

## Environmental and Social Action Plan – Transgabonaise Road Stage 1A

<b>DRAFT ESAP</b>			
#	Action	Deliverables	Timeline
<b>Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts</b>			
1	SAG will require the new Engineering Procurement and Construction (EPC) contractor to: (a) develop and implement Project specific Environmental and Social (E&S) policies in response to commitments captured by existing SAG policies; and (b) cascade the Project specific E&S policies to its sub-contractors and oversee their implementation.	<ul style="list-style-type: none"> <li>a) Environmental and Social Policies by the new EPC contractor</li> <li>b) E&amp;S policies to be included within contractual documentation with each sub-contractor.</li> </ul>	a) and b) Prior to the start of construction activities by the new EPC.
2	SAG will commission an Environmental and Social Impact Assessment (ESIA) line with PS 1 requirements for new auxiliary facilities, as needed by the new EPC contractor.	Environmental and Social Impact Assessment for auxiliary facilities	Prior to the start of construction activities by the new EPC.
3	The new and existing EPC contractor shall develop and implement a closure/ rehabilitation management plan for the auxiliary facilities (camps, material sites, borrow pits) as needed.	Closure/ rehabilitation management plan	3 months prior to decommissioning
4	<p>The new and existing EPC shall:</p> <ul style="list-style-type: none"> <li>a) undertake an environmental assessment that includes an alternatives assessment for the borrow pit locations and spoil disposal sites taking into account E&amp;S considerations such as resettlement and biodiversity (assess whether they impact Natural Habitat and Critical Habitat), presence of water bodies. The environmental assessment will inform the siting of the borrow pit(s) and spoil disposal sites and respective mitigation measures; and</li> <li>b) obtain the required permits or licenses; and</li> </ul>	<ul style="list-style-type: none"> <li>a) Environmental Assessment report</li> <li>b) Copy of Environmental permit</li> <li>c) Updated E&amp;S management plans</li> </ul>	<ul style="list-style-type: none"> <li>a) Prior to selection of borrow pit and spoil disposal sites</li> <li>b) In line with national regulations timeline and prior to starting activities on borrow pits and spoil disposal sites; and</li> <li>c) 60 days after environmental assessment</li> </ul>

Environmental and Social Action Plan  
Transgabonaise Road – Stage 1A - Gabon

	c) incorporate the findings of the environmental assessment in the respective environmental and social management plans.		
5	SAG and the new EPC contractor will develop and implement a Gender Action Plan to address risks of GBV	Gender Action Plan	Before the start of construction activities of the new EPC.
6	<p>a) The new EPC contractor will develop construction management plans in line with the Framework Environmental and Social Management Plan referenced in the ESIA including monitoring and audit specifications.</p> <p>b) SAG will develop and implement an Operations Environmental and Social Management Plan for the operation and maintenance of the road.</p>	<p>a) Construction E&amp;S Management Plans for KP12-105</p> <p>b) Operations Environmental and Social Management Plans</p>	<p>a) Prior to the start of construction activities in the KP12 – KP105 sector</p> <p>b) One month prior to the start of operations</p>
7	<p>The Project shall engage and/or retain E&amp;S personnel required to deliver the Project in accordance with the Applicable Standards and provisions of this ESAP for (i) the construction phase and (ii) operations phase.</p> <p>For construction phase the new EPC contractor will be required to appoint E&amp;S personnel including: HSE manager, HR manager, HSE officers, and CLOs and maintain a ratio of 1 HSE officer for 50 workers.</p>	<p>a) For Construction:</p> <p>i. Organogram and reporting structure;</p> <p>ii. Job descriptions;</p> <p>iii. Short profiles or curricula vitae; and</p> <p>iv. Signed contracts abstracts.</p> <p>b) For Operations:</p> <p>i. Organogram and reporting structure;</p> <p>ii. Job descriptions;</p> <p>iii. Short profiles or curricula vitae; and</p> <p>iv. Signed contracts abstracts</p>	<p>a) Prior to the start of construction activities in the KP12 – KP105 sector</p> <p>b) Six months prior to the start of operations</p>
8	(a) The new EPC will develop and implement training plan and program validated by SAG on health, safety and environment including preventing and	<p>a) Training plan and program</p> <p>b) Training Program and Certificates</p>	a) Prior to the start of construction activities in the KP12 – KP105 sector

Environmental and Social Action Plan  
Transgabonaise Road – Stage 1A - Gabon

	<p>addressing GBV, that will be cascaded to the EPC contractor and sub-contractors.</p> <p>(b) Capacity Building on managing and addressing Gender Based Violence will be provided to as a minimum, the Community Liaison Officers and local community members supporting the CLOs</p>		<p>b) 60 days after effective date of Contract of Guarantee</p>
9	<p>a) Afcons will review and update the Emergency Preparedness and Response Plan (EPRP) to: (i) capture emergency scenarios related to fluvial transportation, emergency events during nighttime and emergency drills involving members of local villages along the road; and (ii) incorporate lessons learnt from emergency drills.</p> <p>b) The new EPC will develop and implement an EPRP for its activities.</p> <p>c) SAG will develop and implement an EPRP for operations.</p>	<p>a) Revised and updated Emergency Preparedness and Response Plan;</p> <p>b) New Emergency Preparedness and Response Plan for the new EPC activities.</p> <p>c) Operations Emergency Preparedness and Response Plan</p>	<p>a) 60 after effective date of Contract of Guarantee.</p> <p>b) One month prior to the start of operations</p>
10	<p>SAG will develop and implement a Stakeholder Engagement Plan for operations.</p>	<p>Develop and implement a Stakeholder Engagement Plan for Operations</p>	<p>One month prior to the start of operations</p>
11	<p>SAG will develop a communication plan together with the EPC to: (i) periodically inform local communities about construction work advancements; (ii) dissemination of the Grievance redress mechanism at the Makora quarry including selecting local community members to act in support of the CLOs in receiving grievances.</p>	<p>Communication plan</p>	<p>30 days after effective date of Contract of Guarantee</p>
<b>Performance Standard 2: Labor and Working Conditions</b>			
12	<p>The new EPC contractor will develop and implement HR policy and procedures in line with PS 2 requirements that sets out labor and working conditions and requirements for labor management and which includes but is not limited to: (i) freedom of association, unionization and collective bargaining; (ii) non-discrimination and equal opportunity;</p>	<p>Human Resources Policy and procedures</p>	<p>Prior to the start of construction activities of the new EPC</p>

Environmental and Social Action Plan  
Transgabonaise Road – Stage 1A - Gabon

	(iii) protection of workforce (including commitment against GBV).		
13	The new EPC will require its subcontractors to appoint an HR coordinator for interface with the new EPC HR team.	Short profiles or curricula vitae; and Letter of appointment.	Prior to the start of construction activities of the new EPC
14	SAG will validate the template for short-fixed term contracts prepared by the new EPC to be used by the local service providers in compliance with the Gabonese labor code, specifically in relation to termination clauses and in line with PS 2 requirements	Short term fixed contract template	Prior to the start of construction activities of the new EPC.
15	The new EPC will take into account IFC / EBRD guidance note <i>Workers' accommodation: processes and standards</i> (August 2009) when establishing the workers camp.	Camp Operation Plan	Prior to the start of construction activities of the new EPC.
16	SAG will commission a labour audit of the EPC and subcontractor semi-annually during construction. The Labor audits will be undertaken in accordance with the Gabonese Labor code and PS 2 requirements including but not limited to: <ul style="list-style-type: none"> <li>(i) employment terms and conditions of foreign and local workers;</li> <li>(ii) status of workers' contracts (no work to be undertaken without a valid contract);</li> <li>(iii) working hours;</li> <li>(iv) recruitment practices of local and foreign workers;</li> </ul>	Labour Audit Report	Semi-annually during construction
17	The new EPC contractor will develop and implement a workers Grievance Redress Mechanism (GRM) including channels for submitting complaints and will disseminate the GMR through induction and toolbox talk and other means of communication	Grievance redress mechanism	Prior to the start of construction activities of the new EPC.
<b>Performance Standard 3: Resource Efficiency and Pollution Prevention</b>			

Environmental and Social Action Plan  
Transgabonaise Road – Stage 1A - Gabon

18	The new EPC contractor will and implement an Air Quality and Noise Management Plan that includes monitoring program along the Project’s working zones and in response to grievances from members of the local communities.	Air Quality and Noise Management Plan	Prior to the start of construction activities of the new EPC.
19	The new EPC contractor will develop and implement a water quality and discharge management plan which includes monitoring of water quality at key locations such as the batching plant and underground tanks used for domestic and industrial effluents collection.	Water quality and discharge management plan;	Prior to the start of construction activities of the new EPC.
20	a) The new EPC contractor will develop a Hazardous Materials Plan for construction activities; and b) SAG will develop and implement a Hazardous Materials Management Plan for operations	a) Prior to the start of construction b) Hazardous Materials Management Plan for Operations	a) Prior to the start of construction activities of the new EPC b) Prior to the start of operations.
21	SAG will develop and implement a Pesticide use and management plan for operations	Pesticide use and management plan	Prior to the start of operations
<b>Performance Standard 4: Community Health, Safety and Security</b>			
22	SAG will develop and implement a Community Health and Safety Plan for Operations	Community Health and Safety plan for operations	Prior to the start of operations
23	a) The new EPC contractor will develop and implement traffic management plan for construction. b) SAG will develop and implement a traffic management plan for operations.	Traffic Management Plan for a) construction and b) Operations	a) Prior to the start of construction activities by the new EPC and b) Prior to the start of operations
24	SAG will: a) hire an NGO specializing in the fight against GBV to support the implementation of its Gender Action Plan and its CLO’s to assess the adequacy of measures to report and respond to GBV-related risks related to the Project; and b) Implement additional actions as needed to improve the efficiency of the measures in place	a) Signed contract with the NGO b) updated gender action plan with additional measures, as needed	a) 30 days after effective date of the Contract of guarantee b)As needed.

25	<p>a) The new EPC contractor will also be required to develop and implement a Security Management Plan which will include: (i) security and human rights training plan covering topics such as appropriate use of force, human rights, gender considerations, appropriate conduct towards workers and affected communities; (ii) training to be provided by a qualified Security firm with experience and knowledge of PS 4 requirements; (iii) appoint and or nominate security personnel in line with the SMP requirements taking into account the competency of security guards and background checks.</p> <p>b) SAG will develop and implement a SMP for operations;</p>	<p>a) Security Management Plan including (i) Security and Human Rights training plan; and (ii) Letter of reference of the qualified security firm to provide training; and (iii) letter of appointment of the security guards and short profiles or CV.</p> <p>b) Security Management Plan for operations</p>	<p>a) Prior to the start of construction activities of the new EPC</p> <p>b) Prior to the start of operations</p>
26	The new EPC will enter into a Memorandum of Understanding with the Gendarmerie (public security force) deployed for explosive transportation and blasting activities, if required.	Memorandum of Understanding	Prior to the start of construction activities of the new EPC
<b>Performance Standard 5: Land Acquisition and Involuntary Resettlement</b>			
27	SAG will finalize and implement the last Resettlement Action Plan (RAP) and Livelihood Restoration Plan (LRP) corresponding KP 12 to 24, and tollgates	Updated RAP and LRP	Prior to the start of resettlement activities
28	SAG will commission an external completion audit of the RAP and LRP to assess whether the provisions have been met and implement supplemental measures, where applicable, as well as any additional livelihood restoration measures	Resettlement Completion Audit	No later than 12 months following completion of the land acquisition process or livelihood restoration measures, whichever is later
<b>Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>			
29	SAG will develop and implement a (i) Biodiversity Management Plan to cover the finalization of construction activities, restoration and rehabilitation, and (ii) mitigation and monitoring measures for operations.	(i) Biodiversity Management Plan for construction, restoration, and rehabilitation	(i) Biodiversity Management Plan for Construction and restoration and rehabilitation BMP: prior to the start of new EPC contract and/or start of

Environmental and Social Action Plan  
 Transgabonaise Road – Stage 1A - Gabon

	The measures will apply to road upgrade and associated facilities, and the operation of the road.	(ii) Contract with a Biodiversity expert to monitor the implementation of biodiversity mitigation measures in the BMP	restoration and rehabilitation activities by current EPC.  (ii) BMP monitoring and mitigation measures during operations and contract with Biodiversity expert – 90 days after effective date of the Contract of Guarantee
30	SAG will develop and implement a Biodiversity Action Plan (BAP) after further studies to define the most effective measures for achieving Net Gain for forest elephants and chimpanzees, taking into account consultation with relevant stakeholders and the IUCN AARC Task Force.	(i) Framework Biodiversity Action Plan (ii) Final Biodiversity Action Plan	(i) Framework BAP by Board (ii) Final BAP per the timeline proposed in the framework BAP.
<b>Performance Standard 8: Cultural Heritage</b>			
31	The new EPC contractor will develop and implement a Cultural Heritage Management Plan and Chance Find Procedure	Cultural Heritage Management Plan and Chance find Procedure	Prior to the start of construction activities of the new EPC