

**BARBANCOURT – HAITI**  
**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	<b>E&amp;S Assessment and Management System</b>	Develop an Environmental and Social Management System ("ESMS") aligned with the best international procedures and relevant environmental and social laws in Haiti.	1. The ESMS Manual approved by the Company's General Management.	1. 180 days after first disbursement.
		Implement the Environmental and Social Management System ("ESMS").	2. Evidence of ESMS adoption.	2. Annually, as part of the Project's Environmental and Social Compliance Report ("ESCR").
1.2	<b>Policy</b>	Develop an integrated HSE policy.	1. Integrated HSE policy	1. 180 days after first disbursement.
		Disseminate the Integrated HSE Policy.	2. Evidence of dissemination of the Integrated HSE Policy.	2. Annually, as part of the Project's Environmental and Social Compliance Report ("ESCR").
1.3	<b>Identification of Risks and Impacts</b>	Develop a matrix of E&S hazards and risks associated with the company's activities, including those related to the supply chain.	1. Matrix of E&S hazards and risks.	1. 180 days after first disbursement.
1.4	<b>Management programs</b>	As part of the ESMS, prepare the following plans and procedures: i) air quality, ii) noise and vibration, iii) solid waste, iv) hazardous materials, v) effluents, vi) occupational health and safety, vii) community health and safety, viii) spill prevention and control and countermeasures, ix) contractor management, and x) incident investigation, non-conformance, corrective actions, and preventive actions.	1. Copy of each of the plans.	1. 180 days after first disbursement.
		Implement ESMS plans and procedures	2. ESMS follow up reports.	2. Annually, as part of the Project's Environmental and Social Compliance Report ("ESCR").
1.5	<b>Key Performance Indicators (KPIs)</b>	Define E&S key performance indicators ("KPIs").	1. Key E&S performance indicators.	1. 180 days after first disbursement.
1.6	<b>Organizational capacity and competency</b>	Set up a Quality, Health, Safety and Environment ("QHSE") department with the necessary professionals.	1. Copy of appointment of QHSE team members.	1. 180 days after first disbursement.
1.7	<b>Emergency preparedness and response</b>	Develop an Emergency Preparedness and Response Plan.	1. Emergency Preparedness and Response Plan.	1. 180 days after first disbursement.
		Implementing the Emergency Preparedness and Response Plan	2. Evidence of plan implementation.	2. Annually, as part of the Project's Environmental and Social Compliance Report ("ESCR").
1.8	<b>Grievance Mechanism for Affected Communities</b>	Develop an External Grievance Procedure ("EGP").	1. External Grievance Procedure ("EGP").	1. 180 days after first disbursement.
		Disseminate the External Grievance Procedure ("EGP").	2. Evidence of stakeholder training on the use of EGP.	2. Annually, as part of the Project's Environmental and Social Compliance Report ("ESCR").

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		Setting up the External Grievance Procedure ("EGP").	3. Report on claims submitted and processed by the EGP.	3. Annually, as part of the Project's Environmental and Social Compliance Report ("ESCR").
1.9	<b>Disclosure of Information</b>	Setting up multiple communication channels with communities.	1. Evidence of multiple communication channels with communities.	1. Annually, as part of the Project's Environmental and Social Compliance Report ("ESCR").
1.10	<b>Monitoring and reviewing</b>	Periodically audit ESMS performance (internal or external audit), including the effectiveness of key performance indicators ("KPIs").	1. Reports on internal or external audits.	1. Annually, as part of the Project's Environmental and Social Compliance Report ("ESCR").
<b>PS 2: Labor and Working Conditions</b>				
2.1	<b>Internal Grievance Mechanism</b>	Develop an External Grievance Procedure ("EGP").	1. Internal Grievance Procedure ("IGP").	1. 180 days after first disbursement.
		Disseminate the Internal Grievance Procedure ("IGP").	2. Evidence of employee training in the use of IGP.	2. Annually, as part of the Project's Environmental and Social Compliance Report ("ESCR").
		Setting up the Internal Grievance Procedure ("IGP").	3. Report on claims submitted and processed by the IGP.	3. Annually, as part of the Project's Environmental and Social Compliance Report ("ESCR").
2.2	<b>Occupational Health and Safety</b>	Develop an Occupational Health and Safety ("OHS") Plan that: i) complies with applicable regulatory requirements in Haiti, ii) defines procedures for OHS risk management, iii) follows international best practice guidelines, iv) defines roles and responsibilities for its implementation, v) defines training requirements, and vi) establishes procedures for monitoring the effectiveness of mitigation measures, reporting, and developing and implementing corrective actions.	1. Occupational Health and Safety Plan ("OHS").	1. 180 days after first disbursement.
2.3	<b>Workers Engaged by Third Parties</b>	Implement a procedure to monitor subcontractors' environmental, health and safety (E&S) obligations.	1. E&S control procedures for subcontractors.	1. 180 days after first disbursement.
		Monitor subcontractors' environmental, health and safety (E&S) obligations.	2. Subcontractor E&S monitoring report.	2. Annually, as part of the Project's Environmental and Social Compliance Report ("ESCR").
2.4	<b>Supply Chain</b>	Develop a procedure to control and monitor the environmental, health and safety (E&S) obligations of supply chain workers.	1. E&S procedures for the supply chain.	1. 365 days after first disbursement.
		Present an action plan for implementing the procedure for controlling and monitoring the environmental, health and safety (E&S) obligations of supply chain workers.	2. Action plan for implementing the E&S Procedure for the supply chain.	2. As soon as the country's security situation allows.
<b>PS 3: Resource Efficiency and Pollution Prevention</b>				
3.1	<b>Greenhouse Gases</b>	Present an annual inventory of greenhouse gases ("GHG").	1. GHG Inventory Report.	1. Annually, as part of the Project's Environmental and Social Compliance Report ("ESCR").

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3.2	<b>Water Consumption</b>	Present a hydrogeological study to characterize the groundwater's recharge capacity, with the aim of determining the maximum volume and catchment times to ensure a stable supply of water and the non-affectation of the spring.	1. Report on the hydrogeological study of the groundwater source.	1. 365 days after first disbursement.
		Develop a monitoring plan for water use in all the plant's production processes that includes, at a minimum: i) water measurement for irrigation; distillation; staff and community consumption; and ii) technically potential measures for water reduction and/or reuse.	2. Water usage monitoring plan	2. Annually, as part of the Project's Environmental and Social Compliance Report ("ESCR").
3.3	<b>Wastes</b>	Develop a procedure for managing hazardous and non-hazardous solid waste, including at least: i) volumes; ii) types; iii) management; iv) reduction targets; v) collection, separation, transport, and final disposal of each waste.	1. Hazardous and non-hazardous solid waste management procedures.	1. 180 days after first disbursement.
		Implement solid hazardous and non-hazardous waste management procedures.	2. Evidence of hazardous and non-hazardous solid waste management.	2. Annually, as part of the Project's Environmental and Social Compliance Report ("ESCR").
3.4	<b>Hazardous Materials Management</b>	Carry out an audit to verify compliance with IFC's general health, safety, and environment ("HSE") guidelines for the management of fuel reserves (diesel) for electric generators.	1. Compliance report.	1. 180 days after first disbursement.
<b>PS 4: Community Health, Safety, and Security</b>				
4.1	<b>Infrastructure and Equipment Design and Safety</b>	Hire an independent professional qualified in life safety and fire protection systems ("LSFP") to verify that LSFP system designs of the plant complies with National Fire Protection Association ("NFPA") international standards and the life safety and fire safety ("L&FS") requirements contained in IFC's general health, safety, and environment ("HSE") guidelines.	1. LSFP system report of the plant.	1. 90 days after first disbursement.
		Implement the independent professional's recommendations on the fire protection system.	2. Execution evidence.	3. 365 days after first disbursement.
4.2	<b>Security Personnel</b>	Develop a Security Plan that: i) complies with applicable regulatory requirements in Haiti ii) defines procedures for the management of safety risks, iii) follows international best practice guidelines, iv) defines roles and responsibilities for its implementation, v) defines training requirements and vi) establishes procedures for monitoring the effectiveness of mitigation measures, reporting and the development and implementation of corrective actions.	1. Security Plan approved by the Company's General Management.	1. 180 days after first disbursement.
		Prepare a Code of Conduct for security staff.	2. Code of conduct for security staff	2. 180 days after first disbursement.
		Adopt the Code of Conduct for security staff.	3. Evidence of training and dissemination of the Code to the security staff.	3. Annually, as part of the Project's Environmental and Social Compliance Report ("ESCR").
		Train all security personnel in accordance with: i) the International Finance Corporation's ("IFC") "Manual of Good Practices for the Employment of Security Forces: Assessment and Management of Risks and Impacts"; and ii) the IFC and BID Invest "Guides to Good Practices for the Private Sector: Coping with the Risks of Retaliation against Interested Parties".	4. Evidence of training for security personnel.	4. Before first disbursement.