

## Environmental & Social Action Plan for Burapha Project 7/18/2023

	Performance Standards (“PS” or “MIGA PS”)	Due Dates	Indicators for completions
	<b>PS1: Assessment and Management of Environmental and Social Risks and Impacts:</b>		
1.	For existing and expansion, Burapha to i) agree with MONRE on a process of receiving Environmental Clearance Certificates (ECCs) for the 1500 ha outside the PFA areas (ii) agree with Xayabouri provinces, Vientiane provinces and Vientiane Prefecture on a process of receiving Environmental Clearance Certificates (ECCs) for all plantations; and (ii) follow the process agreed and prepare required environmental and social documents; and (iii) to receive ECCs for all plantations.’	(i) Prior to Contract of Guarantee (CoG) Signing  (ii) Within 1 year of the Effective Date of the CoG  (iii) Prior to clearance for new plantations [or per timeline agreed in writing with the Provincial Government]	(i) Written agreement from MONRE on a process for ECC for the 1500 ha existing plantations outside of the PFA without ECC  ii) Written agreement with Xayabouri , Vientiane provinces and Vientiane Prefecture on a process for ECC for existing plantations without ECC(1500 ha) and for the expansions(60,000 ha).  (ii) Environmental and social documents prepared to obtain ECC.  (iii) Copy of ECC for all plantations.
2	Burapha will conduct a climate risk and vulnerability assessment to identify the materiality of climate change risks to their operations and define appropriate climate resilience measures where necessary	Within 6 months of the Effective Date of the CoG.	Climate risk and vulnerability assessment
3.	Burapha will update the production forest areas (PFA) manual to include (i) clear site selection criteria combining both environmental and social considerations; (ii) procedure for summary impact assessment with corresponding measures; and (iii) entitlement matrix.  The environmental and social considerations will include, but not be limited to biodiversity risks, potential for “leakage” (i.e. local communities to open new swidden areas to replace areas lost to Burapha plantations), location of sensitive receptors for	Within 4 months of the Effective Date of the CoG.	Burapha to submit to MIGA updated PFA Manual

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	<p>potential noise impacts and consideration of potential cumulative impacts on water resources).</p> <p>The PFA manual will clearly state that plantations in natural and critical habitat will be avoided.</p>		
4.	<p>To enhance capacity to manage environmental and social, Burapha will hire:</p> <ul style="list-style-type: none"> <li>• An additional qualified health, safety, and environment (HSE) superintendent;</li> <li>• An additional community liaison officer (CLO); and</li> <li>• A biodiversity consultant</li> </ul>	Within 3 months of the Effective Date of the CoG.	Submit to MIGA appointment letters and CVs for HSE superintendent; CLO and biodiversity consultant
5.	Burapha will update its stakeholder engagement plan to include (i) community engagement and communication procedure to facilitate regular communication with villages during the period between securing consent and starting to plant; and (ii) stakeholder engagement register.	Within 6 months of the Effective Date of the CoG	Submit to MIGA the updated stakeholder engagement plan.
<b>PS2: Labor and Working Conditions</b>			
6.	Increase capacity to manage risks related to gender-based violence (GBV) by (i) conducting training on GBV-related policies and procedures; and (ii) identify and include a referral mechanism for GBV services.	Within 3 months of Effective Date of the CoG	Submit to MIGA the following: i) Training materials developed on GBV and records of training; ii) Procedure for referral to GBV service providers.
7.	Burapha will finalize the Labor Engagement Plantation Establishment Procedure.	Within 2 months of Effective Date of the CoG.	Submit to MIGA the final Labor Engagement Plantation Establishment Procedure
8.	Burapha will update the camp establishment procedure to be in line the IFC and the European Bank for Reconstruction and Development (EBRD) Guidance Note on Worker Accommodation Process and Standards (2009).	Within 3 months of Effective Date of the CoG.	Submit to MIGA the updated Camp Establishment Procedure

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9.	<p>Burapha will develop and implement a supply chain risk assessment and management plan for ongoing evaluation of its primary suppliers. The management plan will include procedures for identifying where the supply is coming from; and any risks related to labor (including risk of child and forced labor) and biodiversity (including risk of conversion of naturel and / or critical habitats). It will also include measures to minimize impacts, including limiting the procurement to suppliers that are adequately managing labor-related risks and that can demonstrate that they are not contributing to significant conversation of natural habitat.</p> <p>i) Terms of reference for development of supply chain risk assessment and management plan, including list of current suppliers current suppliers, volume of product supplier, geographical location of supplier.</p> <p>ii) Engage an external consultant to conduct the supply chain risks assessment.</p> <p>iii) Completion of the supply chain risks assessment and management plan.</p>	<p>i) Within 2 months of the Effective Date of the CoG.</p> <p>ii) Within 4 months Effective Date of the CoG.</p> <p>iii) Within 9 months of Effective Date of the CoG.</p>	<p>i) Terms of reference for development of supply chain risk assessment and management plan</p> <p>ii) Consultant engaged.</p> <p>iii) Submit to MIGA the project supply chain risk assessment and management plan</p>
<b>PS3: Resource Efficiency and Pollution Prevention</b>			

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<b>10.</b>	Burapha will develop water quality management and monitoring plans(including wastewater ) for (1) plantation operations and (2) the mills in line with national and MIGA PS requirements.	Within 3 months of Effective Date of the CoG.	Submit to MIGA the water quality management and monitoring plans (including wastewater) for:  i) Plantation operations. ii) Mills
<b>11.</b>	Burapha will develop an (i) air quality management and monitoring plan for the mill operations, which will include (ii) monitoring boiler stack emissions for NOx, SOx, PM10 and develop air quality monitoring reports to be shared with MIGA annually.	(i) Within 3 months Effective Date of the CoG;  (ii) Annually for 3 Years (2023-2026)	Submit to MIGA: (i) air quality management and monitoring plan and (ii) air quality monitoring Annually for 3 years
<b>12.</b>	Burapha will update the mills and the plantation’s general waste management plans fully align with PS 3 and WBG EHS Guidelines	Within 6 months of Effective Date of the CoG.	Submit to MIGA the updated mills and the plantation’s General Waste Management Plans .
<b>13.</b>	<ul style="list-style-type: none"> <li>i) Burapha will install a larger hazardous material store/ facility to manage the increased plywood volumes of hazardous materials (waste and non-waste products). Conduct an inventory and assessments of the hazardous waste types and volumes.</li> <li>ii) Prepare design of hazardous waste facility</li> <li>iii) Completion of the hazardous waste facility.</li> </ul>	<ul style="list-style-type: none"> <li>i) Within 2 months of Effective Date of the CoG.</li> <li>ii) Within 6 months of Effective Date of the CoG.</li> <li>iii) Within 12 months Effective Date of the CoG.</li> </ul>	<ul style="list-style-type: none"> <li>i) Share the inventory list of hazardous waste types and volumes.</li> <li>ii) Share the designs of the hazardous waste facility.</li> <li>iii) Submit to MIGA photographic evidence of the hazardous waste facility</li> </ul>
<b>14.</b>	Burapha will engage a service provider to finalize commissioning of the sewage treatment plant, and to address current water contamination issues at the sediment treatment pond.  i) Term of Reference for the sewage treatment plant	<ul style="list-style-type: none"> <li>i) Within 2 months of Effective Date of the CoG.</li> <li>ii) Within 3 months of Effective Date of the CoG.</li> <li>i)iii) Within 9</li> </ul>	Submit to MIGA the following :  <ul style="list-style-type: none"> <li>i) Terms of reference for sewage treatment plant commissioning</li> <li>ii) Service provider engaged</li> <li>iii) Complete the plant</li> </ul>

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	commissioning. ii) Engage a service provider iii) Commission the sewage treatment plant.	months Effective Date of the CoG.	commissioning.
<b>PS4: Community Health, Safety and Security</b>			
<b>15.</b>	Burapha will develop a security management plan, including training requirements and code of conduct for security personnel in line with MIGA PS4 requirement.	Within 2 months of Effective Date of the CoG.	Submit to MIGA Burapha’s security management plan
<b>PS5: Land Acquisition and Involuntary Resettlement</b>			
<b>16.</b>	Burapha will develop a livelihood monitoring plan to monitor the livelihood conditions of PFA land users, including vulnerable land users	Within 9 months of Effective Date of the CoG.	Share with MIGA livelihood monitoring plan.
<b>PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>			
<b>17.</b>	Burapha to consult with relevant stakeholders and prepare a SMA management framework outlining options and associated costs, such as community conservation agreements.	Within 3 months of Effective Date of the CoG.	SMA management framework
<b>18.</b>	Burapha undertake a survey of the Endangered Northern White-cheeked Gibbon <i>Nomascus leucogenys</i> at the Na-An plantation. This survey should be done by a qualified primatologist who has experience with this species. If the gibbon or other threatened primate is present, Burapha will prepare a BMP to prevent impacts on this species from current and future activities.  i) Develop an interim management plan based on CHA recommendations findings for the areas that might have populations.  ii) Terms of reference for conducting the surveys.	          i) Within 2 months of the Effective Date of the CoG.  ii) Within 2 months of the	Completion of the survey, and report and associated BMP if present.  i) Interim management Plan developed. ii) Terms of reference for the Survey. iii) Primatologist engaged and the survey commenced. iv) Submit to MIGA the completed surveys and

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	iii) Engage a qualified primatologist and commence the survey. iv) Completion of the surveys and reports	Effective Date of the CoG. iii) Within 2 months of the Effective Date of the CoG. iv) Within months 3 of the Effective Date of the CoG. v) Within 6 months of the Effective Date of the CoG .	reports
<b>PS8: Cultural Heritage</b>			
<b>19.</b>	Conduct training on Chance Find Procedure for Burapha’s operations staff and contractors.	Within 2 months of the effective date.	Training plan/schedule