

REDRESS ACTION PLAN

PS ¹	Objective	Compliance requirements that need to be met (as part of ESIA)	Corrective Action Required
PS 1: Assessment and Management of Environmental and Social Risks and Impacts			
PS 1	<p>The stated objectives of PS 1 are to:</p> <ul style="list-style-type: none"> ▪ Identify and assess the environment and social risks and impacts of the project; ▪ Apply a mitigation hierarchy to avoid (or where avoidance is not possible, minimize, mitigate, compensate for, or offset) adverse risks and impacts on workers, affected communities, and the environment; ▪ Promote improved environmental and social performance of on the part of the Project, through the development and implementation of effective management systems; ▪ Ensure that potential grievances and other communications from affected communities are evaluated, and appropriately and systematically addressed in a grievance redress mechanism; and ▪ Ensure that affected communities are appropriately engaged regarding environmental and social issues that could potentially affect them over the entire project life cycle. 	<p>International Finance Corporation (IFC) Performance Standard (PS) 1² establishes Environmental and Social Management System (ESMS) requirements for all projects that have environmental and social risks and impacts. PS 1 includes specific requirements for public consultation and disclosure, including the establishment of appropriate grievance mechanisms, and underscores IFC's interest in ensuring that the project proponent systematically identifies and effectively manages the environmental and social risks and impacts that may occur over the life of a project.</p>	<p>Apply disclosure process that includes:</p> <ul style="list-style-type: none"> ▪ Feedback of compensation process/ tenure arrangement ▪ Announces the of cut off date for claims ▪ Kick into effect a general grievance mechanism that would be applicable to the compensation process as well as the labour component going into the construction phase. <p>Further focus group meetings Will be held to gather data on the social and economic status of 'vulnerable' people in the three villages. Data on water sources, water availability and water accessibility will also be extended.</p>
PS 2: Labour and Working Conditions - Not required as a corrective action in ESIA, but Management Plans will be required prior to construction phase.			
PS 4: Community Health, Safety, and Security - Not required as a corrective action in ESIA, but Management Plans will be required prior to construction phase.			
PS 5: Land Acquisition and Involuntary Resettlement – Not required in its entirety as a corrective action as the Project will require a tenure leasing arrangement. However key IFC PS 5 requirements will be adopted to reach best practice.			
PS 5	<p>The specific objectives of this PS are:</p> <ul style="list-style-type: none"> ▪ To avoid, and when avoidance is not possible, minimize displacement by exploring alternative project designs; ▪ To avoid forced eviction; ▪ To anticipate and avoid, or where avoidance is not possible, minimize adverse social and economic impacts from land acquisition or restrictions on land use by (i) providing compensation for loss of assets at replacement cost and (ii) ensuring that 	<p>As with PS 1</p> <ul style="list-style-type: none"> ▪ Consultation and disclosure, including the establishment of appropriate grievance mechanisms. These would however target the Project Affected Population (PAPs) 	<p>The corrective action proposed herein acknowledges that this project does not constitute land acquisition and/or involuntary displacement, and will instead be a leasing arrangement of the unused land. A RAP and LRP are not prescribed, however the proposed action herein is based on the fact that all actions are required to be documented and verifiable for the Lenders purpose.</p>

¹ Note: PS 3 and 6 are environmental in nature and therefore are not discussed here.

² See (IFC, 2012) IFC Performance Standards on Environmental and Social Sustainability. World Bank/International Finance Corporation, Washington, DC. January 1, 2012.

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	<p>resettlement activities are implemented with appropriate disclosure of information, consultation, and the informed participation of those affected;</p> <ul style="list-style-type: none"> ▪ To improve, or restore, the livelihoods and standards of living of displaced persons; and ▪ To improve living conditions among physically displaced persons through the provision of adequate housing with security of tenure at resettlement sites 		<p>Apply disclosure process that includes (as in PS1):</p> <ul style="list-style-type: none"> ▪ Feedback of compensation process/ tenure arrangement ▪ Announces the of cut off date for claims ▪ Kick into effect a general grievance mechanism that would be applicable to the compensation process as well as the labour component going into the construction phase. <p>A reporting and monitoring mechanism will be required. A Land tenure arrangement report which is accompanied by a (standalone/ or annexure) Livelihood monitoring report is proposed.</p> <p><u>Purpose of the Tenure arrangement report :</u></p> <ul style="list-style-type: none"> ▪ It is a 'once off' report ▪ The entire process will be documented with verifiable data ▪ It will reflect all relevant parties' involvement (including the Compensation Committee, Valuers and Lawyers) ▪ It will show the valuation approval by the Government valuer (as an independent party) ▪ It will detail the full list of landowners and the corresponding leasing compensation rates (with sign off). <p><u>Purpose of the Livelihood monitoring report</u> (either standalone or Annex to Tenure arrangement report)</p> <ul style="list-style-type: none"> ▪ It will substantiate the present livelihood status of the PAPs (pre and post lease re-imburement) ▪ It should ideally be updated on a yearly basis for the 25 year lease period ▪ This will act as the livelihood monitoring of PAPs that is typically required by Lenders.
PS 7: Indigenous People: Not applicable in this Project			
PS 8: Cultural Heritage			
PS 8	<p>The specific objectives of this PS are:</p> <ul style="list-style-type: none"> ▪ To protect cultural heritage from the adverse impacts of project activities and support its preservation. 	<ul style="list-style-type: none"> ▪ Impacts to culture and heritage to be assessed (as per PS1) 	<ul style="list-style-type: none"> ▪ Can include a chance-find procedure now or prior to the construction phase.

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	<ul style="list-style-type: none"> ▪ To promote the equitable sharing of benefits from the use of cultural heritage. 		

PS5

PS 5 is not fully triggered. There is no 'involuntary resettlement', nor is there actual 'land acquisition'. There is no eviction and no expropriation. The leasing arrangement that is sought will be reported on by OnePower within a Tenure arrangement report which will render all detail related to the land arrangement, from the very beginning to current state. Ideally, all supporting valuation documentation and legal contracts should be encompassed within.

Livelihood Monitoring Report

Consultation with PAPs had been in process since 2017. It has been established that some PAPs had, in the past, undertaken farming on the land sought for the proposed development. While all PAPs had been given the opportunity to continue farming with the potential for full compensation for crop lost, all PAPs had decided not to partake in farming.

The Project must fully understand the status quo of PAPs' livelihoods and how it is likely to change with the onset of the Project. To do this, OnePower will have to perform an intensive investigation into the livelihood profile of each PAP, and commit to providing equitable restitution for livelihoods that may be lost. As a best practice approach, it is advisable that landowners taking receipt of rental re-imbursment, be trained to perform household money management responsibilities that enhance self-sufficiency.

As a first step, the 36 affected PAPs (and their household) must be more fully investigated to answer the following:

- a) Understand the current livelihood status,
- b) Income vs expenses,
- c) Is there a difference in food security now that the land is not being farmed?
- d) How did households supplement income in the 2016, 2017, 2018 years?
- e) What will PAPs do with the rental re-imbursments? (**Note – the value of the compensation must be known by this time),
- f) Would it be better if they received the rental re-imbursment each quarter or each month?
- g) Do the wives and husbands have an equal right to the rental re-imbursment and its use?
- h) Will the PAP (husband and wife) require individual money management and expenses training?
- i) Which of the 36 households are classified as 'vulnerable.' What specific assistance would be required by such a household in terms of managing the rental re-imbursment?
- j) Will the PAP want to farm on this land when the lease period expires?

The culmination of all data must lend to the production of a Livelihood monitoring report that will give evidence to compensation eligibility, rates, uses of the re-imbursment and an assessment of the household's progress and advancement. Monitoring will ideally be undertaken quarterly during the Project construction Phase, and annually during the Project operation phase. All Corporate Social Investment actions and intentions can be included within the Plan.