

6 Environmental and Social Action Plan

Item no.	PRF reference	Action	Responsibility	Deliverable(s)	Deadline	Est. costs ^{*6}	Ref. to DD report
01	PS-1 Identification and assessment of risks and impacts	Receive the official approval of the EIS from ZEMA – Environmental Permit to proceed with the project	Ilute Solar Limited	Environmental Permit from ZEMA	Before financial close	Fee according to national legislation requirements	Section 3
02	PS-1 Identification and assessment of risks and impacts	Revisit the project definition of Area of Influence in terms of direct and direct impacts	Ilute Solar Limited	Updated Aol, Updated EIS	Before updated EIS disclosure and submission to the AfDB Board	Update of the EIS, estimate 3 days at 700 USD/DAY	Section 3
03	PS-1 Identification and assessment of risks and impacts	Revisit the EIS in terms of identification of impacts from associated facilities, e.g., the existing transformer station at Sesheke may be qualified as project associated facility	Ilute Solar Limited	Definition on project Associated Facilities, Updated EIS	Before updated EIS disclosure and submission to the AfDB Board	Update of the EIS, estimate 5 days at 700 USD/DAY	Section 3
04	PS-1 Environmental and social management system	Update the Environmental and Social Management System (ESMS) Manual based on the recommendations included in this report	Ilute Solar Limited	Updated ESMS Manual	ESMS Policy Statement to be disclosed together with updated EIS and submitted to the AfDB Board	Update of the ESMS, estimate 15 days at 700 USD/DAY	Section 3
05	PS-1 Organizational capacity and competency	Strengthen the ESHSS organization - Hire the CLO and ensure training relevant to the project	Ilute Solar Limited	ESHSS organization	ESMS Manual before start of construction Before financial close	Monthly salary in line with the local market requirements and company policies	Section 3

⁶ * Please insert an initial estimation, using manday fees and costs of materials averaged for the local market. The LESC will not hold accountable for the accuracy of these estimates, as they solely serve as an indication to assist the Borrower in planning

Project related

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		- Full deployment of ESG Manager and H&S Manager to this project					
06	PS-1 Organizational capacity and competency	Hire the ESHSS organization for construction phase of the project: - HSE Manager to be present on site	Ilute Solar Limited	ESHSS organization in place	Before start of construction	Monthly salary in line with the local market requirements and company policies	Section 3
07	PS-1 Stakeholder engagement / community support	Update the Stakeholder Engagement Plan in line with the recommendations in this report	Ilute Solar Limited	Update SEP	As minimum, update gaps to meet AfDB requirements before updated EIS disclosure and submission to the AfDB Board	Update of the SEP, estimate 10 days at 700 USD/DAY	Section 3
08	PS-1 External communications and grievance mechanisms	Establish and maintain the operational function of the Grievance Redress Mechanism	Ilute Solar Limited	GRM in place, operational and live	Before financial close	GRM in place, implementation as part of the CLO responsibility and function description	Section 3
09	PS-2 Working conditions and management of workers relationship (incl third party workers) & Safeguarding	All labour related documents to be aligned to recommendations in this report.	Ilute Solar Limited	Labour plan, policies and procedures in place but requiring updates. Labour accommodation management plan to be completed.	Before financial close	Update of the labour documentation, estimate 5 days at 700 USD/DAY	Section 3
10	PS-2 Supply chain working conditions & safeguarding	Conduct appraisals of suppliers Conduct Human rights risk assessment.	Ilute Solar Limited	Supplier Code of Conduct in place, appraisals required.	Before financial close	Appraisal of all suppliers, estimate 10 days 700 USD/DAY, HR risk assessment, estimate 10 days at 700 USD/DAY	Section 3

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11	PS-2 Working conditions and management of workers relationship (incl third party workers) & Safeguarding	Develop a labour Code of Conduct for staff that may be on/ off site at any given time	Ilute Solar Limited	Labour Code of Conduct	Before financial close	Develop labour Code of Conduct, estimate 15 days at 700 USD/DAY	Section 3
12	PS-3 Pollution prevention	Develop a provision for a wastewater treatment plant for construction phase of the project, if possible downscale it to the operation phase of the project	Ilute Solar Limited	Wastewater treatment facility in place and operational	Before financial close	Modular unit wastewater treatment plant, estimate range: 1.5-2mIn USD to meet IFC Indicative Values for Treated Sanitary Sewage Discharges, based on 200 people input, including: equipment, installation, laboratory testing and measurements, excluding utility connections	Section 3
	PS-3 Pollution prevention	Undertake Audit of the waste service providers that will be engaged in the project	Ilute Solar Limited	Audit completed	Before construction	Audit, estimate 5 days at 700 USD/DAY	Section 3
	PS-3 Pollution prevention	Further elaborate on the management of the labour camp, in terms of locations, utility connections, management and organisation	Ilute Solar Limited	Labour Camp details included in the updated EIS	Before financial close	Development of the Labour Camp Management Plan, estimate 10 days at 700 USD/DAY	Section 3
	PS-3 Pollution prevention	Undertake a visual inspection of site on areas potentially contaminated due to waste dumping, past human activities	Ilute Solar Limited	Inspection record on potential presence of contaminated soil	Before financial close	Visual inspection of the site for identification of potentially contaminated areas, estimate 5 days at 700 USD/DAY	Section 3

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						Soil sampling costs and laboratory analysis excluded	
	PS-4 Community Health & Safety	Identify the vulnerability and exposure of the access route to the south to pluvial flooding and potentially identify required mitigation measures. Incorporate the risk of wildfires into project design and potentially identify required mitigation measures (e.g., fire buffer zones). Consider increased temperature and increased precipitation in project design if components are deemed vulnerable to extreme heat and intense precipitation events	Ilute Solar Limited	Hydrological and hydraulic modelling of the access road	To be included in the updated EIS in terms of impact assessment and mitigation measures – before the updated EIS disclosure and submission to the AfDB Board	Update of the CCRA related studies and impact assessment, estimate 10 days at 700 USD/DAY	Section 3
	PS-4 Community Health & Safety	Further elaborate on the Community Health and Safety Management Plan (CHSMP) to cover traffic/ transport impacts, restriction of land access, implementation of the Labour Code of Conduct (LCoC) and implementation of the Project's Influx Management Plan (IMP)	Ilute Solar Limited	Update the existing CHSMP	Before financial close	Update of the CHSMP, estimate 5 days at 700 USD/DAY Implement LCoC and IMP – responsibility and function of Site management	Section 3
	PS-5 Economic displacement	Update LRP to align to extensive recommendations in this report. Ensure monitoring and reporting can be tracked.	Ilute Solar Limited	Updated LRP (with implementation)	Before the updated EIS disclosure and submission to the AfDB Board	Update of the LRP, estimate 25 days at 700 USD/DAY	Section 3
	PS-6 Biodiversity and living natural resources	Expand the fauna baseline information in terms of the species ecology, behavior, use of the proposed site	Ilute Solar Limited	Updated Fauna Baseline Information, updated EIS	Before the updated EIS disclosure and submission to the AfDB Board	Expand fauna baseline, estimate 10 days at 700 USD/DAY	Section 3

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	PS-6 Biodiversity and living natural resources	Confirm the scope of the pre-construction flora survey and the agreed compensation strategy, e.g., if mandatory under the national legislation (e.g., replanting quantities, areas, species to be replanted, monitoring obligations, etc.)	Ilute Solar Limited	Updated Fauna Baseline Information, updated EIS	Before the updated EIS disclosure and submission to the AfDB Board	Confirm scope of the pre-construction flora survey, estimate 5 days at 700 USD/DAY	Section 3
	PS-6 Biodiversity and living natural resources	Align the BMP efforts based on additional flora and fauna information, pre-construction survey, AfDB requirements for financing a project in a legally protected area	Ilute Solar Limited	Updated BMP	Before the updated EIS disclosure and submission to the AfDB Board	Update / align BMP, estimate 15 days at 700 USD/DAY	Section 3
	PS-6 Biodiversity and living natural resources	Update the EIS, relevant MPs on the co-use of the access road by elephants, fence design to allow small mammals using the site, identification and removal of alien invasive species	Ilute Solar Limited	Updated EIS	Before the updated EIS disclosure and submission to the AfDB Board	Update of the EIS, estimate 10 days at 700 USD/DAY	Section 3
	PS-6 Biodiversity and living natural resources	Ensure that the final design of the transmission line towers is bird friendly, meaning that larger birds (vultures) will not get electrocuted when perching on the towers.	Ilute Solar Limited	Updated EIS, final design of the transmission line	Before the updated EIS disclosure and submission to the AfDB Board	Update of the EIS, estimate 5 days at 700 USD/DAY	Section 3