

Annex 1: Environmental and Social Action Plan (ESAP)
Diamniadio VRD Urban Pole
June 2021

Number	Action	Deliverable	Target Date
Performance Standard 1 Assessment and Management of Environmental and Social Risks and Impacts			
1	The General Delegation for the Promotion of Urban Poles (The DGPU) will develop an integrated Environmental and Social (E&S) Policy that applies to all its units, while incorporating commitments to: (i) national E&S laws; and (ii) contractual obligations related to E&S risks and management of if its operations, in line with the Performance Standards (PSs).	E&S Policy	Within 1 (one) month from the Contract of Guarantee Effective Date
2	The DGPU will ensure that ECOTRA's senior management develops and signs an overarching policy defining the environmental and social objectives and principles that guide the Project to achieve sound environmental and social performance.	ECOTRA's E&S Policy	Within 1 (one) month from the Contract of Guarantee Effective Date
3	The DGPU will ensure that ECOTRA strengthens its Environmental and Social Management System (ESMS) by developing a comprehensive ESMS that identifies the E&S risks of the entire Project and develops associated management programs in line with PS1 and include: a. The risks and impacts omitted in the E&S Impact Assessment (ESIA) such as (a) ECOTRA's second site approximately (1 km away from the base camp) where the concrete batching plant has been moved to; (b) impacts related to wastewater generated by	ECOTRA's ESMS	Within 1 (one) month from the Contract of Guarantee Effective Date

Annex 1: Environmental and Social Action Plan (ESAP)
Diamniadio VRD Urban Pole
June 2021

construction sites (e.g., washing water, concrete slurry, runoff water); (c) impacts linked to the gaseous releases of equipment (e.g., construction machinery, generators, trucks, etc.); (d) potential risk of accidents related to machinery/equipment (concrete plant, generator and concrete mixer); (e) risk of cave-in linked to excavations and trenches; (f) risk of accidents related to maintenance activities; (g) risks of accidents linked to the mining of the laterite quarry;

b. Prepare a Framework ESMS document setting out the scope of the ESMS, underlying principles of the ESMS – including legal commitments and international standards, core elements and structure of the ESMS (including policies, plans, procedures), the organizational chart, roles and responsibilities, training, monitoring, and reporting. The ESMS Framework should address all E&S aspects, including those related to HR, OHS, emergency preparedness and response, stakeholder engagement, and grievance mechanisms.

c. An updated EPRP to include: (a) a comprehensive risk analysis; (b) evaluation of emergency scenarios for which procedures have been developed; (c) establishment of an internal emergency response team and delineation of roles and responsibilities; (d) identification of external entities that must intervene in the event of an emergency; (e)

Annex 1: Environmental and Social Action Plan (ESAP)
Diamniadio VRD Urban Pole
June 2021

establish regular schedule for inspection and maintenance of firefighting equipment and (f) establishment of an emergency evacuation plan;

d. A template for monitoring and reporting on EHS performance to relevant stakeholders. ECOTRA's reporting framework should be developed in consultation with DEEC and include ECOTRA's greenhouse gas footprint;

e. A SEP based on the requirements of MIGA's PS1 incorporating the grievance mechanism and providing regular information to farmers on their works and potential impacts to lake(s) or farming activities. Furthermore, ECOTRA will schedule regular awareness sessions with communities that will be impacted by the quarry operation to update them on project activities, associated risks and impacts, and mitigation measures;

f. Legally establish health and safety committee to meet requirements;

g. A written procedure for the management and storage of hazardous materials; and for transferring diesel fuel from delivery vehicles to underground storage tanks;

h. A procedure to manage the piles of spoils prior to the rainy season; and

i. Mitigation measures to address impacts to community health and safety, this includes developing and implementing safe driver and transport safety vehicle procedures, including training sessions for its own and third-party

**Annex 1: Environmental and Social Action Plan (ESAP)
Diamniadio VRD Urban Pole
June 2021**

	haulage contractors during construction - to be developed as part of the traffic management plan.		
4	The DGPU will ensure that ECOTRA respects the conditions of the protocol which includes an ESIA to be undertaken for the quarry and the development of quarry rehabilitation plan.	a) Terms of Reference of the ESIA b) ESIA; and c) quarry rehabilitation plan	a) Within 1 (one) month from the Contract of Guarantee Effective Date b) Within 3 (three) months from the Contract of Guarantee Effective Date c) No later than March, 2021
5	The DGPU will address cumulative impacts by undertaking the following activities: a. implementation of the environmental and social management framework developed as part of the Strategic Environmental and Social Assessment (SESA) of the “Pôle Urbain de Diamniadio” (PUD); b. implementation of mitigation measures and management of the impacts generated by the activities of each actor in the context of its ESMP; c. collaboration of different actors around concerted intervention activities within the PUD; and d. implementation of an environmental and social monitoring program to assess cumulative impacts over time of the projects in the PUD.	ESMS and report on monitoring and management of the cumulative impacts generated by different actors in form and substance satisfactory to MIGA	Within 4 (four) months from the Contract of Guarantee Effective Date
6	The DGPU will develop an ESMS in line with national law and the PSs using as the starting point the ESMP	a. Procedures for application of Green Guide	a. Within 1 (one) month from the Contract

**Annex 1: Environmental and Social Action Plan (ESAP)
Diamniadio VRD Urban Pole
June 2021**

included in the draft Strategic Environmental and Social Assessment (SESA) and strengthening it by adding the elements below to align fully with applicable Performance Standards. The DGPU will:

- a. put in place procedures to implement its Green Guide to ensure that the various actors in the PUD adhere to the standard of environmental protection outline in the Guide;
- b. develop and implement a traffic management within the DGPU with speed limit signage;
- c. develop and implement an Emergency Preparedness and Response Plan (EPRP) for the PUD (i.e. procedures in the event of a fire, spill of dangerous products, and act of terrorism) that includes emergency procedures and roles and responsibilities. It should be developed in cooperation with key stakeholders such as the local fire department and police, and ECOTRA. The EPRP will also be tested through simulations that include key stakeholders;
- d. install fire hydrants in the PUD as part of its emergency preparedness and response;
- e. develop and implement a stakeholder engagement plan (SEP) including a grievance mechanism in line with PS1. Furthermore, the DGPU will as part as of its SEP, provide farmers and other stakeholders with ongoing information on issues of

- b. ERP and SEP in form and substance satisfactory to MIGA
- c. ESMS in form and substance satisfactory to MIGA

of Guarantee Effective Date

- b. Within 2 (two) months from the Contract of Guarantee Effective date
- c. Within 4 (four) months from the Contract of Guarantee Effective Date

**Annex 1: Environmental and Social Action Plan (ESAP)
Diamniadio VRD Urban Pole
June 2021**

	<p>concern to them and of the Project. The grievance mechanism will be communicated to stakeholders and its functioning explained;</p> <p>f. incorporate in its ESMS procedures to address the risk and impacts indicated in the SESA Environmental and Social Management Plan;</p> <p>g. monitor and report on dust control measures such as regularly watering runways and traffic lanes (at least twice a day), limiting traffic speeds and ensuring truck tarpaulins are sealed;</p> <p>h. develop a waste management plan to include hazardous and non-hazardous waste management in accordance with PS3; and</p> <p>i. develop and implement procedures to monitor the management of hazardous waste by the companies operating within the PUD.</p> <p>Furthermore, the DGPU will increase collaboration among its units and with their regional and national counterparts to positively contribute to a seamless execution of the DGPU sustainable development goals and specifically improve the implementation of its ESMS.</p>		
7	<p>The DGPU's Urban Planning and Land Development unit DGPU will be required to strengthen its E&S team with at least:</p> <p>a. an Environmental Health and Safety (EHS) specialist;</p>	<p>a. Terms of Reference for all three positions</p> <p>b. CV and Contract of EHS and Social Specialists</p> <p>c. Reference of and contract with independent</p>	<p>a. Within 1 (one) month from the Contract of Guarantee Effective Date</p> <p>b. Within 2 (two) months from the</p>

**Annex 1: Environmental and Social Action Plan (ESAP)
Diamniadio VRD Urban Pole
June 2021**

	<p>b. a Social Development Specialist to oversee Project-related land acquisition, stakeholder engagement, grievance management, and livelihood restoration (ESAP action item 8); and</p> <p>c. an independent engineering and consulting firm to support the DGPU in environmental monitoring. This firm will work closely with the Coordination unit and <i>Department de l'Environnement et des Établissements Classés</i> (DEEC) to ensure coordination on monitoring as well as support the DGPU in MIGA's annual E&S performance reporting requirements.</p>	<p>engineering and consulting firm</p>	<p>Contract of Guarantee Effective Date</p>
8	<p>The DGPU's Urban Planning and Land Development unit will undertake training on international best practice on ESMS per guidance provided in Assessment and Management of Environmental and Social Risks and Impacts (PS1) and particularly Land Acquisition and Involuntary Resettlement (PS5) in line with MIGA's PS5.</p>	<p>Training materials in form and substance satisfactory to MIGA</p>	<p>Within 1 (one) month from the Contract of Guarantee Effective Date</p>
<p>Performance Standard 2 Labor and Working Conditions</p>			
9	<p>In order to align with Performance Standard requirement, the DGPU will elaborate a written HR policy and update its Staff Rules to integrate:</p> <ul style="list-style-type: none"> a. freedom of association; b. specific policy that addresses harassment, intimidation especially regarding women; c. and grievance mechanism. 	<p>HR Policy and Staff Rules in a form and substance satisfactory to MIGA</p>	<p>Within 1 (one) month from the Contract of Guarantee Effective Date</p>

**Annex 1: Environmental and Social Action Plan (ESAP)
Diamniadio VRD Urban Pole
June 2021**

	<p>d. a statement that whenever temporary or existing housing / hotel accommodation is provided to the Project workers by the Project, this accommodation will meet IFC & IBRD Guidance Note on Workers' Accommodation: Processes and Standards.</p>		
10	<p>The DGPU will ensure that: (a) the Recruitment policy is signed by ECOTRA's senior management; and (b) the Staff Rules which also indicates EHS measures to be observed on the site is strengthened to align with the requirement of this PS. These will include:</p> <ul style="list-style-type: none"> a. freedom of association b. specific policy that addresses harassment, intimidation especially regarding women; and c. a review of its grievances mechanism to align with PS1 including providing options for anonymous reporting. 	<p>ECOTRA's Recruitment policy, Staff Rules or updated grievance mechanism in form and substance satisfactory to MIGA</p>	<p>Within 1 (one) month from the Contract of Guarantee Effective Date.</p>
11	<p>The DGPU will ensure that ECOTRA:</p> <ul style="list-style-type: none"> a. carries out a comprehensive review of its HR policies and practices for hiring day laborers to ensure compliance with all legally required practices, including regulations on working hours and provision of pay slips. b. During the construction and operations phases ensure that they implement the HR Policy in line with the requirements of PS2 for all types of workers, including direct and sub-contract workers. 	<p>ECOTRA's updated HR procedures and Staff Rules in form and substance satisfactory to MIGA Copy of awareness raising campaign</p>	<p>Within 2 (two) months from the Contract of Guarantee Effective Date</p>

**Annex 1: Environmental and Social Action Plan (ESAP)
Diamniadio VRD Urban Pole
June 2021**

	<p>c. include awareness raising of its employees on HIV/Aids/ and sexually transmitted disease and sexual harassment.</p> <p>d. third parties meet applicable Project's E&S, national labor law and PS2 requirements.</p>		
12	<p>a. The DGPU will ensure that ECOTRA integrates in contracts with security guards and subcontractors a requirement that no minors are allowed to access the site.</p> <p>b. The DGPU will ensure that ECOTRA strengthens its vigilance and raise awareness with its security guards and subcontractors with regards to minors accessing the site.</p>	<p>a. Clause in contracts with security guards and subcontractors</p> <p>b. Date of awareness raising campaign, picture of signs at gate entrance</p>	<p>a. By the Contract of Guarantee Effective Date for existing contracts and at the point of signing future contracts</p> <p>b. Within 2 (two) months from the Contract of Guarantee Effective Date</p>
13	<p>The DGPU will ensure that ECOTRA strengthens the protection of its workers by taking life and fire safety measures such as: undertake staff training on first aid, rescue and evacuation drills; designate fire wardens; designate muster points; establish clear roles and responsibilities.</p>	<p>update and training pictures on all the required measures</p>	<p>Within 1 (one) month from the Contract of Guarantee Effective Date</p>
14	<p>The DGPU will ensure that ECOTRA provides suitable personal protective equipment (PPE) for all workers for works to be undertaken; and renew PPE as needed and enforce use.</p>	<p>Report from Monitoring Consultant firm or DEEC confirming improvement</p>	<p>Within 1 (two) month from the Contract of Guarantee Effective Date</p>

Performance Standard 3 Resource Efficiency and Pollution Prevention

**Annex 1: Environmental and Social Action Plan (ESAP)
Diamniadio VRD Urban Pole
June 2021**

15	The DGPU will commission ECOTRA to consider options to reuse excess water caused by flooding overflowing the existing lakes. These options should take into consideration potential impacts to the biodiversity values of the neighboring La Petite Cote KBA that may be identified through action item #26.	Submit the design plan	Within 5 (five) months from the Contract of Guarantee Effective Date
16	The DGPU will ensure that ECOTRA: a. assesses the effectiveness of wastewater drainage to the recovery pit to prevent retention of stagnant water; b. identify waste streams (i.e. solid and liquid) including construction site wastewater such as runoff and concrete wash water; and c. incorporate procedures to manage these waste streams into its ESMS.	ECOTRA's wastewater management plan	Within 2 (two) months from the Contract of Guarantee Effective Date
17	The DGPU will ensure that ECOTRA installs secondary containments for above ground tanks as well as a storage area for used oils.	Photographic evidence	Within 2 (two) months from the Contract of Guarantee Effective Date
Performance Standard 4 Community Health and Safety			
18	The DGPU will ensure that ECOTRA periodically organize effective awareness sessions with communities likely to be impacted by informing them of Project activities. The sessions will include potential E&S risks and impacts from the quarry and the mitigation measures to be implemented.	Transport safety procedures developed, and training implemented	Within 3 (three) months from the Contract of Guarantee Effective Date
19	The DGPU will ensure that ECOTRA develops a hazardous material management plan within and outside the fence to ensure that it avoids or minimize the	ECOTRA ESMS or specific procedures addressing transport of	Within 2 (two) months from the Contract of Guarantee Effective Date

**Annex 1: Environmental and Social Action Plan (ESAP)
Diamniadio VRD Urban Pole
June 2021**

	potential for community exposure to hazardous material particularly during transport. Furthermore, DGPU will ensure that ECOTRA will exercise commercially reasonable efforts to control the safety of deliveries of hazardous materials, and of transportation and disposal of hazardous wastes.	hazardous waste in form and substance satisfactory to MIGA. Copy of contract with hazardous waste transport company	
20	The DGPU will ensure that ECOTRA through its ESMS avoid or minimize the potential for community exposure to COVID-19 from its workers' interactions with communities. ECOTRA will continue to raise awareness amongst all its workers and ensure that they are: <ul style="list-style-type: none"> a. provided with masks to use on their way to and from work; and b. that they are continuously informed on protection measures against COVID-19. 	Copy of updated procedures on COVID-19	Within 1 (one) month from the Contract of Guarantee Effective Date
21	The DGPU will ensure that ECOTRA, prior to hiring security personnel, has procedures in place to make reasonable inquiries to investigate employment statements and other available information, including criminal records, of individuals or firms. ECOTRA shall commit to not employ or use individuals or companies that have a history of abuse or violation of human rights.	Training materials and number of security agents trained. Procedure for screening and hiring security agents	Within 2 (two) months from the Contract of Guarantee Effective Date
Performance Standard 5 Land Acquisition and Involuntary Resettlement			
22	The DGPU will be required to: <ul style="list-style-type: none"> a. meet all GoS requirements as well as the standards of its international lenders; and b. develop a land acquisition framework/procedure in accordance with 	Land Acquisition Procedure in form and substance satisfactory to MIGA	Within 2 (two) months from the Contract of Guarantee Effective Date

**Annex 1: Environmental and Social Action Plan (ESAP)
Diamniadio VRD Urban Pole
June 2021**

	<p>national requirements and PS5 to (b) will put in place a land acquisition procedure that will ensure that future land obtained for the Project will meet the PS5 requirements.</p> <p>c. The procedure should provide for public disclosure of PAPs' identification, asset valuing methods, compensation rates and schedule and appeal processes, so that future PAPs understand the compensation process and know what to expect at the various stages of the transaction. The Procedure will also include a transparent process for consultation and compensation (or where necessary, livelihood restoration).</p>		
23	The DGPU will need to prepare a vulnerability assessment and action plan based on a review of the PAPs ability to restore their livelihoods. The gardeners will also be included in the vulnerability assessment.	Vulnerability assessment in form and substance satisfactory to MIGA	Within 2 (two) months from the Contract of Guarantee Effective Date
24	The DGPU will: <ul style="list-style-type: none"> a. revise the Community Development Plan as needed to address any findings by the vulnerability assessment of former land users in the Project site who were unable to restore their livelihoods; and b. ensure that the action plan is implemented according to the schedule throughout the project to restore PAPs' livelihoods 	Vulnerability assessment and action plan in form and substance satisfactory to MIGA Implementation of the livelihood restoration action plan.	Within 4 (four) months from the Contract of Guarantee Effective Date Ongoing

Annex 1: Environmental and Social Action Plan (ESAP)
Diamniadio VRD Urban Pole
June 2021

25	The DGPU will ensure that herders have adequate access to water within the larger area and will consider granting access to seasonal ponds designed to hold run-off water from the site.	Provide update and pictures demonstrating access	Within 6 (six) months from the Contract of Guarantee Effective Date
Performance Standard 6 Biodiversity and Conservation of Living Natural Resources			
26	The DGPU will ensure that ECOTRA carries out a baseline hydrological study of the waterway(s) draining the project site through La Petite Cote KBA, prior to any further modification of the existing lake(s) within the PUD. Should the study show the potential for significant alteration of the hydrological regime, ECOTRA will consult with the appropriate authorities and any relevant NGOs about potential impacts on the biodiversity values of the KBA and incorporate into the ESMS water management measures to minimize or eliminate those impacts.	Provide a hydrological report. Provide the documented outcomes of consultations, if necessary and the management measures to address any impacts.	Within 3 months of the end of the 2021 rainy season.