

**Environmental & Social Action Plan for the Kamuzu University of Health Sciences Lilongwe Campus (KUHeS LL); #15734 (November 2021)**

No.	Performance Standards	Due Dates	Deliverable
<b>PS1: Assessment and Management of Social and Environmental Risks and Issues</b>			
1.	The Project Enterprise (PE) and Engineering, Procurement and Construction Contractor (EPC) will develop the Project specific Environmental and Social Management System (ESMS) for construction and operations that conforms with Malawian laws and in line with MIGA PSs as well as applicable WBG Environmental Health and Safety (EHS) guidelines. The ESMS will include the following items: (i) E&S Policy; (ii) Health and Safety (H&S) Policy (health safety and environmental monitoring and reporting); (iii) definition of organizational capacity, responsibilities and competence; and (iv) E&S management programs and plans (such as emergency preparedness and response mechanisms, management of hazardous and non-hazardous waste, and stakeholder engagement).	Within 2 months of the Effective Date.	Submit to MIGA the Investment Project ESMS system document and evidence of implementation (e.g., procedures, checklists, aspects / impacts register).
2.	The PE will develop Project Gender Based Violence and Harassment (GBVH) Risk Management Plan that conforms with Malawian laws and is aligned with MIGA’s PSs 1, 2, and 4. The GBVH Risk Management Plan will include the GBVH Policy and disseminated to all students residing in the hostels and to the staff who will be working in the hostels especially security personnel. a) GBVH Risk Management Plan. b) GBVH Policy	Prior to MIGA Contract of Guarantee (CoG) signing.	Submit to MIGA a) GBVH Risk Management Plan. b) GBVH Policy
3.	The PEs will include specific OHS requirements and E&S risk management clauses in the EPC and O&M contractor contracts to be in line with MIGA’s PS requirements. These clauses will include guidance on managing Project E&S risks such as on Occupational Health and safety, hazardous materials and hazardous waste management, pollution prevention, working conditions and workers safety, Gender Based Violence and Harassment (GBVH) and community safety.	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA the EPC and O&M contractor’s contract for MIGA’s review and approval

4.	The PE and EPC and O&M contractor will develop the EHS Policy as part of the ESMS update to include management of social risks to guide the project to achieve sound environmental and social performance in line with MIGA PS 1.	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA the PE and EPC and O&M contractor's HSE policies document
5.	PE will develop and implement a Sexual Harassment Policy (SHP) for construction and Operation phases in line with national laws and MIGA PS 1. The SHP will clearly define the roles and responsibilities of the PE, EPC, O&M, students, workers and community members.	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA SHP
6.	The PE will be required obtain the environmental ESIA certificate and operational permits for all the 3 developments and establish measures to implement and comply with the permit's requirements in line with the Malawi national laws and MIGA's E&S requirements.	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA copies of environmental and operational permits
7.	PE will require the EPC Contractor to update the Project ESMPs for construction and the O&M Contractor will develop ESMPs for operation and will include monitoring and reporting requirements in line with MIGA's PSs and WBG EHS guidelines	i) Within 1 months of the Effective Date. ii) 30 days prior to Project Operation	Submit to MIGA the i) Updated ESMP for construction ii) ESMPs for Operation ESMP
8.	PE will require that the EPC contractors to trains and ensure all workers and site management are aware of the Project management plans/procedures and their operational requirements.	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA Training materials and records
9.	PE and EPC contractors will be required to appoint a qualified EHS Manager to manage the 3 projects and any additional EHS officers if needed in line with the requirements of MIGA's PS1 during the Projects construction and operations phases.	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA the appointed HSE Manager and HSE officer's CVs
10.	The PE will ensure that all 3 development designs conform with relevant Malawi Bureau of Standards specifications and IFC/ US National Fire Protection Association (NFPA 101) guidelines	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA the 3 development designs with fire protection specifications.
11.	The PE will require the EPC and O&M contractor to develop a comprehensive Emergency Preparedness and Response Plan (EPRP) to address the facility wide risks including fire and other external emergencies for the Project construction and operation. The EPRP will articulate the steps needed to collaborate with nearby communities, local government agencies, and relevant third parties to facilitate response to emergency situations to prevent and mitigate harm to people and/or the environment. i) EPRP for construction phase ii) EPRP for O&M phase	i) Within 1 months of the Effective Date. ii) 30 days prior to Project Operation	Submit to MIGA:  i) EPRP for construction phase

			ii)EPRP for operation phase.
12.	PEs will require the EPC and O&M contractor to equip all sites with firefighting equipment including adequate fire extinguishers on sites that are regularly inspected and well maintained in line with the national law and with the requirements of MIGA' PS1.	Within 1 months of the Effective Date	Submit to MIGA photographic evidence of fire extinguishers equipped on Project sites.
13.	<p>a) PE will require the EPC Contractor to conduct monthly EHS inspections per contractual agreements and develop an EHS monitoring procedures and ensure that all the EHS monitoring reports are detailed and includes EHS risks, OHS statistics, and mitigation measures during the construction phase.</p> <p>b) For the Operations phase, the PE will require the O&amp;M contractor to conduct Project monitoring and EHS inspections</p>	<p>Within 1 months of the Effective Date</p> <p>Ongoing</p>	<p>Submit to MIGA:</p> <p>a)</p> <p>i) EHS inspections reports</p> <p>ii) EHS monitoring procedures</p> <p>b) Report as part of Annual Monitoring Report</p>
14.	The PE will hire an independent party GBVH monitoring consultant who will conduct Project GBVH risks assessments, monitoring and reporting during the Project construction and operation.	<p>a) Prior to MIGA Contract of Guarantee (CoG) signing</p> <p>b) Annual Monitoring Report Format agreed.</p>	<p>Submit to MIGA:</p> <p>a) GBVH third Party monitoring consultant CVs</p> <p>b) Annual GBVH Risk Assessment reports.</p>
15.	The PE will be required to develop a Stakeholder Engagement Plan (SEP) which covers its construction and operations phases.	Within 1 months of the Effective Date	Submit to MIGA SEP.
16.	<p>a) The PE, EPC and O&amp;M Contractor will develop a project specific Community Grievance and External Communication Mechanism that includes GBVH reporting mechanisms, in line with the requirements of MIGA PS 1 for the Project construction and operation phases.</p> <p>i. PE and EPC contractor</p> <p>ii. O&amp;M Contractor</p> <p>b) The PE with the support of OMM and Universities management will develop an integrated and effective external grievance mechanism for the Universities that includes GBVH reporting mechanisms, that is enforced, and implemented effectively throughout the project lifecycle in line with the requirements of MIGA's PS1 for the Project construction and operations phases.</p>	<p>a)</p> <p>i. Within 1 months of the Effective Date</p> <p>ii. 30 days prior to operations</p> <p>b) Within 1 months of the Effective Date</p>	<p>Submit to MIGA</p> <p>a)</p> <p>i) PE and EPC Community Grievance and External communication Mechanism.</p> <p>ii) O&amp;M Community Grievance and External communication Mechanism.</p> <p>b) University Community Grievance and External</p>

			communication Mechanism.
17.	The PE with the support of OMM, the College/University management, the Government of Malawi through the Ministry of Gender and development the Malawi Human Rights or other NGOs will identify and train university staff who will be responsible for investigating cases of GBVH that may be reported.	Within 1 months of the Effective Date	Submit to MIGA Training records, materials, and staff attendance registers.
<b>PS2: Labor and Working Conditions</b>			
18.	The PE, EPC and O&M contractor will develop Human Resources (HR) policy and procedures that are Project specific during construction and operation to ensure they are in line with MIGA's PS2 and Malawi laws. The EPC and O&M contractor will ensure that all direct and indirect employees are aware of its content. PE will also ensure that EPC and O&M contractor apply these to their sub-contractors.	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA the PE and EPC and O&M contractor's HR policy aligned with PS2 and evidence on its dissemination to contractors and employees
19.	The PE will also engage a technical expert to support the PE's Human Resources Manager and team to strengthen gender-related policies, write new policies and develop a communication and training plan for sensitization of these policies across the students, staff and entire workforce working in the three accommodation facilities during construction and operation phases.	Within 1 months of the Effective Date	Submit to MIGA the Consultants CVs who will support the HR team.
20.	The PE will develop Workers Code of Conduct (CoC) procedure for the Project construction and operation phase. The CoC will reflect respect for local beliefs and customs and with special attention for risks related to sexual harassment, sexual exploitation and abuse and gender-based violence harassment (GBVH) and ensure all existing Project personnel are trained on and have signed all gender-related policies, including awareness of the Code of Conduct, sexual harassment policy and the grievance redress mechanism for reporting allegations of sexual harassment in workplaces.	Prior to MIGA Contract of Guarantee (CoG) signing.	Submit to MIGA Workers Code of Conduct (CoC) Procedure.
21.	As Part of creating awareness on GBVH, the PE will require the EPC and O&M Contractors in the three projects to design and print posters of simplified versions of the workers Code of Conduct in (English and Chichewa) in the Project sites during construction and Students Code of Conduct in (English and Chichewa) in the students		Submit to MIGA photographic evidence of the posters at the

	<p>accommodation facilities once operational and ensure these are visibly displayed in multiple locations.</p> <p>a) Posters for workers Code of Conduct in (English and Chichewa) in the Project sites</p> <p>b) Posters for Students Code of Conduct in (English and Chichewa) in students accommodation facilities.</p>	<p>a) Within 1 months of the Effective Date</p> <p>b) 30 days prior to Operations</p>	<p>project sites and within student's accommodation facilities.</p>
22.	<p>The PE will develop and implement the grievance redress mechanism so all gender-related allegations, including sexual harassment, are referred to and investigated by an internal sexual harassment and abuse committee, comprising the HR Manager/representative, the Student unions and at least one workers' representative in line with the requirements of MIGA's PS1 for the Projects construction and operations phases</p>	<p>Prior to MIGA Contract of Guarantee (CoG) signing</p>	<p>Submit to MIGA the PE's GRM</p>
23.	<p>PE, EPC and O&amp;M contractor will update worker grievance mechanism and ensure it adequately captures how GBVH cases are received, screened, tracked, and responded to in line with MIGA PS2 requirements during the construction phases.</p> <p>a) EPC's updated workers grievance mechanism</p> <p>b) O&amp;M's workers grievance mechanism</p>	<p>a) Prior to MIGA Contract of Guarantee (CoG) signing</p> <p>b) 30 days prior to Operations.</p>	<p>Submit to MIGA the</p> <p>a) EPC's updated workers grievance mechanism</p> <p>b) O&amp;M's workers grievance mechanism</p>
24.	<p>The PE will ensure that EPC and O&amp;M contractor to develops and implements site-specific Occupational Health and Safety (OHS) procedures for the construction and operations phases detailing out the following issues: These procedures will cover the following issues: i) hazard identification and assessment; ii) construction site safety, iii) specific procedures for hazardous works, worker's safety and training iv) use of personal protective equipment; v) implement a worker's health program to screen the health of workers and measures to manage diseases (such as Malaria, Typhoid, Ebola and COVID-19); vi) site supervision and audit procedures; vii) incident investigations and reporting system and intervention measures (medical surveillance programs and first aid etc.).</p> <p>a) EPC's OHS procedure.</p> <p>b) O&amp;M OHS procedure.</p>	<p>a) Within 1 months of the Effective Date</p> <p>b) 30 days prior to operations</p>	<p>Submit to MIGA the EPC and O&amp;M contractor's OHS procedures and plan</p>
<b>PS3: Resource Efficiency and Pollution Prevention</b>			
25.	<p>The PE will require the EPC and O&amp;M contractor to develop water management plan which details options available for water sources, water use,</p>	<p>Within 1 months of the Effective Date</p>	<p>Submit to MIGA Water Management Plan</p>

	treatment requirements, water usage monitoring and estimated consumption during the construction and operations phase.		
26.	PE will be required to: <ul style="list-style-type: none"> <li>a. Obtain water abstraction permits/license from the regulatory authority.</li> <li>b. Conduct a water risks assessment and consider the water resource/groundwater availability, impacts on surrounding users and ecological flow in line with MIGA PS3</li> </ul>	<ul style="list-style-type: none"> <li>a. Prior to MIGA Contract of Guarantee (CoG) signing.</li> <li>b. Within 1 months of the Effective Date</li> </ul>	<ul style="list-style-type: none"> <li>a) Submit to MIGA water abstraction permits/license</li> <li>b) Water risks assessments study/report</li> </ul>
27.	The PE will require the EPC to develop a waste management plan for projects in line with MIGA' PS 3 requirements for construction and operations phase.	Within 1 months of the Effective Date	Submit to MIGA waste management plan.
<b>PS4: Community Health, Safety and Security</b>			
28.	PE will develop a Community Health and Safety Plan (including STI HIV/AIDS, cholera, and malaria prevention) to mitigate for community exposure to disease during construction and operations.	Within 1 months of the Effective Date	Submit to MIGA Community Health and Safety Plan.
29.	PE shall partner with the Ministry of Health and health-based NGOs to carry out a health care facilities quality assessment to determine the medical needs of the health facilities on the campuses to manage cases of GBVH which are reported. Based on the results of the quality assessment, identify opportunities, and develop measures to improve the services offered.	Within 1 months of the Effective Date	Submit to MIGA the health care facilities quality assessment report and improvement measures.
30.	The PE will collaborate with OMM, University, Ministry of Health, Ministry of Gender, Children Disability and Social Welfare to develop a Trauma center to support and provide counseling for GBVH survivors.	Within 1 months of the Effective Date	Submit to MIGA the establishment of the Trauma Center.
31.	The PE will require the EPC and O&M contractor to develop and implement the following plans and ensure to capture key elements of MIGA's PS4: <ul style="list-style-type: none"> <li>a) Security Risk Assessment; and</li> <li>b) Security Management Plan</li> </ul>	Within 1 months of the Effective Date	Submit to MIGA the following plans: <ul style="list-style-type: none"> <li>a) Security Risk Assessment and</li> <li>b) Security Management Plan</li> </ul>
32.	The PE will ensure that all Security officers: (i) sign the SHP and CoC; and (ii) are all trained on the GBVH and on CoC, so that they can assist in GBVH	Within 1 months of the Effective Date	Submit to MIGA Security Officer Training records material.

	cases identification, reporting, enforcement, and implementation of CoC.		
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## Environmental & Social Action Plan for Kamuzu University of Health Sciences Blantyre Campus (KUHeS Blantyre); #15734 (November 2021)

No.	Performance Standards	Due Dates	Deliverable
<b>PS1: Assessment and Management of Social and Environmental Risks and Issues</b>			
1.	The Project Enterprise (PE) and Engineering, Procurement and Construction Contractor (EPC) will develop the Project specific Environmental and Social Management System (ESMS) for construction and operations that conforms with Malawian laws and in line with MIGA PSs as well as applicable WBG Environmental Health and Safety (EHS) guidelines. The ESMS will include the following items: (i) E&S Policy; (ii) Health and Safety (H&S) Policy (health safety and environmental monitoring and reporting); (iii) definition of organizational capacity, responsibilities, and competence; and (iv) E&S management programs and plans (such as emergency preparedness and response mechanisms, management of hazardous and non-hazardous waste, and stakeholder engagement).	Within 2 months of the Effective Date.	Submit to MIGA the Investment Project ESMS system document and evidence of implementation (e.g., procedures, checklists, aspects / impacts register).
2.	The PE will develop Project Gender Based Violence and Harassment (GBVH) Risk Management Plan that conforms with Malawian laws and is aligned with MIGA's PSs 1, 2, and 4. The GBVH Risk Management Plan will include the GBVH Policy and be disseminated to all students residing in the hostels and to the staff who will be working in the hostels, especially security personnel.	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA a) GBVH Risk Management Plan. b) GBVH Policy
3.	The PEs will include specific OHS requirements and E&S risk management clauses in the EPC and O&M contractor contracts to be in line with MIGA's PS requirements. These clauses will include guidance on managing Project E&S risks such as on Occupational Health and safety, hazardous materials and hazardous waste management, pollution prevention, working conditions and workers safety, Gender Based Violence and Harassment (GBVH) and community safety.	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA the EPC and O&M contractor's contract for MIGA's review and approval
4.	The PE and EPC and O&M contractor will develop the EHS Policy as part of the ESMS update to include management of social risks to guide the project to achieve sound environmental and social performance in line with MIGA PS 1.	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA the PE and EPC and O&M contractor's HSE policies document



5.	PE will develop and implement a Sexual Harassment Policy (SHP) for construction and operation phases in line with national laws and MIGA PS 1. The SHP will clearly define the roles and responsibilities of the PE, EPC, O&M, students, workers and community members.	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA SHP
6.	The PE will be required obtain the environmental ESIA certificate and operational permits for all the 3 developments and establish measures to implement and comply with the permit's requirements in line with the Malawi national laws and MIGA's E&S requirements.	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA copies of environmental and operational permits
7.	PE will require the EPC and O&M Contractors to develop Project specific Project ESMPs for construction and operation phases to include monitoring and reporting requirements in line with MIGA's PS and WBG EHS guidelines.	i) Within 1 months of the Effective Date. ii) 30 days prior to Project Operation	Submit to MIGA the i) Updated ESMP for construction ii) ESMPs for Operation ESMP
8.	PE will require that the EPC contractors to trains and ensure all workers and site management are aware of the Project management plans/procedures and their operational requirements.	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA Training materials and records
9.	PE and EPC contractors will be required to appoint a qualified EHS Manager to manage the 3 projects and any additional EHS officers if needed in line with the requirements of MIGA's PS1 during the Projects construction and operations phases.	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA the appointed HSE Manager and HSE officer's CVs
10.	The PE will ensure that all 3 development designs conform with relevant Malawi Bureau of Standards specifications and IFC/ US National Fire Protection Association (NFPA 101) guidelines	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA the 3 development designs with fire protection specifications.
11.	The PE will require the EPC and O&M contractor to develop a comprehensive Emergency Preparedness and Response Plan (EPRP) to address the facility wide risks including fire and other external emergencies for the Project construction and operation. The EPRP will articulate the steps needed to collaborate with nearby communities, local government agencies, and relevant third parties to facilitate response to emergency situations to prevent and mitigate harm to people and/or the environment. i) EPRP for construction phase ii) EPRP for O&M phase	i) Within 1 months of the Effective Date. ii) 30 days prior to Project Operation	Submit to MIGA: i) EPRP for construction phase ii) EPRP for operation phase. phase.
12.	PEs will require the EPC and O&M contractor to equip all sites with firefighting equipment including adequate fire extinguishers on sites that are regularly inspected and well maintained in line	Within 1 months of the Effective Date	Submit to MIGA photographic evidence of fire extinguishers equipped on Project sites.

	with the national law and with the requirements of MIGA' PS1.		
13.	<p>a) PE will require the EPC Contractor to conduct monthly EHS inspections per contractual agreements and develop an EHS monitoring procedures and ensure that all the EHS monitoring reports are detailed and includes EHS risks, OHS statistics, and mitigation measures during the construction phase.</p> <p>b) For the Operations phase, the PE will require the O&amp;M contractor to conduct Project monitoring and EHS inspections</p>	<p>Within 1 months of the Effective Date</p> <p>Ongoing</p>	<p>Submit to MIGA:</p> <p>a)</p> <p>i) EHS inspections reports</p> <p>ii) EHS monitoring procedures</p> <p>iii) Report as part of Annual Monitoring Report</p>
14.	The PE will hire an independent party GBVH monitoring consultant who will conduct Project GBVH risks assessments, monitoring and reporting during the Project construction and operation.	<p>a) Prior to MIGA Contract of Guarantee (CoG) signing</p> <p>b) Annual Monitoring Report Format agreed.</p>	<p>Submit to MIGA:</p> <p>a) GBVH third Party monitoring consultant CVs</p> <p>b) Annual GBVH Risk Assessment reports.</p>
15.	The PE will be required to develop a Stakeholder Engagement Plan (SEP) which covers its construction and operations phases.	Within 1 months of the Effective Date	Submit to MIGA SEP.
16.	<p><b>a)</b> The PE, EPC and O&amp;M Contractor will develop a project specific Community Grievance and External Communication Mechanism that includes GBVH reporting mechanisms, in line with the requirements of MIGA PS 1 for the Project construction and operation phases.</p> <p><b>i.</b> PE and EPC contractor</p> <p><b>ii.</b> O&amp;M Contractor</p> <p><b>b)</b> The PE with the support of OMM and Universities management will develop an integrated and effective external grievance mechanism for the Universities that includes GBVH reporting mechanisms, that is enforced, and implemented effectively throughout the project lifecycle in line with the requirements of MIGA's PS1 for the Project construction and operations phases.</p>	<p>a)</p> <p><b>i.</b> Within 1 months of the Effective Date</p> <p><b>ii.</b> 30 days prior to operations</p> <p><b>b)</b> Within 1 months of the Effective Date</p>	<p>Submit to MIGA</p> <p><b>a)</b></p> <p><b>i)</b> PE and EPC Community Grievance and External communication Mechanism.</p> <p><b>ii)</b> O&amp;M Community Grievance and External communication Mechanism.</p> <p><b>b)</b> University Community Grievance and External communication Mechanism.</p>
17.	PE with the support of OMM, the College/University management, the Government of Malawi through the Ministry of Gender and Development, the Malawi Human Rights or other	Within 1 months of the Effective Date	Submit to MIGA Training records, materials, and staff attendance registers.

	NGOs will identify and train university staff who will be responsible for investigating cases of GBVH that may be reported		
<b>PS2: Labor and Working Conditions</b>			
18.	The PE, EPC and O&M contractor will develop Human Resources (HR) policy and procedures that are Project specific during construction and operation to ensure they are in line with MIGA's PS2 and Malawi laws. The EPC and O&M contractor will ensure that all direct and indirect employees are aware of its content. PE will also ensure that EPC and O&M contractor apply these to their sub-contractors.	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA the PE and EPC and O&M contractor's HR policy aligned with PS2 and evidence on its dissemination to contractors and employees
19.	The PE will also engage a technical expert to support the PE's Human Resources Manager and team to strengthen gender-related policies, write new policies and develop a communication and training plan for sensitization of these policies across the students, staff and entire workforce working in the three accommodation facilities during construction and operation phases.	Within 1 months of the Effective Date	Submit to MIGA the Consultants CVs who will support the HR team.
20.	The PE will develop Workers Code of Conduct (CoC) procedure for the Project construction and operation phase. The CoC will reflect respect for local beliefs and customs and with special attention for risks related to sexual harassment, sexual exploitation and abuse and gender-based violence harassment (GBVH) and ensure all existing Project personnel are trained on and have signed all gender-related policies, including awareness of the Code of Conduct, sexual harassment policy and the grievance redress mechanism for reporting allegations of sexual harassment in workplaces.	Prior to MIGA Contract of Guarantee (CoG) signing.	Submit to MIGA Workers Code of Conduct (CoC) Procedure.
21.	As part of creating awareness on GBVH, the PE will require the EPC and O&M Contractors in the three projects to design and print posters of simplified versions of the workers Code of Conduct in (English and Chichewa) in the Project sites during construction and Students Code of Conduct in (English and Chichewa) in the students accommodation facilities once operational and ensure these are visibly displayed in multiple locations. <ul style="list-style-type: none"> <li>a. Posters for workers Code of Conduct in (English and Chichewa) in the Project sites</li> <li>b) Posters for Students Code of Conduct in (English and Chichewa) in students accommodation facilities.</li> </ul>	<ul style="list-style-type: none"> <li>a. Within 1 months of the Effective Date</li> <li>b. 30 days prior to Operations</li> </ul>	Submit to MIGA photographic evidence of the posters at the project sites and within student's accommodation facilities.
22.	The PE will develop and implement the grievance redress mechanism so all gender-related allegations,	Prior to MIGA Contract of	Submit to MIGA the PE's GRM

	including sexual harassment, are referred to and investigated by an internal sexual harassment and abuse committee, comprising the HR Manager/representative, the Student Advisor and at least one workers' representative in line with the requirements of MIGA's PS1 for the Projects construction and operations phases	Guarantee (CoG) signing	
23.	PE and EPC and O&M contractor will develop worker grievance mechanism and ensure it adequately captures how GBVH cases are received, screened, tracked, and responded to in line with MIGA PS2 requirements during the construction phases. a) EPC's workers grievance mechanism b) O&M's workers grievance mechanism	a) Prior to MIGA Contract of Guarantee (CoG) signing  b) 30 days prior to Operations.	Submit to MIGA a) The EPC's workers grievance mechanism  b) The O&M's workers grievance mechanism
24.	The PE will require the EPC Contractors to establish policies and procedures for managing and monitoring the E&S performance of such third-party employees per MIGA's PSs, as well as incorporating these requirements in contractual agreements with third-party employees, as identified.	Within 1 months of the Effective Date	Submit to MIGA Third party employee policies and procedures
25.	The PE will ensure that EPC and O&M contractor to develops and implements site-specific Occupational Health and Safety (OHS) procedures for the construction and operations phases detailing out the following issues: These procedures will cover the following issues: i) hazard identification and assessment; ii) construction site safety, iii) specific procedures for hazardous works, worker's safety and training iv) use of personal protective equipment; v) implement a worker's health program to screen the health of workers and measures to manage diseases (such as Malaria, Typhoid, Ebola and COVID-19); vi) site supervision and audit procedures; vii) incident investigations and reporting system and intervention measures (medical surveillance programs and first aid etc.). a) EPC's OHS procedure. b) O&M OHS procedure.	a) Within 1 months of the Effective Date b) 30 days prior to operations Submit to	MIGA the EPC and O&M contractor's OHS procedures and plan
26.	PE will develop its policies and procedure to addresses the risks and impacts of COVID-19 to workers and communities in line with MIGA PS 1, 2 and 4.	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA updated policies and procedures
<b>PS3: Resource Efficiency and Pollution Prevention</b>			

27.	The PE will require the EPC and O&M contractor to develop water management plan which details options available for water sources, water use, treatment requirements, water usage monitoring and estimated consumption during the construction and operations phase.	Within 1 months of the Effective Date	Submit to MIGA Water Management Plan
28.	PE will be required to: i) Obtain water abstraction permits/license from the regulatory authority. ii) Conduct a water risks assessment and consider the water resource/groundwater availability, impacts on surrounding users and ecological flow in line with MIGA PS3	i. Prior to MIGA Contract of Guarantee (CoG) signing. ii. Within 2 months of the Effective Date	i) Submit to MIGA water abstraction permits/license ii) Water risks assessments study/report
29.	The PE will require the EPC to develop a waste management plan for projects in line with MIGA' PS 3 requirements for construction and operations phase.	Within 1 months of the Effective Date	Submit to MIGA waste management plan for construction and operations phase
30.	PE shall obtain a confirmation letter from the Blantyre City Water Board confirming there is available wastewater treatment capacity.	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA Confirmation Letter from Blantyre City Water Board.
<b>PS4: Community Health, Safety and Security</b>			
31.	PE will develop a Community Health and Safety Plan (including STI HIV/AIDS, cholera, and malaria prevention) to mitigate for community exposure to disease during construction and operations.	Within 1 months of the Effective Date	Submit to MIGA Community Health and Safety Plan.
32.	PE will require the EPC Contractor to develop Project Labor Influx Management Plan in line with MIGA PS 2 and 4	Within 1 months of the Effective Date	Submit to MIGA Labor Influx Management Plan.
33.	PE shall partner with the Ministry of Health and health-based NGOs to carry out a health care facilities quality assessment to determine the medical needs of the health facilities on the campuses to manage cases of GBVH which are reported. Based on the results of the quality assessment, identify opportunities, and develop measures to improve the services offered.	Within 2 months of the Effective Date	Submit to MIGA the health care facilities quality assessment report and improvement measures.
34.	The PE will collaborate with OMM, University, Ministry of Health, Ministry of Gender, Children Disability and Social Welfare to develop a Trauma	Within 1 months of the Effective Date	Submit to MIGA the establishment of the Trauma Center.

	center to support and provide counseling for GBVH survivors.		
35.	The PE will require the EPC and O&M contractor to develop and implement the following plans and ensure to capture key elements of MIGA’s PS4: a) Security Risk Assessment; and b) Security Management Plan	Within 1 months of the Effective Date	Submit to MIGA the following plans: a) Security Risk Assessment and b) Security Management Plan
36.	The PE will ensure that all the Security officers sign the SHP and CoC and they are all trained on GBVH and on the CoC so that they can assist in GBVH cases identification, reporting, enforcement, and implementation of CoC.	Within 1 months of the Effective Date	Submit to MIGA Security Officer Training records material
<b>PS5: Land Acquisition and Involuntary Resettlement</b>			
37.	The PE will obtain a copy of the title deed, demonstrating legal ownership of the land by Ministry of Education /KUHeS Blantyre	Within 1 months of the Effective Date.	Submit to MIGA the Land title deed and other relevant ownership documentations.
38.	The PE shall undertake a vulnerability assessment of 13 displaced HHs to determine household vulnerability to include in the Livelihood Restoration Plan. The assessment should inform the approaches that will be provided to identify and support vulnerable groups that may have pre-existing vulnerability or be disproportionately affected by Project land-take.	Within 2 months of the Effective Date.	Submit to MIGA the vulnerability assessment for the 13 Displaced farmers.
39.	The PE will develop and implement a livelihood restoration plan (“LRP”). The plan shall be designed to compensate affected 13 farmers and offer other assistance to meet the objectives of PS5. The LRP shall establish the entitlements of affected persons and/or communities and shall ensure that these are provided in a transparent, consistent, and equitable manner.	Within 2 months of the Effective Date.	Submit to MIGA the LRP for review.
40.	The PE will develop a Grievance Mechanism that is transparent, accessible, and accountable through which affected parties can express grievances and to sustain good relations between the project and its stakeholders. The grievance mechanism should include a mechanism for identifying and validating the 7 remaining displaced households (farmers) that have not been contacted. The mechanism should outline:	Within 2 months of the effective date	Submit to MIGA a Grievance Mechanism to manage the Affected farmers

**Environmental & Social Action Plan Lilongwe University of Agriculture and Natural Resources (LUANAR), Bunda Campus #15734 (November 2021)**

No.	Performance Standards	Due Dates	Deliverable
<b>PS1: Assessment and Management of Social and Environmental Risks and Issues</b>			
1.	The Project Enterprise (PE) and Engineering, Procurement and Construction Contractor (EPC) will develop the Project specific Environmental and Social Management System (ESMS) for construction and operations that conforms with Malawian laws and in line with MIGA PSs as well as applicable WBG Environmental Health and Safety (EHS) guidelines. The ESMS will include the following items: (i) E&S Policy; (ii) Health and Safety (H&S) Policy (health safety and environmental monitoring and reporting); (iii) definition of organizational capacity, responsibilities and competence; and (iv) E&S management programs and plans (such as emergency preparedness and response mechanisms, management of hazardous and non-hazardous waste, and stakeholder engagement).	Within 2 months of the Effective Date	Submit to MIGA the Investment Project ESMS system document and evidence of implementation (e.g., procedures, checklists, aspects / impacts register)
2.	The PE will develop Project Gender Based Violence and Harassment (GBVH) Risk Management Plan that conforms with Malawian laws and is aligned with MIGA's PSs 1, 2, and 4. The GBVH Risk Management Plan will include the GBVH Policy and disseminated to all students residing in the hostels and to the staff who will be working in the hostels especially security personnel. a) GBVH Risk Management Plan. b) GBVH Policy	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA: a) GBVH Risk Management Plan. b) GBVH Policy
3.	The PEs will include specific OHS requirements and E&S risk management clauses in the EPC and O&M contractor contracts to be in line with MIGA's PS requirements. These clauses will include guidance on managing Project E&S risks such as on Occupational Health and safety, hazardous materials and hazardous waste management, pollution prevention, working conditions and workers safety, Gender Based Violence and Harassment (GBVH) and community safety.	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA the EPC and O&M contractor's contract for MIGA's review and approval
4.	The PE and EPC and O&M contractor will develop the EHS Policy as part of the ESMS update to include management of social risks to guide the project to achieve sound environmental and social performance in line with MIGA PS 1.	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA the PE and EPC and O&M contractor's HSE policies document
5.	PE will develop and implement a Sexual Harassment Policy (SHP) for construction and Operation phases in line with national laws and MIGA PS 1. The SHP will clearly	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA SHP

	define the roles and responsibilities of the PE, EPC, O&M, students, workers and community members.		
6.	The PE will be required obtain the environmental ESIA certificate and operational permits for all the 3 developments and establish measures to implement and comply with the permit's requirements in line with the Malawi national laws and MIGA's E&S requirements.	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA copies of environmental and operational permits
7.	PE will require the EPC and O&M Contractors to develop Project specific Project ESMPs for construction and operation phases to include monitoring and reporting requirements in line with MIGA's PS and WBG EHS guidelines.	i) Within 1 months of the Effective Date. ii) 30 days prior to Project Operation	Submit to MIGA the i) Updated ESMP for construction ii) ESMPs for Operation ESMP
8.	PE will require that the EPC contractors to trains and ensure all workers and site management are aware of the Project management plans/procedures and their operational requirements.	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA Training materials and records
9.	PE and EPC contractors will be required to appoint a qualified EHS Manager to manage the 3 projects and any additional EHS officers if needed in line with the requirements of MIGA's PS1 during the Projects construction and operations phases.	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA the appointed HSE Manager and HSE officer's CVs
10.	The PE will ensure that all 3 development designs conform with relevant Malawi Bureau of Standards specifications and IFC/ US National Fire Protection Association (NFPA 101) guidelines	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA the 3 development designs with fire protection specifications.
11.	The PE will require the EPC and O&M contractor to develop a comprehensive Emergency Preparedness and Response Plan (EPRP) to address the facility wide risks including fire and other external emergencies for the Project construction and operation. The EPRP will articulate the steps needed to collaborate with nearby communities, local government agencies, and relevant third parties to facilitate response to emergency situations to prevent and mitigate harm to people and/or the environment. i) EPRP for construction phase ii) EPRP for O&M phase	i) Within 1 months of the Effective Date. ii) 30 days prior to Project Operation	Submit to MIGA: i) EPRP for construction phase ii) EPRP for operation phase.
12.	PEs will require the EPC and O&M contractor to equip all sites with firefighting equipment including adequate fire extinguishers on sites that are regularly inspected and well maintained in line with the national law and with the requirements of MIGA' PS1.	Within 1 months of the Effective Date	Submit to MIGA photographic evidence of fire extinguishers equipped on Project sites.



13.	<p>a) PE will require the EPC Contractor to conduct monthly EHS inspections per contractual agreements and develop an EHS monitoring procedures and ensure that all the EHS monitoring reports are detailed and includes EHS risks, OHS statistics, and mitigation measures during the construction phase.</p> <p>b) For the Operations phase, the PE will require the O&amp;M contractor to conduct Project monitoring and EHS inspections</p>	<p>Within 1 months of the Effective Date</p> <p>Ongoing</p>	<p>Submit to MIGA:</p> <p>a)</p> <p>i) EHS inspections reports</p> <p>ii) EHS monitoring procedures</p> <p>iii) Report as part of Annual Monitoring Report</p>
14.	<p>The PE will hire an independent party GBVH monitoring consultant who will be responsible to conduct Project GBV risks assessments, monitoring and reporting during the Project construction and operation.</p>	<p>a) Prior to MIGA Contract of Guarantee (CoG) signing</p> <p>b) Annual Monitoring Report Format agreed.</p>	<p>Submit to MIGA:</p> <p>a) GBVH third Party monitoring consultant CVs</p> <p>b) Annual GBVH Risk Assessment reports.</p>
15.	<p>The PE will be required to develop a Stakeholder Engagement Plan (SEP) which covers its construction and operations phases.</p>	<p>Within 1 months of the Effective Date</p>	<p>Submit to MIGA SEP.</p>
16.	<p>a) The PE, EPC and O&amp;M Contractor will develop a project specific Community Grievance and External Communication Mechanism that includes GBVH reporting mechanisms, in line with the requirements of MIGA PS 1 for the Project construction and operation phases.</p> <p>i. PE and EPC contractor</p> <p>ii. O&amp;M Contractor</p> <p>b) The PE with the support of OMM and Universities management will develop an integrated and effective external grievance mechanism for the Universities that includes GBVH reporting mechanisms, that is enforced, and implemented effectively throughout the project lifecycle in line with the requirements of MIGA's PS1 for the Project construction and operations phases.</p>	<p>a)</p> <p>i. Within 1 months of the Effective Date</p> <p>ii. 30 days prior to operations</p> <p>b) Within 1 months of the Effective Date</p>	<p>Submit to MIGA</p> <p>a)</p> <p>i) PE and EPC Community Grievance and External communication Mechanism.</p> <p>ii) O&amp;M Community Grievance and External communication Mechanism.</p> <p>b) University Community Grievance and External communication Mechanism.</p>
17.	<p>PE with the support of OMM, the College/University management, the Government of Malawi through the Ministry of Gender and development the Malawi Human Rights or other NGOs will identify and train university staff who will be responsible for investigating cases of GBVH that may be reported</p>	<p>Within 1 months of the Effective Date</p>	<p>Submit to MIGA Training records, materials, and staff attendance registers.</p>
<p><b>PS2: Labor and Working Conditions</b></p>			
18.	<p>The PE and EPC and O&amp;M contractor will develop Human Resources (HR) policy and procedures that are Project specific during construction and operation to ensure they are in line with MIGA's PS2 and Malawi laws. The EPC and O&amp;M contractor will ensure that all direct and indirect</p>	<p>Prior to MIGA Contract of Guarantee (CoG) signing</p>	<p>Submit to MIGA the PE and EPC and O&amp;M contractor's HR policy aligned with PS2 and evidence on its</p>

	employees are aware of its content. PE will also ensure that EPC and O&M contractor apply these to their sub-contractors.		dissemination to contractors and employees
19.	The PE will also engage a technical expert to support the PE's Human Resources Manager and team to strengthen gender-related policies, write new policies and develop a communication and training plan for sensitization of these policies across the students, staff and entire workforce working in the three accommodation facilities during construction and operation phases.	Within 1 months of the Effective Date	Submit to MIGA the Consultants CVs who will support the HR team.
20.	The PE will develop Workers Code of Conduct (CoC) procedure for the Project construction and operation phase. The CoC will reflect respect for local beliefs and customs and with special attention for risks related to sexual harassment, sexual exploitation and abuse and gender-based violence harassment (GBVH) and ensure all existing Project personnel are trained on and have signed all gender-related policies, including awareness of the Code of Conduct, sexual harassment policy and the grievance redress mechanism for reporting allegations of sexual harassment in workplaces	Prior to MIGA Contract of Guarantee (CoG) signing.	Submit to MIGA Workers Code of Conduct (CoC) Procedure.
21.	As Part of creating awareness on GBVH, the PE will require the EPC and O&M Contractors in the three projects to design and print posters of simplified versions of the workers Code of Conduct in (English and Chichewa) in the Project sites during construction and Students Code of Conduct in (English and Chichewa) in the students accommodation facilities once operational and ensure these are visibly displayed in multiple locations. <ul style="list-style-type: none"> <li>a. Posters for workers Code of Conduct in (English and Chichewa) in the Project sites</li> <li>b) Posters for Students Code of Conduct in (English and Chichewa) in students accommodation facilities.</li> </ul>	<ul style="list-style-type: none"> <li>a) Within 1 months of the Effective Date</li> <li>b) 30 days prior to Operations</li> </ul>	Submit to MIGA photographic evidence of the posters at the project sites and within student's accommodation facilities.
22.	The PE will develop and implement the grievance redress mechanism so all gender-related allegations, including sexual harassment, are referred to and investigated by an internal sexual harassment and abuse committee, comprising the HR Manager/representative, the Student Advisor and at least one workers' representative in line with the requirements of MIGA's PS1 for the Projects construction and operations phases	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA the PE's GRM
23.	PE, EPC and O&M contractor will develop worker grievance mechanism and ensure it adequately captures how GBVH cases are received, screened, tracked, and	a) Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA <ul style="list-style-type: none"> <li>a) EPC's workers grievance mechanism</li> </ul>

	<p>responded to in line with MIGA PS2 requirements during the construction phases.</p> <p>a) EPC's workers grievance mechanism</p> <p>b) O&amp;M's workers grievance mechanism</p>	b)30 days prior to Operations.	b) O&M's workers grievance mechanism
24.	The PE will require the EPC Contractors to establish policies and procedures for managing and monitoring the E&S performance of such third-party employees per MIGA's PSs, as well as incorporating these requirements in contractual agreements with third-party employees, as identified.	Within 1 months of the Effective Date	Submit to MIGA Third party employee policies and procedures
25.	The PE will ensure that EPC and O&M contractor will develops and implements site-specific Occupational Health and Safety (OHS) procedures for the construction and operations phases detailing out the following issues: These procedures will cover the following issues: i) hazard identification and assessment; ii) construction site safety, iii) specific procedures for hazardous works, worker's safety and training iv) use of personal protective equipment; v) implement a worker's health program to screen the health of workers and measures to manage diseases (such as Malaria, Typhoid, Ebola and COVID-19); vi) site supervision and audit procedures; vii) incident investigations and reporting system and intervention measures (medical surveillance programs and first aid etc.).	Within 1 months of the Effective Date	Submit to MIGA the EPC and O&M contractor's OHS procedures and plan
26.	PE will develop its policies and procedure to addresses the risks and impacts of COVID-19 to workers and communities in line with MIGA PS 1, 2 and 4.	Prior to MIGA Contract of Guarantee (CoG) signing	Submit to MIGA updated policies and procedures
<b>PS3: Resource Efficiency and Pollution Prevention</b>			
27.	The PE will require the EPC and O&M contractor to develop water management plan which details options available for water sources, water use, treatment requirements, water usage monitoring and estimated consumption during the construction and operations phase.	Within 1 months of the Effective Date	Submit to MIGA Water Management Plan
28.	<p>PE will be required to:</p> <p>i) Obtain water abstraction permits/license from regulatory authority.</p> <p>ii) conduct a water risks assessment and consider the water resource/groundwater availability, impacts on surrounding users and ecological flow in line with MIGA PS3</p>	<p>i. Prior to MIGA Contract of Guarantee (CoG) signing.</p> <p>ii. Within 1 months of the Effective Date</p>	<p>i) Submit to MIGA water abstraction permits/license</p> <p>ii) Water risks assessments study/report</p>

29.	The PE will require the EPC to develop a waste management plan for projects in line with MIGA' PS 3 requirements for construction and operations phase.	Within 1 months of the Effective Date	Submit to MIGA waste management plan for construction and operations phase
<b>PS4: Community Health, Safety and Security</b>			
30.	PE will develop a Community Health and Safety Plan (including STI HIV/AIDS, cholera, and malaria prevention) to mitigate for community exposure to disease during construction and operations.	Within 1 months of the Effective Date	Submit to MIGA Community Health and Safety Plan.
31.	PE will require the EPC Contractor to develop Project Labor Influx Management Plan in line with MIGA PS 2 and 4	Within 1 months of the Effective Date	Submit to MIGA Labor Influx Management Plan.
32.	PE shall partner with the Ministry of Health and health-based NGOs to carry out a health care facilities quality assessment to determine the medical needs of the health facilities on the campuses to manage cases of GBVH which are reported. Based on the results of the quality assessment, identify opportunities, and develop measures to improve the services offered.	Within 1 months of the Effective Date	Submit to MIGA the health care facilities quality assessment report and improvement measures.
33.	The PE will collaborate with OMM, University, Ministry of Health, Ministry of Gender, Children Disability and Social Welfare to create a Trauma center to support and provide counseling for GBVH survivors.	Within 1 months of the Effective Date	Submit to MIGA the establishment of the Trauma Center.
34.	The PE will require the EPC and O&M contractor to develop and implement the following plans and ensure to capture key elements of MIGA's PS4: a) Security Risk Assessment; and b) Security Management Plan	Within 1 months of the Effective Date	Submit to MIGA the following plans: a) Security Risk Assessment and b) Security Management Plan
35.	The PE will ensure that the all the Security officers sign the SHP and the CoC and that they are all trained on GBVH and on CoC so that they can assist in GBVH cases identification, reporting, enforcement, and implementation of the CoC.	Within 1 months of the Effective Date	Submit to MIGA Security Officer Training records material.