH	2. Copy of the MOH pesticide storage Permit	2. Prior to 1 st disbursement
PS 4: Community Health, Safety, and Security				
4.1	Community Health and Safety	1. Produce updates on the external grievance mechanism	1. Grievance reports	1. As part of the ESCR
4.2	Infrastructure and Equipment Design and Safety	1. Include in the final project designs i) adequate Fire Safety Systems (FSS) that includes but is not limited to hoses, smoke detectors, fire exits, alarm pull stations and extinguishers; and ii) earthquake, flood risk and measures to alleviate excess heat respectively	1. Certification of inclusion of the requirements in the final Project design	1. Prior to 1 st disbursement
		2. Implement the FSS for Project	2. Evidence of FSS implementation	2. Upon completion of construction, and thereafter as part of the ESCR.
		3. Perform regular tests of the FSS for all facilities to ensure constant operational readiness, including: i) timely recharge of fire extinguishers; ii) periodic fire hose integrity tests; and iii) periodic test of water pump pressure and reach of water jets.	3. Report on fire systems tests	3. As part of the ESCR