

**FINAL ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP)**  
**BBOXX - Kenya, Rwanda, and DRC**  
**May 2020**

**Environmental and Social Action Plan (ESAP)**

No.	Action	Deliverable	Deadline
<b>Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts</b>			
1.	Finalize management plans under the corporate ESMS, in line with the requirements of Performance Standard 1. The ESMS will incorporate the following elements: (i) policy; (ii) identification of risks and impacts; (iii) management programs; (iv) organizational capacity and competency; (v) technical and soft skills training; (vi) emergency preparedness and response (include on-route emergency preparation and response (EPR) procedures for LPG distribution phase and on-route EPR drills; and set minimum EPR drill qualifications for contractor's cylinder truck drivers as part of the transportation management plan); (vii) stakeholder engagement; and (viii) monitoring and review	Submit the ESMS	Within 1 (one) month from the Effective Date, and, in any case, prior to commencement of the Project Enterprise's LPG-related operations
2.	Update environmental social health and safety (ESHS) policy indicating the ESMS comprising of operational procedures and other related documentation per the Performance Standards	Submit the updated policy	Within 1 (one) month from the Effective Date
3.	Develop occupational health and safety (OHS) policy and procedures and environmental and social risk management clauses for third party contractors (including applicable subcontractors and suppliers) to comply with the Performance Standards	Submit the OHS procedures	Within 1 (one) month from the Effective Date
4.	Environmental and social risk management plan for LPG operations	Submit the environmental and	Prior to commencement of the Project Enterprise's LPG-related operations

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		social risk management plan for LPG operations	
5.	Appoint an environmental, health, and safety (EHS) manager at the corporate level Appoint EHS officers in the Project Enterprise to oversee the implementation of the ESMS and related environmental and social procedures	Submit the name and contact details of the EHS manager and EHS officers in the Project Enterprise	Within 6 (six) months from the Effective Date
6.	Incorporate the good international industry practices (GIIP), including applicable parts of the European Agreement of 30 September 1957 concerning the International Carriage of Dangerous Goods by Road (ADR) into the LPG traffic management plan	Submit the traffic management plan	Within 1 (one) month from the Effective Date
7.	Update and disclose (as applicable) and implement the grievance redress mechanisms for (a) workers, and (b) end-users (affected communities) to ensure alignment with the Performance Standard 2 and Performance Standard 4 respectively	Submit the grievance redress mechanisms	Within 2 (two) months from the Effective Date
8.	Develop and implement a corporate stakeholder engagement plan (SEP) consistent with the Performance Standard 1 requirements and implement at the Project Enterprise level	Submit the SEP	Within 2 (two) months from the Effective Date
<b>Performance Standard 2: Labor and Working Conditions</b>			
9.	Formalize the corporate OHS (i.e., accident and incident reporting and investigation procedure and provide forms / registry of recording of accident and incidents with root cause analysis process) and adopt	Submit the accident and incident reporting investigation	Within 6 (six) months from the Effective Date

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	at the Project Enterprise level as applicable to staff and contractors	procedures for personnel	
10.	Include EHS provisions in contracts with the sub-contractors providing services to the Project Enterprise’s operations	Submit the contracts with the sub-contractors including EHS provisions	Within 3 (three) months from the Effective Date
11.	Develop a corporate formal supply chain audit procedure	Submit the supply chain audit procedure	Within 6 (six) months from the Effective Date
12.	Update the human resources (HR) policy and procedures with statements on recognition of employee’s rights to join a lawful industry specific organization of their own choosing and commit to comply with laws of the Host Country pertaining to freedom of association and collective bargaining	Submit the updated HR policies and procedures manual including the update	Within 2 (two) months from the Effective Date
13.	Update the HR policies and procedure manual with a documented process to report sexual harassment and gender-based violence	Submit the updated HR policies and procedures manual including the update	Within 1 (one) month from the Effective Date
14.	Develop a worker and contractor’s code of conduct and disciplinary procedures including the prohibition to engage in any type of sexual harassment, sexual exploitation or abuse, and any type of gender-based violence	Submit the worker and contractor’s code of conduct	Within 3 (three) months from the Effective Date
<b>Performance Standard 3: Resource Efficiency and Pollution Prevention</b>			
15.	Develop a waste management plan which will include end-of-life management of solar panels and LPG cylinders consistent with the Performance Standards and applicable World Bank Group (WBG) EHS Guidelines (i.e., Environmental, Health and	Submit the waste management plan	Within 6 (six) months from the Effective Date

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	Safety (WBG EHS) General Guidelines (2007), Environmental, Health, and Safety (WBG EHS) Guidelines for Retail Petroleum Networks (2007))		
16.	Develop a comprehensive hazardous material procedure that clearly explains the process of managing hazardous materials and waste including but not limited to: disposal and storage of used oil, used oil filters, old batteries, broken solar panels, material safety data sheets, secondary containment during storage, labeling, and local emergency intervention measures (spill kits, etc.)	Submit the hazardous material procedure and evidence of implementation (i.e., photos, documents).	Within 3 (three) months from the Effective Date
<b>Performance Standard 4: Community Health, Safety and Security</b>			
17.	Develop and implement a community health and safety plan	Submit the community health and safety plan	Within 3 (three) months from the Effective Date
18.	Develop and implement safe driver and transport safety vehicle procedures, including training sessions for its own and third-party contractors during distribution for LPG operations (to be developed as part of the traffic management plan)	Submit the safe driver and transport safety procedures	Within 2 (two) months from the Effective Date
19.	Develop a security policy to ensure that security is provided in a manner that does not jeopardize the community's safety or the security provider relationship with the community and that is consistent with the requirements under the laws of the Host Country and Performance Standard 4	Submit the security policy	Within 3 (three) months from the Effective Date