

2165-01 WINECO 2 - HAITI

Environmental and Social Action Plan (or ESAP)

No.	Action	Deliverable	Delivery date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts			
1.1	Approve and implement the ESMS Manual aligned with the IDB Invest Sustainability Policy, IFC's Performance Standards, ISO 14001 standard and relevant Haiti's environmental and social laws.	<ol style="list-style-type: none"> ESMS Manual document approved by the Senior Management Team of the Company. Evidence of ESMS adoption. 	<ol style="list-style-type: none"> Before first disbursement. Before first disbursement.
1.2	Submit the Project's ESIA to the Ministry of the Environment for its consideration and obtain the corresponding Environmental License (EL).	<ol style="list-style-type: none"> Evidence of ESIA submission Environmental License 	<ol style="list-style-type: none"> 90 days after first disbursement. When issued by the Ministry of the Environment
1.3	Conduct yearly reviews of the Company's hazards and risks matrix and whenever a significant change in the way the Company undertakes its activities occur.	Updates of the Hazards and Risks Matrix	Annually as part of the Project's Environment and Social Compliance Report ("ESCR").
1.4	Produce and implement the following management plans: i) air quality; ii) noise and vibrations; iii) solid waste; iv) hazardous materials; v) effluents; vi) occupational health and safety; vii) community health and safety; viii) spill prevention, control and countermeasures; ix) contractor; x) change (MOC); and xi) incident investigation, nonconformities, corrective action, and preventive action.	<ol style="list-style-type: none"> Copy of each of the 10 plans. Evidence of the implementation of each of the 10 plans. 	<ol style="list-style-type: none"> 30 days after first disbursement Annually as part of the Project's ESCR. ESMS Monitoring reports
1.5	Strengthen the HSEQ team with the necessary professionals to support the implementation of the ESMS through all levels and departments of the Company, including at least: i) one HSE Coordinator; and ii) one Community Relations professional.	Copy of appointment of the HSEQ team professionals and update of the Organizational Chart in consequence.	Before first disbursement
1.6	Perform periodic assessments and drills of the Emergency Preparedness and Response Plan to ensure that all instructions, conditions, and activities laid out in the plan kept up to date.	Emergency Preparedness and Response Plan drills reports.	Annually as part of the Project's ESCR.
1.7	Conduct periodical internal and external E&S audits to regularly assess ESMS performance against Key Performance Indicators (KPIs).	Internal and external audits reports.	Annually as part of the Project's ESCR.
1.8	Perform an in-person Public Consultation (PC).	PC minutes	60 days after mobility restrictions due to the COVID 19 pandemic are lifted.
1.9	<ol style="list-style-type: none"> Disseminate and publicize the External Grievance Mechanism ("EGM") to communities and other affected parties and encourage them to submit inquiries, concerns, complaints and claims whenever necessary. Undertake a training program for the people responsible for the EMG management on dealing with sexual harassment and Gender Based Violence ("GBV") complaints 	<ol style="list-style-type: none"> Evidence of EGM dissemination. Report on grievances captured and managed by the EGM. Evidence of training performed. 	<ol style="list-style-type: none"> 60 days after first disbursement. Annually as part of the Project's ESCR. Annually as part of the Project's ESCR.
PS 2: Labor and Working Conditions			
2.1	Submit a summary of all claims presented and dealt through Internal Grievance Mechanism (IGM).	Report on claims presented and dealt through the IGM	Annually as part of the Project's ESCR.
2.2	Perform a site security and work conditions analysis to evaluate gender risks and, in case they are found, propose and execute the required management measures.	<ol style="list-style-type: none"> Report of site security and work conditions analysis. 	<ol style="list-style-type: none"> 180 days after first disbursement.

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		2. Report on the implementation of gender risk management measures.	2. Annually as part of the Project's ESCR.
2.3	Implement a Gender Action Plan to ensure that: i) all staff feel respected, safe, and valued in the workplace; ii) take proactive measures to prevent and eliminate gender discrimination; and iii) provide equal opportunities for all staff.	1. Gender Action Plan 2. Evidence of implementation	1. 180 days after first disbursement 2. Annually as part of the Project's ESCR.
2.4	Develop an Occupational Health and Safety (OHS) Plan, which will: i) comply with applicable Haitian regulatory requirements; ii) define the procedures for the management of occupational health and safety risks; iii) follow the guidelines of international best practices; iv) define roles and responsibilities for its implementation; v) define training needs; and vi) establish procedures for monitoring the efficiency of mitigation measures, the generation of reports, and the development and implementation of corrective actions.	Occupational Health and Safety (OHS) Plan	60 days after first disbursement.
2.5	1. Train all direct and indirect security personnel on: i) relevant national laws and regulations; and ii) good international practices, including the United Nations (UN) Basic Principles on the Use of Force and Firearms by Law Enforcement Officials and the UN Code of Conduct for Law Enforcement Officials in the hiring, rules of conduct, training, equipping, and monitoring of security personnel. 2. Perform background checks for all security personnel (including those hired by its contractors); 3. Perform internal audits to ensure the security personnel only uses force for preventive and defensive purposes and in proportion to the nature and extent of the perceived threat.	1. Security training reports. 2. Background check reports. 3. Internal audits reports	1. The first training should be undertaken within 60 days after first disbursement. Other trainings will be reported as part of the Project's ESCR. 2. Annually as part of the Project's ESCR. 3. Annually as part of the Project's ESCR.
PS 3: Resource Efficiency and Pollution Prevention			
3.1	Prepare an Energy and Water Management Reduction Program.	Energy and Water Management Reduction Program	180 days after first disbursement.
3.2	Present an annual inventory of GHG.	GHG inventory	Annually as part of the Project's ESCR.
3.3	1. Undertake Spill Prevention and Control trainings. 2. Perform periodical drills. 3. Verify the availability of appropriate recovery kits.	1. Evidence of spill prevention and control trainings. 2. Report of drills. 3. Report of the availability of recovery kits.	1. Annually as part of the Project's ESCR. 2. Annually as part of the Project's ESCR. 3. Annually as part of the Project's ESCR.
3.4	Expand the 2019 follow up analysis report by performing: i) a Phase II Environmental Site Assessment; ii) a remedial action plan for the cleaning-up of the contamination with a timetable and estimated implementation costs; and iii) an assets integrity program of the facilities, including all the tanks.	1. Phase II Environmental Site Assessment Report. 2. Remedial Action Plan. 3. Assets integrity program.	1. 60 days after as mobility restrictions due to the COVID-19 pandemic are lifted. 2. 180 days after as mobility restrictions due to the COVID-19 pandemic are lifted. 3. 60 days after as mobility restrictions due to the COVID-19 pandemic are lifted.
PS 4: Community Health, Safety, and Security			

No.	Action	Deliverable	Delivery date
4.1	Update, approve and implement the Community Health and Safety Management Plan (CHSMP) to avoid or minimize the potential community risks and impacts that may result from its activities, focusing on the vulnerable people of Cité Soleil.	<ol style="list-style-type: none"> 1. Updated CHSMP approved by the SMT (Senior Management Team). 2. Evidence of CHSMP implementation. 	<ol style="list-style-type: none"> 1. Before first disbursement. 2. Annually as part of the Project's ESCR.
4.2	As part of the CHSMP, undertake a risk assessment to prevent Project's incidents and accidents that will consider: i) water quality and availability; ii) community exposure to air, noise and water pollution; iii) design and safety of infrastructure and equipment; iv) traffic safety; v) handling, storage and transport of hazardous materials and waste; vi) community exposure to communicable and non-communicable diseases, as well as vector control; vii) security personnel; viii) emergency preparedness and response; and ix) potential public exposure to spills, fires, and explosions.	Community Risk assessment as part of the CHSMP.	180 days after first disbursement.
4.3	<ol style="list-style-type: none"> 1. Present a report of allegations of security personnel abuse. 2. Report unlawful acts to public authorities. 	<ol style="list-style-type: none"> 1. Report on allegations of security personnel abuse. 2. Report of unlawful acts. 	<ol style="list-style-type: none"> 1. Annually as part of the Project's ESCR. 2. Annually as part of the Project's ESCR.