

**Texila American Expansion Project
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 approvals and environmental permits, including their implementation status.	1. Matrix detailing all approvals and environmental permits	1. Prior to 1 st disbursement
		2. Submit a copy of the environmental and construction permits	2. Copies of the Environmental and Construction permits	2. Prior to 1 st disbursement
		3. Submit technical reports for the design of Project	3. Technical reports	3. Prior to 1 st disbursement
		4. Present to the EPA all environmental requirements contained in the corresponding permits.	4. Proof of report submission to the EPA	4. As part of the Environmental and Social Compliance Report (ESCR)
1.2	Environmental and Social Management System (ESMS)	1. Prepare the ESMS to include: i) an E&S management policy; ii) an impact matrix identifying potential E&S risks and impacts, as well as associated control measures; iii) management procedures to prevent, mitigate or compensate any undesired E&S impact and 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 emergency preparedness and response plan; vi) project-specific monitoring and review procedures vii) a stakeholder engagement plan (SEP) including stakeholder mapping, disclosure, and ongoing consultation; viii) internal and external grievance mechanisms (including vulnerable groups) procedures that outline specific channels for grievance reception, teams responsible, and expected timing of responses; ix) environmental audit procedures; and x) a schedule to monitor effectiveness of the ESMS.	1. Finalized ESMS	1. 6 months after 1 st disbursement
		2. Present periodic ESMS audit and monitoring reports	2. ESMS monitoring and auditing reports	2. As part of the ESCR
		3. Train staff on ESMS	3. Training report	3. 9 months after 1 st disbursement and thereafter as part of the ESCR
1.3	Emergency Preparedness and Response	1. Revise Emergency Action Plan (EAC) to include the hostel and staff accommodations and to cover: i) drill calendars; ii) responses to other emergencies e.g., earthquake, flood (protecting electrical equipment etc.), electrocution; iii) details on maintenance and management of equipment and supplies; and iv) procedures for dissemination of information dispatched during extreme weather events.	1. Revised EAC	1. 6 months after 1 st disbursement
1.4	Organizational Capacity and Competency	1. Designate a Community Relations Officer (CRO)	1. Proof of CRO designation	1. Prior to 1 st disbursement
		2. Hire i) Project Manager (PM) and ii) Construction Manager for construction phase	2. Copy of executed contracts	2. Prior to start of any construction activities
		3. Designate a health, safety, and environment (HSE) manager for the Projects operational phase	3. Job description and proof of designation	3. Upon completion of construction for both sites and prior to formal occupancy
1.5	Environmental and Social Management Plan (ESMP)	2. Prepare Construction Management Plans (CMPs) which include (but are not limited to) measures to manage: i) waste streams; ii) effluents; iii) drainage; iv) communicable diseases; iv) air and dust, noise and vibration impacts; v) traffic; vi) associated cumulative impacts; and vii) contractor management details	2. CMPs	2. Prior to start of any construction activities

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		(project team job descriptions, housing and employment details, sanitation and access to amenities, and policies and procedures for the construction workforce inclusive of OHS, Code of Ethics, grievance mechanism and provisions against provisions against the use of child and forced labor).		
		3. Implement the CMPs	3. Evidence of implementation.	3. As part of the ESCR
1.6	Gender Risks	4. Submit results of employee surveys reflecting gender related concerns	4. Survey reports	4. As part of the ESCR
PS 2: Labor and Working Conditions				
2.1	Human Resource Policies and Procedures	1. Update Employee and Faculty Handbooks to include i) reference to collective bargaining and the right to freedom of association; and ii) grievance procedures with a thorough description of different grievance categories and assessment procedures, timing of responses beyond formal reports, anonymity, anti-reprisals policy nor dissemination mechanisms	1. Updated Employee and Faculty Handbooks	1. 6 months after 1 st disbursement
		2. Update the Health and Safety Policy (HSP) and the Employee, Student and Faculty (ESF) Handbooks to include provisions against the use of child and forced labor.	2. Updated HSP and ESF handbooks	2. 6 months after 1 st disbursement
2.2	Occupational Health and Safety	1. Submit Exposure to Infectious and Environmental Hazards Policy	1. Exposure to Infectious and Environmental Hazards Policy	1. Prior to 1 st disbursement
		2. Submit Laboratory Safety Policy	2. Laboratory Safety Policy	2. Prior to 1 st disbursement
		3. Submit Laboratory Safety Rules and Guidelines	3. Laboratory Safety Rules and Guidelines	3. Prior to 1 st disbursement
		4. Submit annual risk assessments	4. Annual risk assessments	4. As part of the ESCR
2.3	Provisions for people with disabilities	1. Conduct an assessment on the existing building design to enable retrofit to accommodate universal design	1. Retrofit assessment report	1. 6 months after 1 st disbursement
		2. Implement recommendations from assessment	2. Evidence of implementation	2. 1 year after 1 st disbursement, and thereafter as part of the ESCR
		3. Submit a representation stating that the Project includes features for Universal Access	3. Representation supporting Universal Access	3. Prior to 1 st disbursement
		4. Conduct training for Aides for Persons with Disabilities (APDs)	4. Evidence of APD training	4. 6 months after 1 st disbursement, and thereafter as part of the ESCR
2.4	Workers Engaged by Third Parties	5. Prepare contractual clauses for the Project to ensure that contractors and sub-contractors are bound to Employee Handbook, and Anti-Discrimination, and Diversity and Equality policies.	5. Copies of the contract model.	5. Prior to start of construction activities
2.5	Supply Chain	1. Updated Vendor Evaluation Form (VEF) to include specific guidelines on scoring regarding provisions against child and forced labor, along with sustainable practices	1. Updated VEF	1. Prior to 1 st disbursement
		2. Update procurement procedures and policies to ensure that no child or forced labor is used along supply chain	2. Updated Procurement Policy	2. 3 months after 1 st disbursement
		3. Communicate revised procedure and policy to third parties (contractors and sub-contractors)	3. Evidence of communication to third parties	3. 3 months after 1 st disbursement
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Resource Efficiency	1. Include in final Project design green building sustainability features (including renewable energy options)	1. Report on the final Project design	1. Prior to 1 st disbursement
		2. Submit Sustainability Strategy (2021-2025)	2. Sustainability Strategy (2021-2025)	2. Prior to 1 st disbursement
		3. Provide status report on sewage treatment plant as part of Project design	3. Status report or final project design with sewage treatment plant	3. Prior to 1 st disbursement

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		4. Provide a progress report on Edge Certification	4. Progress report	4. 3 months after 1 st disbursement
		5. Submit annual Sustainability Report	5. Annual Sustainability Report	5. As part of ESCR
		6. Conduct annual energy audits	6. Energy audit reports	6. 6 months after disbursement for existing operations; and thereafter as part of ESCR for new and existing operations
		7. Implement recommendations from energy audits	7. Evidence of implementation of measures	7. Annually as part of ESCR
3.2	Water consumption	1. Include in the final Project design water saving and harvesting mechanisms	1. Report on the final Project design	1. Prior to 1 st disbursement
		2. Conduct annual water consumption audit	2. Water consumption audit report	2. 6 months after disbursement for existing operations; and thereafter as part of ESCR for new and existing operations
		3. Implement recommendations from water consumption audits	3. Evidence of implementation of measures	3. Annually as part of ESCR
4.	Waste Management (including hazardous waste)	1. Provide status report on sewage treatment plant as part of Project design	1. Status report or final project design with sewage treatment plant	1. Prior to 1 st disbursement
		2. Develop an Operational Waste Management Plan ("OWMP") for all waste streams not limited to solid, liquid, and hazardous waste including a commitment to not purchase, store, use, or trade in products that fall in WHO Recommended Classification of Pesticides.	2. Operational WMP	2. 6 months after 1 st disbursement
		3. Implement the Operational WMP	3. Evidence of implementation	3. As part of the ESCR
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
		2. Update the Emergency Action Plan (EAC) to capture and categorize a response to other general communicable disease outside of Covid-19, including sexually transmitted diseases ("STD")	2. Updated EAC	2. 6 months after 1 st disbursement
		3. Provide training on revised EAC and general health and safety	3. Training programs and reports	3. Annually as part of ESCR
		4. Based on the security assessment, submit a Security Plan for the Project	4. Security Plan	4. 6 months after 1 st disbursement
4.2	Infrastructure and Equipment Design and Safety	1. Conduct assessment to enhance the FSS for the existing University building	1. FSS Assessment Report	1. 6 months after 1 st disbursement
		2. Implement recommendations from FSS assessment report	2. Evidence of implementation	2. 1 year after 1 st disbursement, and thereafter as part of ESCR
		3. Develop plan to enclose the perimeter for the University's diesel generator	3. Plan report	3. 6 months after 1 st disbursement
		4. Implement plan recommendations	4. Evidence of implementation	4. 1 year after 1 st disbursement
		5. Update the Fire Safety Plan (FSP) to reflect maintenance and monitoring of FSS, specific schedule and outline on training and practice (i.e., simulations and drills), and equipment requirements for employees responsible for any response operations	5. Updated FSP	5. 6 months after 1 st disbursement
		6. Submit report on final L&FS and layout design the Project including i) adequate Fire Safety Systems (FSS) that include but is not limited to hoses, smoke detectors, fire exits, alarm pull stations and extinguishers; and ii) drainage and ventilation features to manage flood risk and alleviate excess heat respectively	6. Report on the Final Project design	6. Prior to 1 st disbursement

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		7. Implement the FSS for Project	7. Evidence of FSS implementation	7. Upon completion of construction for both sites, and thereafter as part of the ESCR.
		8. 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.	8. Report on fire systems tests	8. As part of the ESCR
		9. Conduct safety training and drills	9. Training and drill reports	9. As part of the ESCR
4.3	Security Personnel	1. Submit a security risk assessment for the Project to identify internal and external security risks, and how these will be managed	1. Security Risk Assessment	1. 3 months after 1 st disbursement