

REPORT

Central Térmica de Temane Project - Work Camp Management Plan

Moz Power Invest, S.A. and Sasol New Energy Holdings (Pty) Ltd

Submitted to:

Ministry of Land, Environment and Rural Development (MITADER)

Submitted by:

Golder Associados Moçambique Limitada

6th Floor, Millenium Park Building, Vlademir Lenine Avenue No 174

Maputo, Moçambique

+27 11 254 4800

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EXECUTIVE SUMMARY

Introduction

This report presents the Workers Camp Management Plan (w-CMP) prepared as part of the Environmental and Social Impact Assessment (ESIA) process required for a proposed gas to power facility known as the Central Térmica de Temane (CTT) Project. The Proponent for this application is Moz Power Invest, S.A. (MPI), a company to be incorporated under the laws of Mozambique under a joint development agreement with Sasol New Energy Holdings (Pty) Ltd (SNE). Shareholding for MPI is comprised of Electricidade de Mozambique E.P. (EDM) and Temane Energy Consortium (Pty) Ltd (TEC).

This Plan describes the requirements and expectations in terms of compliance, reporting, roles, supervision with respect to the camp activities and accommodation. It covers all activities performed within the camp and it is applicable to all CTT project personnel and contractors with camp management responsibilities.

Objectives

The w-CMP aims to Promote healthy, safe, secure and comfortable accommodation that does not impact negatively on the communities in the surrounding area by establishing practical procedures for mitigating expected and significant negative impacts related to a construction workforce camp.

Legal Requirements

The w-CMP has been prepared in accordance with the following:

- Mozambique legislation; and
- International conventions and WBG / IFC performance standards and the World Bank Group EHS guidelines.

Roles and Responsibilities

The implementation of this plan requires consistent and committed resources from the Proponent and Contractor. As the needs of the Project change over time, some roles may be replaced by others that are more appropriate to the Project's needs at the time.

Conclusion

This document presents the Workers Camp Management Plan for the CTT project. It details the goals, objectives and targets timeframes for implementation and roles and responsibilities to achieve a compliant standard of camp management for the CTT project.

Ideally this plan should be reviewed every 5 years in order to ensure its continued suitability, adequacy and effectiveness.

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ACRONYMS

Acronym	Description
CCGT	Combined Cycle Gas Turbine
CPF	Central Processing Facility
CTT	Central Térmica de Temane
EC	Environmental Coordinator
EDM	Electricidade de Moçambique E.P. (Mozambique State Electricity Company)
EPCM	Engineering, Procurement, Construction Management
ESIA	Environmental and Social Impact Assessment
ESO	Environmental Site Office
GBV	Gender based violence
Ha	Hectares
HSSE	Health, Safety, Security and Environment
IFC	International Finance Corporation
INP	National Petroleum Institute
KV	Kilovolts
MICOA	Ministry of Environmental Affairs
MITADER	Ministry of Land, Environment and Rural Development
MW	Megawatt
OCGE	Open Cycle Gas Engines
PM	Project Manager
RSA	Republic of South Africa
SEA	Sexual Exploitation and Abuse
SEM	Senior Environmental Manager
SNE	Sasol New Energy Holdings
TB	Tuberculosis
VCT	Voluntary Counselling and Testing
w-CMP	Work Camp Management plan

GLOSSARY OF TERMS

Term	Description
Community Liaison Officer (CLO)	A person employed by CTT whose main purpose is liaison with authorities and the local communities regarding the activities and presence of CTT in the project area. As a minimum, the CLO is appointed for the construction period.
Environmental Coordinator (EC)	A permanent CTT employee with environmental experience, based in Mozambique, and responsible for the coordination of the environmental and social impact management of the project.
Environmental Site Officer (ESO)	This is a person with environmental training who is responsible for the day-to-day environmental management of construction activities.
Environmental Specialists	These are either CTT personnel or external specialists called in for specific environmental aspects as defined by the environmental coordinator.
Senior Environmental Manager (SEM)	A person permanent CTT employee who has management responsibility for the Environmental Coordinator and Environmental Site Officer.
Contractor	The organisation that is appointed to represent CTT and to manage the sub-contractors' activities.
Project Manager	A person who has the overall responsibility for managing and directing the project team to ensure that policies and procedures are adhered to.

1.0 PROJECT OVERVIEW

The Mozambican economy is one of the fastest growing economies on the African continent with electricity demand increasing by approximately 6-8% annually. In order to address the growing electricity demand faced by Mozambique and to improve power quality, grid stability and flexibility in the system, Moz Power Invest, S.A. (MPI), a company to be incorporated under the laws of Mozambique and Sasol New Energy Holdings (Pty) Ltd (SNE) in a joint development agreement is proposing the construction and operation of a gas to power facility, known as the Central Térmica de Temane (CTT) project. MPI's shareholding will be comprised of EDM and Temane Energy Consortium (Pty) Ltd (TEC). The joint development partners of MPI and SNE will hereafter be referred to as the Proponent. The Proponent propose to develop the CTT, a 450MW natural gas fired power plant.

The proposed CTT project will draw gas from the Sasol Exploration and Production International (SEPI) gas well field via the phase 1 development of the PSA License area, covering gas deposits in the Temane and Pande well fields in the Inhassoro District and the existing Central Processing Facility (CPF). Consequently, the CTT site is in close proximity to the CPF. The preferred location for the CTT is approximately 500 m south of the CPF. The CPF, and the proposed site of the CTT project, is located in the Temane/Mangugumete area, Inhassoro District, Inhambane Province, Mozambique; and approximately 40 km northwest of the town of Vilanculos. The Govuro River lies 8 km east of the proposed CTT site. The estimated footprint of the CTT power plant is approximately 20 ha (see Figure 1).

Associated infrastructure and facilities for the CTT project will include:

- 1) Electricity transmission line (400 kV) and servitude; from the proposed power plant to the proposed Vilanculos substation over a total length of 25 km running generally south to a future Vilanculos substation. [Note: the development of the substation falls outside the battery limits of the project scope as it is part of independent infrastructure authorised separately (although separately authorised, the transmission line will be covered by the Project ESMP, and the Vilanculos substation is covered under the Temane Transmission Project (TTP) Environmental and Social Management Plans). Environmental authorisation for this substation was obtained under the STE/CESUL project. (MICOA Ref: 75/MICOA/12 of 22nd May 2012)];
- 2) Piped water from one or more borehole(s) located either on site at the power plant or from a borehole located on the eastern bank of the Govuro River (this option will require a water pipeline approximately 11km in length);
- 3) Access road; over a total length of 3 km, which will follow the proposed water pipeline to the northeast of the CTT to connect to the existing Temane CPF access road;
- 4) Gas pipeline and servitude; over a total length of 2 km, which will start from the CPF high pressure compressor and run south on the western side of the CPF to connect to the power plant;
- 5) Additional nominal widening of the servitude for vehicle turning points at points to be identified along these linear servitudes;
- 6) A construction camp and contractor laydown areas will be established adjacent to the CTT power plant footprint; and
- 7) Transshipment and barging of equipment to a temporary beach landing site and associated logistics camp and laydown area for the purposes of safe handling and delivery of large oversized and heavy equipment and infrastructure to build the CTT. The transshipment consists of a vessel anchoring for only approximately 1-2 days with periods of up to 3-4 months between shipments over a maximum 15-month period early in the construction phase, in order to offload heavy materials to a barge for beach landing. There are 3 beach landing site options, namely SETA, Maritima and Briza Mar (Figure 7). The SETA site is considered to be

the preferred beach landing site (construction phase only) for environmental and other reasons; it therefore shall be selected unless it is found to be not feasible for any reason;

- 8) Temporary bridges and access roads or upgrading and reinforcement of existing bridges and roads across sections of the Govuro River where existing bridges are not able to bear the weight of the equipment loads that need to be transported from the beach landing site to the CTT site. Some new sections of road may need to be developed where existing roads are inaccessible or inadequate to allow for the safe transport of equipment to the CTT site. The northern transport route via R241 and EN1 is considered as the preferred transport route (Figure 8) (construction phase only) on terrestrial impacts; however, until the final anchor point is selected, and the barge route confirmed, the marine factors may still have an impact on which is deemed the overall preferable route.

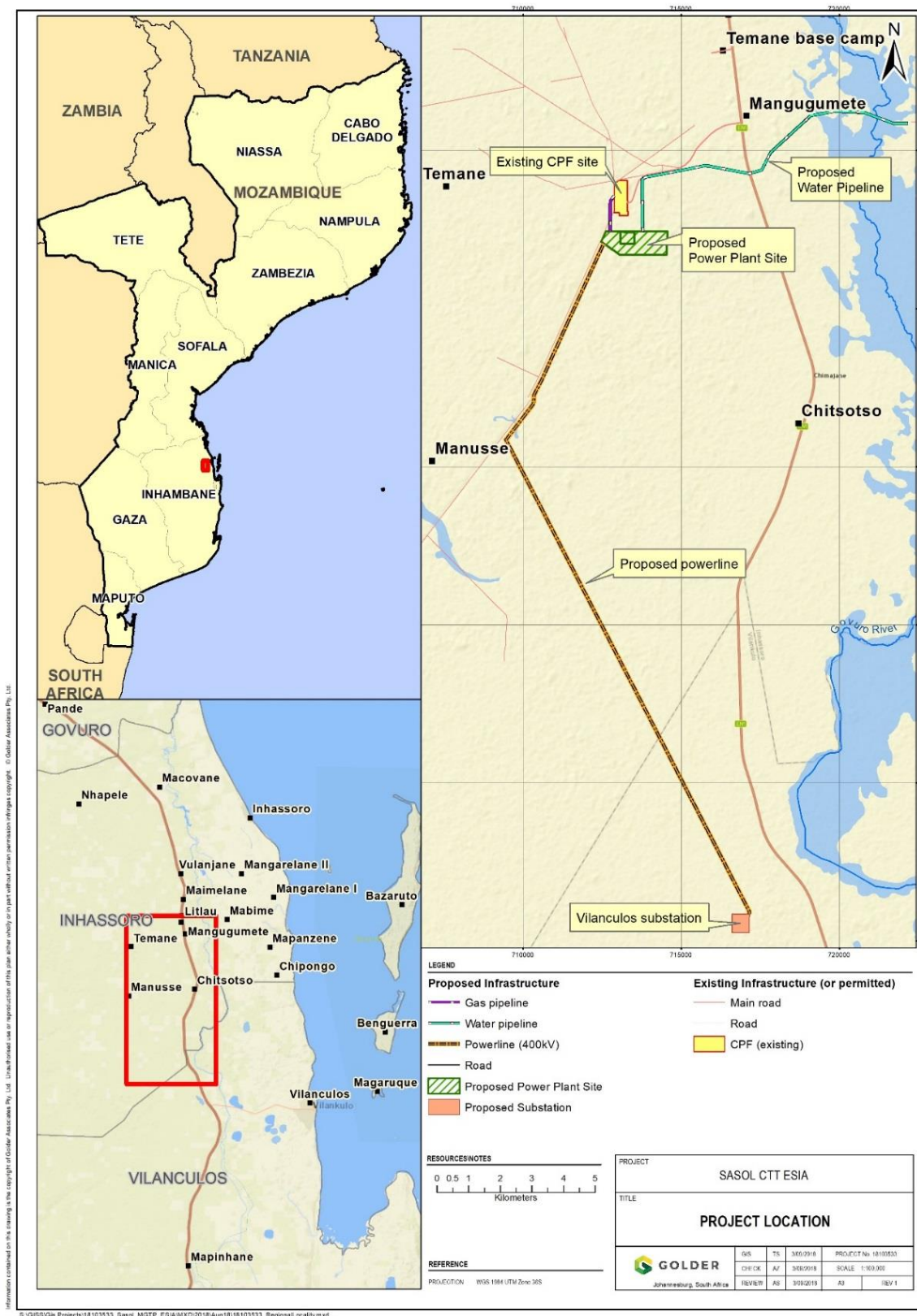


Figure 1: Project Location

1.1 Purpose and objectives of this Document

This document is the Work Camp Management Plan (w-CMP) for the CTT Project.

The w-CMP presented here has the specific objectives of establishing practical procedures for mitigating expected and significant negative impacts related to a construction workforce camp (“work camp”). It aims to Promote healthy, safe, secure and comfortable accommodation that does not impact negatively on the communities in the surrounding area.

The w-CMP contains environmental and social management requirements for all activities related to the work camp. It documents the actions, approaches and measures required to manage, mitigate and monitor environmental risks associated with the installation of a camp.

1.2 Scope

This w-CMP covers activities at the work camp on the CTT Project. This document will be revised as necessary to reflect changes in the activities and management practices. It provides the delivery instrument used to manage camp related environmental and social impacts. It is structured based upon the recognised international standards and is informed by the International Finance Corporation (IFC) Performance Standards 1, 2 and 4 (PS1, PS2 and PS4).

1.3 Intended users

This w-CMP is meant to be utilised by CTT project personnel and contractors with camp management responsibilities.

2.0 LEGAL FRAMEWORK

The Proponent is committed to complying with the national Mozambican legislation and international best practices and will comply with the more stringent industry guideline of the two aforementioned. Additionally, an Environmental and Social Policy will be formulated, all visitors, contractors and employees will be required to comply with the requirements of the policy. The policy is yet to be formulated by CTT and will be fit for purpose. All policies will be in place prior to commencement of any activities.

The Mozambican regulatory framework establishes distinct requirements and standards for the implementation of environmental and social management of infrastructure developments such as the construction phase of the project, where the work camp is relevant.

2.1.1 Mozambican Regulations

Environmental Law (Decree 20/1997 of 1 October) - The Environment Law defines a number of fundamental environmental management concepts and principles, establishing the basic institutional framework for environmental protection; establishing a general norm which prohibits all activities that cause environmental damage exceeding legally defined limits (pollution in particular); stipulating special norms to protect the environment (protecting biodiversity in particular); providing for a set of environmental management instruments (the environment license, the environmental impact assessment process and the environmental audit); and describing the system inspection, offences and penalties for non-compliance.

Regulations on Environmental Quality and Emission Standards (Decree 18/2004 of 2 June), as amended by Decree 67/2010 of 31 December - The Regulations are in terms of Article 10 of the Environment Law, and are concerned with environmental quality standards for air, water and soil. Regarding air, the Regulations establish standards for emission limits related to specified industrial processes and for ambient air quality. Regarding water, the Regulations specify compliance requirements for industrial liquid effluent that is discharged into the environment. Standards for different industries are set out, including domestic discharges (understood to mean discharges from sewage treatment works) and discharges from the petrochemical industry. The location of an emission from any source must be determined during the environmental licensing process so as to ensure that there is no change in the quality of the water in the receiving body, preventing the use of its water for other purposes.

Regulations on Urban Solid Waste Management (Decree 94/2014 of 31 December) - It applies to all natural and legal, public and private persons involved in the production and management of solid urban waste and the production and management of industrial and medical waste.

The Decree in its Article 8 and Annex I (Waste Management Plan), mandates all the public or private entities that perform waste management activities, to develop and implement a waste management plan. The integrated management plans of municipal solid waste are valid for a period of five (5) years from the date of approval by the Municipal Assemblies or Governments.

Regulation on Hazardous Waste Management (Decree 83/2014 of 31 December) - This Decree approves the Regulation on Hazardous Waste Management and aims at establishing general rules related to waste disposal, including: the establishment of rules for the production and management of hazardous waste in the country and applies to all natural and legal, public and private persons involved in hazardous waste management or import, distribution and sale of expired used or new tires.

Labour Law nº 23/2007 of 1 August - This law defines the general principles and establishes the legal regime applicable to individual and collective relationships of subordinate work, provided for others and for remuneration, i.e., defines aspects related to the hiring of workers, the rights and responsibilities of workers, including hygiene and health and safety. The law also discusses the labour relations between employers and workers and the laws in terms of national and foreign workers.

2.1.2 International Guidelines and Standards

The IFC, a division of the World Bank Group that lends to private investors, uses a Sustainability Framework (IFC, 2012), to promote sound environmental and social practices, encourage transparency and accountability, and contribute to positive development impacts. The Proponent is committed to upholding the requirements of the IFC Sustainability Framework.

IFC Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts - establishes the importance of integrated assessment to identify the social and environmental impacts, risks and opportunities of projects; effective community engagement through disclosure of project related information and consultation with local communities on matters that directly affect them and the management of social and environmental performance throughout the life of a project through effective Environmental and Social Management System (ESMS) **IFC Performance Standard 2: Labour and Working Conditions** - recognises that employment should be accompanied by the protection of the fundamental rights of workers. IFC Performance Standard 2 (PS2) aims to promote “safe and healthy working conditions, and to protect and promote the health of workers.”

IFC Performance Standard 4: Community Health, Safety, and Security- Introduces requirements for construction workers’ accommodation and seeks to ensure that safeguarding of personnel and property is carried out consistently with relevant human rights principles

OP/BP 4.01 and OP/BP 4.03: Environmental Assessment/Environmental Performance standards - The objective of this policy is to ensure that projects funded by the World Bank are environmentally and socially healthy and sustainable and that decision making is improved through an adequate analysis of actions and their possible environmental and social risks and impacts on the natural environment; safety and human health; physical and cultural resources.

3.0 PROJECT DESCRIPTION

The CTT project will produce electricity from natural gas in a power plant located 500m south of the CPF. The project will consist of the construction and operation of the following main components:

- Gas to Power Plant with generation capacity of 450MW;
- Gas pipeline (± 2 km) that will feed the Power Plant with natural gas from the CPF;
- 400kV Electrical transmission line (± 25 km) with a servitude that will include a fire break (vegetation control) and a maintenance road to the Vilanculos substation. The transmission line will have a partial protection zone (PPZ) of 100m width. The transmission line servitude will fall inside the PPZ;
- Water supply pipeline to one or more borehole(s) located either on site or at borehole(s) located east of the Govuro River;
- Surfaced access road to the CTT site and gravel maintenance roads within the transmission line and pipeline servitudes;
- Temporary beach landing structures at Inhassoro for the purposes of delivery of equipment and infrastructure to build the power plant. This will include transshipment and barging activities to bring equipment to the beach landing site for approximately 1-2 days with up to 3-4 months between shipments over a period of approximately 8-15 months;
- Construction camp and contractor laydown areas adjacent to the CTT power plant site; and
- Temporary bridge structures across Govuro River and tributaries, as well possible new roads and/or road upgrades to allow equipment to be safely transported to site during construction.



Figure 2: Examples of gas to power plant sites (source: www.industcards.com and www.wartsila.com)

The final selection of technology that will form part of the power generation component of the CTT project has not been determined at this stage. The two power generation technology options that are currently being evaluated are:

- Combined Cycle Gas Turbine (CCGT); and
- Open Cycle Gas Engines (OCGE).

Please refer to Chapter 4 of the main ESIA document for further details on the technology option.

At this early stage in the project a provisional layout of infrastructure footprints, including the proposed linear alignments is indicated in Figure 1 A conceptual layout of the CTT plant site is shown below in Figure 3.

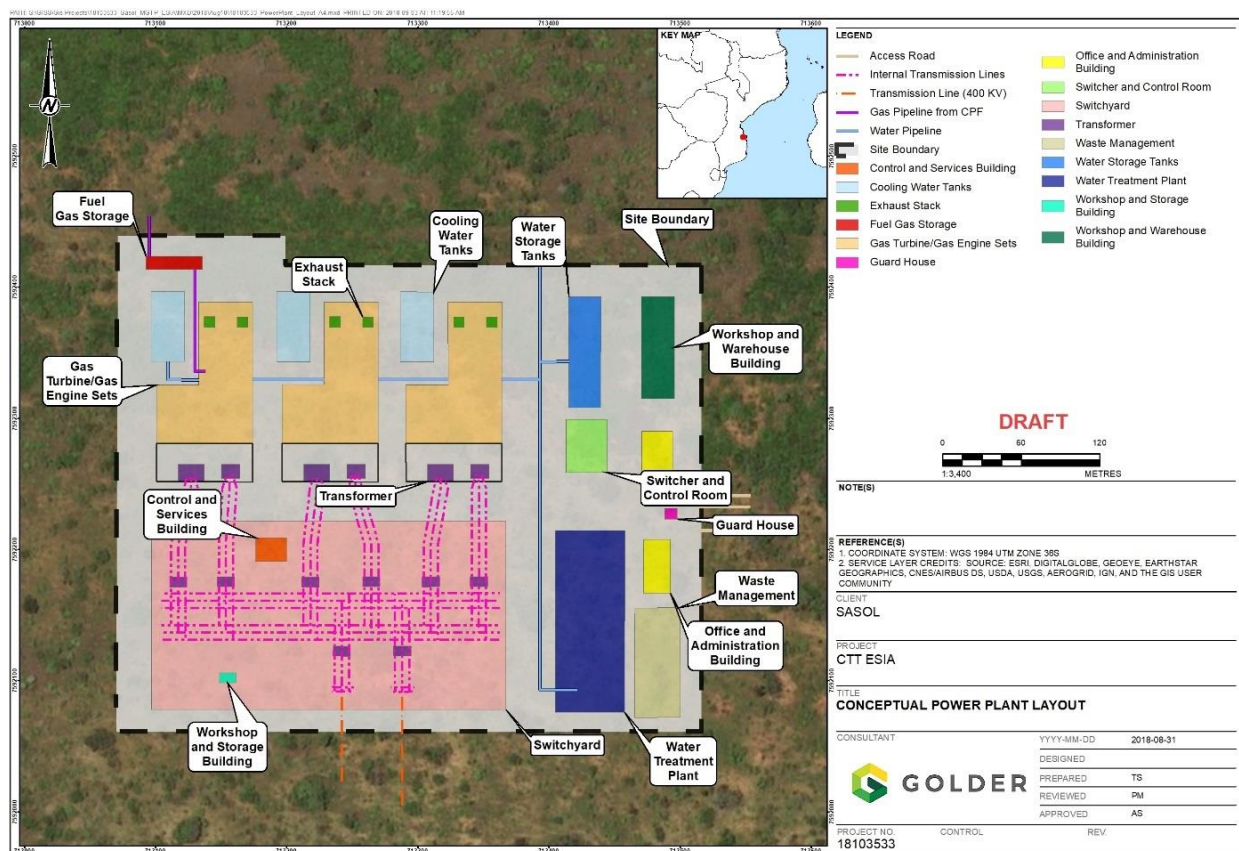


Figure 3: Conceptual layout of CTT plant site

3.1 Ancillary Infrastructure

The CTT project will also include the following infrastructure:

- Maintenance facilities, admin building and other buildings;
- Telecommunications and security;
- Waste (solid and effluent) treatment and/or handling and disposal by third party;
- Site preparation, civil works and infrastructure development for the complete plant;
- Construction camp (including housing/accommodation for construction workers); and
- Beach landing laydown area and logistics camp.

The heavy equipment and pre-fabricated components of the power plant will be brought in by ship and transferred by barge and landed on the beach near Inhassoro. The equipment and components will be brought to site by special heavy vehicles capable of handling abnormally heavy and large dimension loads. Figure 4, Figure 5 and Figure 6 show examples of the activities involved with a temporary beach landing site, offloading and transporting of large heavy equipment by road to site.

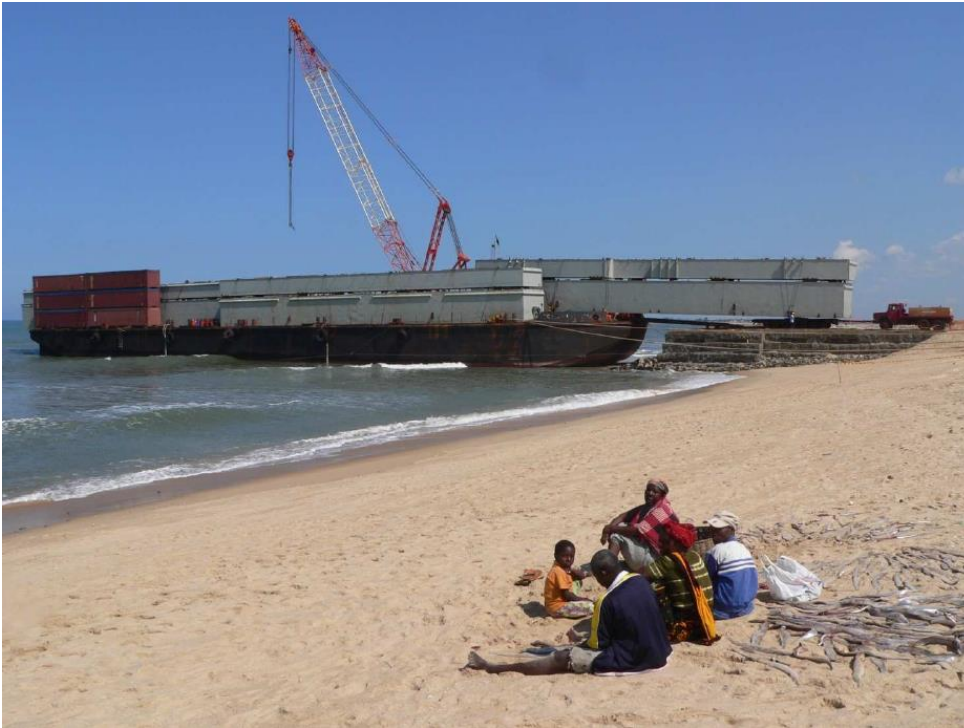


Figure 4: Typical beach landing site with barge offloading heavy equipment (source: Comarco)



Figure 5: Example of large equipment being offloaded from a barge. Note the levels of the ramp, the barge and the jetty (source: SUBTECH)



Figure 6: Heavy haulage truck with 16-axle hydraulic trailer transporting a 360 ton generator (source: ALE)

3.2 Water and electricity consumption

The type, origin and quantity of water and energy consumption are still to be determined based on the selected technology to construct and operate the CTT plant. At this stage it is known that water will be sourced from existing boreholes located on site or east of the Govuro River for either of the technology options below:

- Gas Engine: $\pm 12 \text{ m}^3/\text{day}$; or
- Gas Turbine (Dry-Cooling): $\pm 120 - 240 \text{ m}^3/\text{day}$.

3.3 Temporary Beach Landing Site and Transportation Route Alternative

As part of the CTT construction phase it was considered that large heavy equipment and materials would need to be brought in by a ship which would remain anchored at sea off the coast of Inhassoro. Equipment and materials would be transferred to a barge capable of moving on the high tide into very shallow water adjacent to the beach to discharge its cargo onto a temporary off-loading jetty (typically containers filled with sand) near the town of Inhassoro. As the tide changes, the barge rests on the beach and off-loading of the equipment commences.

Currently, the SETA beach landing site is the preferred beach landing site together with the road route option to be used in transporting equipment and materials along the R241 then the EN1 then via the existing CPF access road to the CTT site near the CPF Figure 7 and Figure 8. indicate the beach landing site and route transportation option. The alternative beach landing sites of Maritima and Briza Mar are still being evaluated as potential options, as well as the southern transport route, which would also require road upgrades and a temporary bridge construction across the Govuro at the position of the existing pipe bridge. As part of the transportation route, the Govuro River bridge may need to be upgraded / strengthened to accommodate the abnormal vehicle loads. Alternatively, a temporary bypass bridge will be constructed adjacent to the existing bridge.

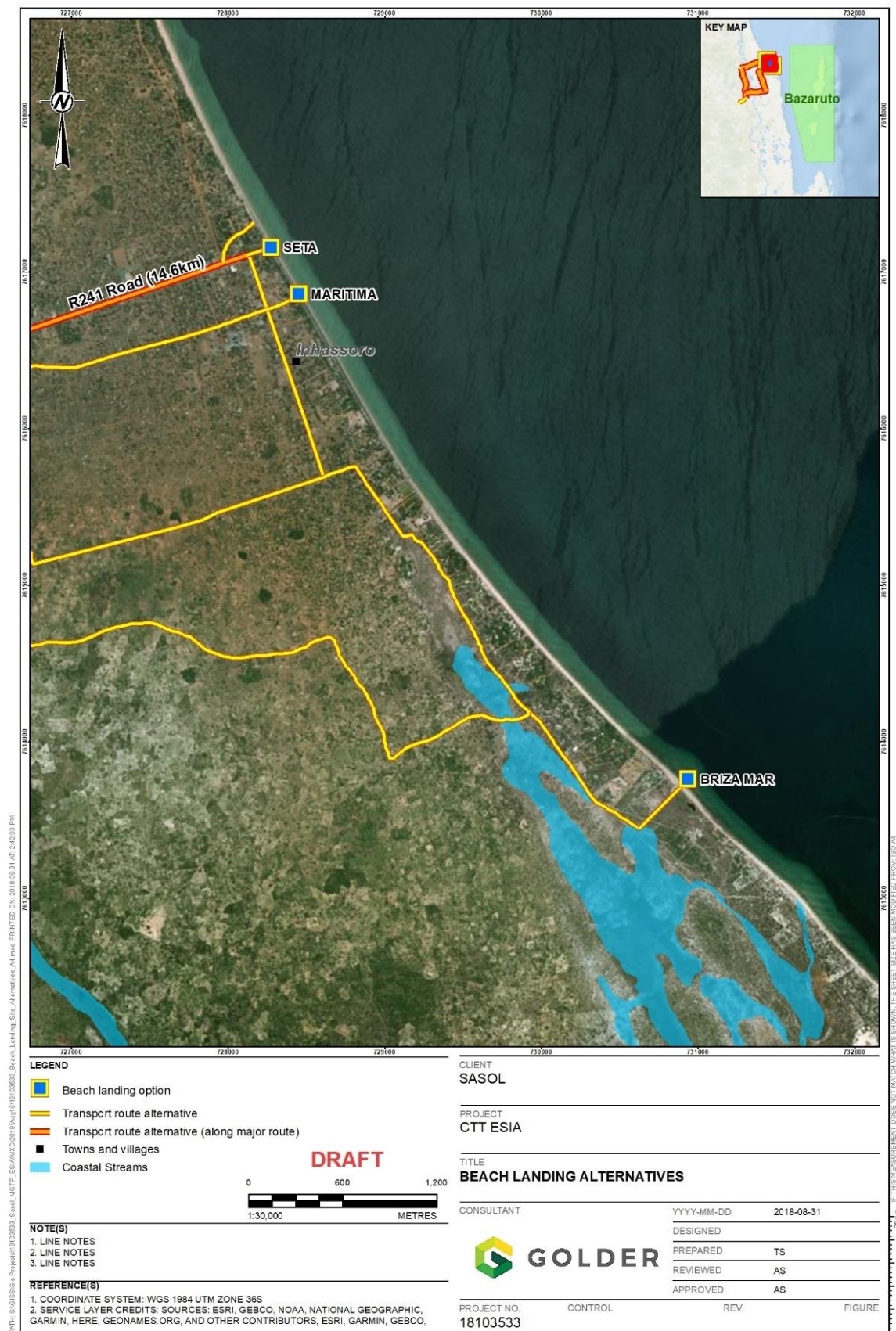


Figure 7: The three beach landing site options and route options at Inhassoro

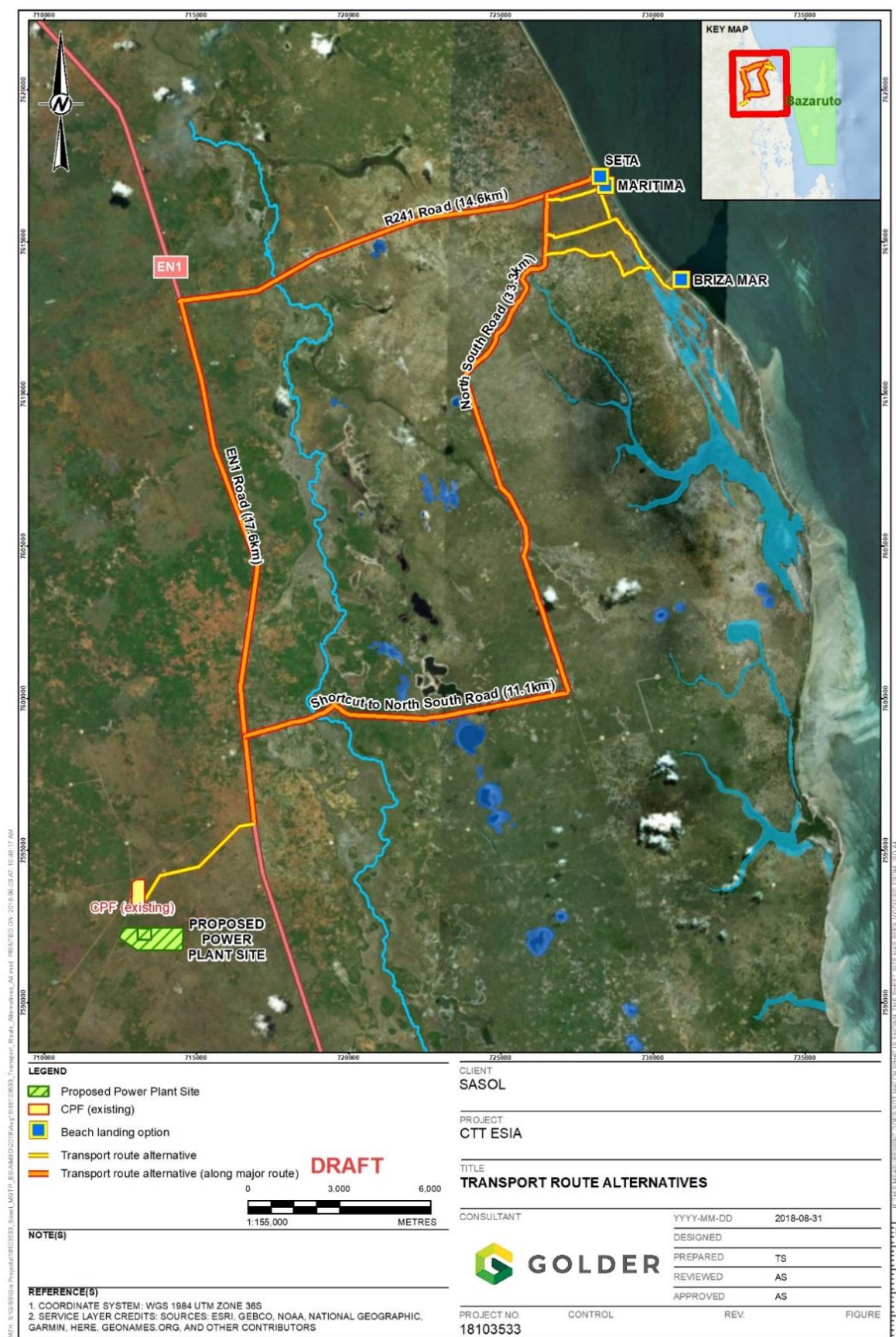


Figure 8: The two main transportation route alternatives from the beach landing sites to the CTT site

4.0 IMPLEMENTATION

4.1 Work Camp management structure

The overall organisational structure for the management of the w-CMP identifies and defines the responsibilities and authority of the various organisations and individuals involved in the implementation and review of this plan. Primary responsibility for management and implementation of this w-CMP rests with the contractor, who will be supported by the health, safety, security and environmental officers.

The structure of the Project and associated personnel should be sufficient to ensure the required social and environmental performance standards.

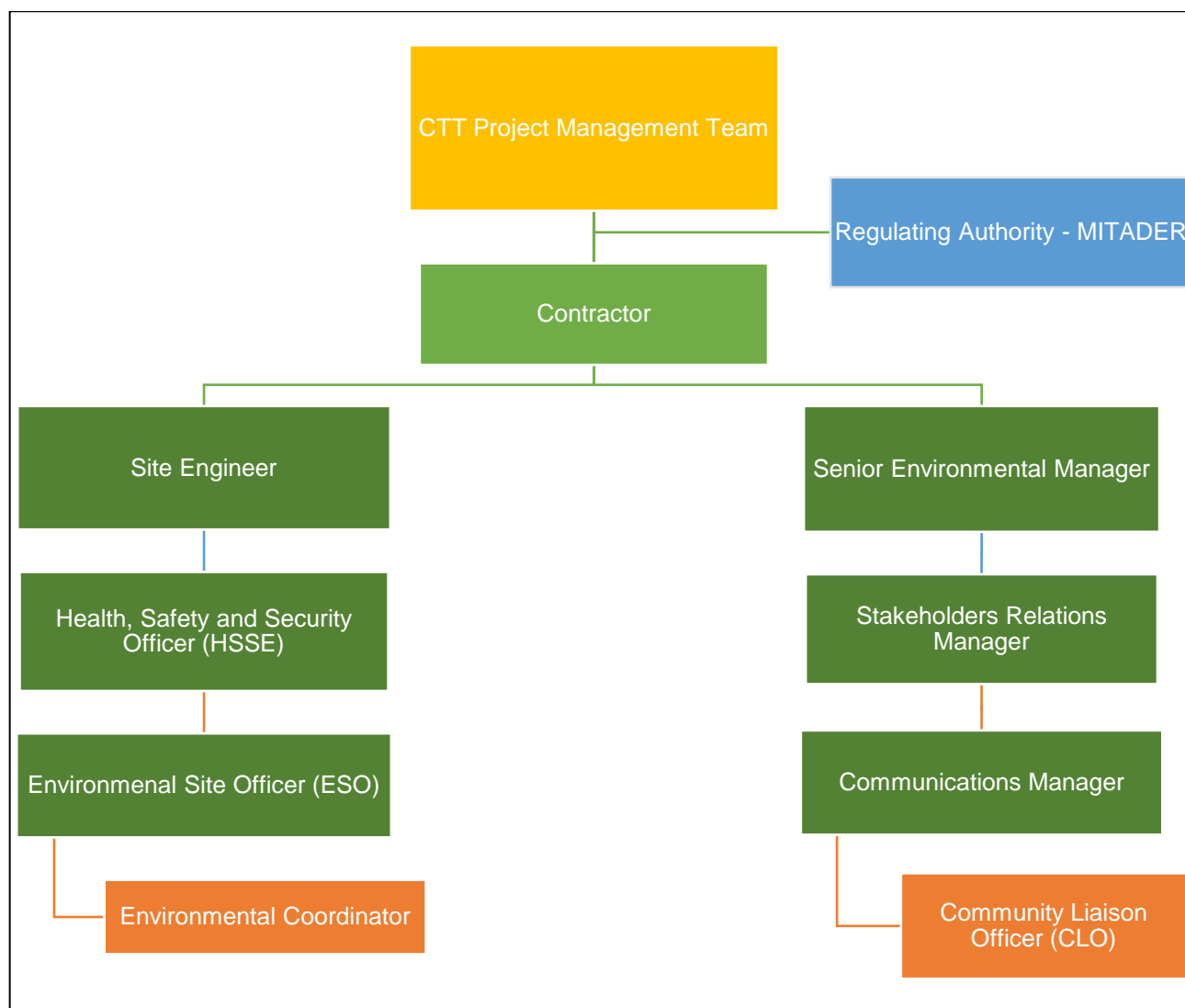


Figure 9: Camp management structure

4.2 Resources, roles and responsibilities

The principal responsibilities of each key party within this structure will be as follows:

Position Title	Role and Responsibilities
All parties	<p>All parties shall comply with all the requirements of w-CMP and shall, in accordance with accepted standards of the international energy industry and the World Bank, employ such up to date techniques, practices and methods that will ensure compliance to the requirements and, in general, minimise environmental damage, control waste, avoid pollution, prevent loss or damage to natural resources and minimise effects on surrounding landowners, occupants and the public.</p> <p>All parties shall prevent or minimise the occurrence of accidents which may cause damage to the environment, prevent or minimise the effects of such accidents and shall return the environment to a state as close to the condition existing prior to any such accident as possible.</p> <p>All parties shall take proactive steps to ensure that the requirements in the w-CMP are met during construction.</p> <p>All parties should adhere to a respectful relation with for local residents/communities.</p>
Regulating Authority (MITADER)	MITADER is the authority responsible for coordinating all environmental activities at the national level and for this reason it should be the main driver for the implementation of environmental and social sustainability in all projects. This entity has the responsibility of establishing acceptable standards for the various environmental indicators through applicable legislation; and shall evaluate and jointly monitor the measures and actions proposed in the w-CMP in order to prepare environmental audits as soon as appropriate management deems necessary.
Project Manager (PM)	The Project Manager's responsibility is to ensure that sufficient resources are allocated and budgeted for, for the implementation of this w-CMP. The Project Manager shall monitor the implementation of the w-CMP and remind the project personnel of their responsibilities within this Plan. The PM shall ensure that project operations are executed in a manner that does not cause harm to the environment or to people and surrounding communities and that a consistent approach is adopted by all employees and Contractors in regards sound environmental and social stewardship.
Contractor	The Proponent's representative, responsible for engineering, procurement and construction management of the camp. Construction management includes all social and environmental management. The Contractor shall ensure that the Construction sub-contractors employ such up to date techniques, practices and methods of construction that comply with this standard and, in general, minimise environmental and social damage, control waste, avoid pollution, prevent loss or damage to natural resources and minimise effects on surrounding landowners, occupants and the public.
Site Engineer	The Contractor's representative on site. Environmental staff (CLOs and ESOs) shall report directly to the Site Engineer. Referred to as 'the Engineer'.
HSSE Manager	The HSSE Manager is responsible for providing overall governance for HSSE matters relating to CTT operations, including the management of resources such as the ESO by providing guidance and support and monitoring progress against the established work

	<p>plans to meet defined environmental targets and objectives. He/she is specifically responsible for the following:</p> <ul style="list-style-type: none"> ■ Ensuring compliance with the approved w-CMP; ■ Ensuring that the ISO 14001 standard requirements are in place; ■ Ensure that the environmental parameters are monitored as per the w-CMP requirements; ■ Ensuring accurate and timeous reporting on environmental performance, analysing trends and ensuring that measures are in place to address deviations; ■ Ensuring that all environmental incidents are reported and investigated and that measures are in place to prevent recurrence; ■ Chairing the environmental task team meetings and ensuring that actions are allocated to responsible persons and that close-out is monitored in the Proponents internal system; ■ Ensuring that a regular meeting platform is created where environmental performance is discussed at workers and management level; ■ Ensuring that the environmental audit and inspection programme is carried out; and ■ Ensuring that the independent environmental monitoring activities are regularly conducted, the reports analysed, and measures put in place to address trends.
Senior Environmental Manager (SEM)	<p>The Senior Environmental Manager shall define the roles and authorities of staff members (and any specialist consultants) responsible for implementation of the various environmental facets of this w-CMP. The SEM shall:</p> <ul style="list-style-type: none"> ■ Address training needs of staff required to implement aspects of the w-CMP and maintain records of plans, decisions, data collected, communications made, emergency responses, etc., which document the implementation of the w-CMP; ■ Incorporate environmental aspects and management interventions applicable to outsourced tasks into contracts and performance appraisals to improve environmental awareness and performance and specify penalties for non-compliance; and ■ Report all environmental incidents as specified in the Company Procedures.
Environmental Site Officer	<p>The Contractor shall appoint an Environmental Site Officer (ESO), who will be employed on a full-time basis for the duration of the contract. The ESO shall perform all tasks necessary to monitor the performance of the contractor with respect to the specifications in the w-CMP. Specific responsibilities of the ESO shall be as follows:</p> <ul style="list-style-type: none"> ■ Ensure the protection of the environment; ■ Perform all day-to-day tasks necessary to monitor the performance of the contractor(s) with regard to the requirements of the w-CMP; ■ Thoroughly familiarise him/herself with existing information regarding the project area and the w-CMP;

	<ul style="list-style-type: none"> ■ To liaise with the CTT Project Manager in the case of incidents, non-compliance or any matter where the course of action is unclear; and ■ Verify the accuracy of the information contained in the w-CMP and to bring any errors, omissions, oversights to the attention of contractors and CTT management as necessary. <p>The ESO will act as a guide and adviser to contractors in respect to the w-CMP on environmental issues during the construction phase of the project. This will be achieved by ongoing internal inspections / auditing / monitoring of the project; identification of problem areas and provision of actions plans to avoid environmental damage.</p> <p>The ESO shall have experience in environmental management. He / She shall be capable of evaluating the effectiveness of specified management measures and be familiar with environmental management techniques. He / she shall be able to propose solutions to problems identified as regards the implementation of the plans.</p>
Environmental Coordinator (EC)	<p>The Environmental Coordinator shall be responsible for overseeing the development and implementation of environmental programmes. The EC will also conduct environmental training for camp staff and workers; facilitate workshops and support the ESO and SEM as needed.</p>
Community Liaison Officer (CLO)	<p>The Contractor shall appoint at least two CLO's during construction, reporting to the CTT Communications Manager. The CLOs shall comply with all requirements for ongoing communication with affected communities during the construction period. Responsibilities of the CLOs shall be set by CTT and may include the following:</p> <ul style="list-style-type: none"> ■ Support the CTT Communication Manager in meeting the regular communication requirements of the w-CMP; ■ To keep communities informed about upcoming construction activities and progress with construction; ■ To arrange occasional visits to construction sites for District Government, community leaders and other senior community leaders; ■ To teach traffic safety to those communities near or on access routes that will be used by construction vehicles and vehicles transporting heavy and large dimension loads from the beach landing at Inhassoro; ■ To communicate and manage the Compliments and Complaints Register ■ To communicate and manage the Grievance Procedure (as per the Grievance Redress Mechanism (GRM) and Stakeholder Engagement Plan (SEP) documents; and ■ To report any transgressions of construction workers or contractors in the communities to CTT management. <p>The CLOs shall act as guides and advisers to contractors in respect of the w-CMP on communication and local community issues during the construction phase of the project. This will be achieved by ongoing liaison with and monitoring of relations with communities, identification of problem areas and supporting their resolution.</p>

	The CLOs shall be hired from the Inhassoro District, shall have knowledge of the proposed project, experience in communication with communities and local and district authorities and shall be able to communicate in local languages. They shall be capable of evaluating the effectiveness of specified social management measures. They shall be able to propose solutions to problems identified as regards the implementation of the plans.
Communication Manager	The Communication Manager's responsibility is to design and manage the effective information dissemination and constructive engagement with district Government and community leaders and members in the CTT zone of influence.
Stakeholder Relations Manager	<p>The Stakeholder Relations Manager shall:</p> <ul style="list-style-type: none"> ■ Develop and propose strategies for relationships with local communities that allow the sustainable implementation of the project and develop engagement models to support the implementation of the stakeholder strategy; ■ Identify existing barriers to the effective engagement of key stakeholders and liaise with the Communication Manager to develop communication and engagement initiatives that enable increased stakeholder satisfaction. ■ Ensure permanent and effective communication with local communities, through articulation with their (traditional and elected) community leaders and the management of the complaints system, in order to reconcile interests and minimize potential conflicts.

5.0 MANAGEMENT AND MONITORING ACTIONS

Table 1 presents a summary of the potential impacts related to camp activities, together with mitigation and management measures to avoid or reduce these impacts, and the monitoring required to assess the performance of these measures.

The contractor is responsible for developing camp-specific procedures for the monitoring programme (where necessary) based upon the final design details of the infrastructure.

Table 1: Management and Monitoring of potential impacts

Source of Impact	Potential Impact	Mitigation and Management	Monitoring	Monitoring Frequency	Responsibility
Project presence	STIs, HIV/AIDS, related diseases Work camp personnel will provide opportunities for increases in STIs, HIV/AIDs.	The contractor shall implement, monitor and verify strict camp security procedures (closed camps from external visitors).	Verification	Ongoing	Contractor
		The contractor shall encourage and support workers to seek early diagnosis, counselling and treatment for all curable non-viral STIs in project workers; refer viral STIs (HIV and herpes) to VCT centre. The contractor shall include a non-discriminatory workplace policy on HIV, that outlines worker's and company's rights and responsibilities at the workplace and encourage behaviour change.	Outcome indicators – numerical tracking	Ongoing with quarterly statistics	Contractor
		The contractor shall conduct worker education programmes for STI – HIV/AIDS prevention through workshops, posters and informal information sessions.	Process Training sessions held; knowledge measurements	Ongoing with quarterly statistics	Contractor
		The contractor shall implement voluntary counselling on site and referral testing for HIV.	Outcome indicators – numerical tracking	Ongoing with quarterly statistics	Contractor

Source of Impact	Potential Impact	Mitigation and Management	Monitoring	Monitoring Frequency	Responsibility
		Guarantee free distribution of condoms, in places of easy access for workers.	Outcome indicators – numerical tracking Process Training sessions held; knowledge measurements	Ongoing with quarterly statistics	Contractor
		In close coordination with the health authorities at the health centres close to the project area, carry out periodic awareness campaigns on STIs and HIV / AIDS throughout the area of influence of the project, targeting the local communities, with special attention to women of various age groups.	Process Training sessions held; knowledge measurements	Ongoing with quarterly statistics	Contractor

Source of Impact	Potential Impact	Mitigation and Management	Monitoring	Monitoring Frequency	Responsibility
Vector related diseases (malaria)	<p>Project construction activities</p> <p>Potential to create vector breeding sites within work zones.</p> <p>Opening of roadways facilitating movement of infected individuals into the area; endemic in the coastal areas and uncertain levels in the Highlands.</p>	<p>The contractor shall implement a programme to minimise the incidence of malaria with the assistance of a person experienced in vector control (camp doctor and local health practitioner). The programme will include but not be restricted to:</p> <ul style="list-style-type: none"> ■ Conduct surface water management and drainage to prevent breeding site development; ■ Container management; ■ Education with respect to malarial prevention and the installation of protective measures in sleeping and eating areas (use of bed nets and repellents); and ■ Measures to determine and effectively treat malarial infection as quickly as possible after the contraction of the disease. 	Outcome; larval surveys	Ongoing with quarterly statistical reporting	Contractor
	Inside the work zone vector control activities.				

Source of Impact	Potential Impact	Mitigation and Management	Monitoring	Monitoring Frequency	Responsibility
Health services infrastructure, capacity	Hiring practices Perception of inequity in hiring practices based on existing health conditions can trigger community unrest.	The contractor shall implement the project specifications for performance of fitness for duty exams.	Process; Results of fitness for duty exams	Quarterly statistical reporting	Contractor
	Fitness for duty exams and fitness for duty medical requirements have consequences for follow up and treatment that cannot be delivered locally, e.g., tuberculosis.	The contractor shall recommend a service provider for follow up treatment for viral STIs and TB.	Process; the number of referrals for follow up treatment	Quarterly	Contractor
Camp location	Siting of camps may result in the displacement of residents, loss of productive lands and the resources upon these lands. Camps may also restrict or impede access to areas for the local community.	Potential camp locations will be selected in consultation with the Proponent and affected communities will be subsequently consulted. Necessary permits will be obtained from the relevant local government organisations for the approved camp location where relevant.	Verification	Prior to establishing the camp	Contractor and/or Proponent

Source of Impact	Potential Impact	Mitigation and Management	Monitoring	Monitoring Frequency	Responsibility
	Construction camps may result in a noticeable increase in traffic, noise, air emissions and light intrusion which could negatively affect the amenity and lifestyle of nearby communities and pose a potential safety issue.	<p>The project shall refer to those Environmental Management Plan's that include mitigation/avoidance measures that relate to the local community, including:</p> <ul style="list-style-type: none"> ■ Noise and Air impact management; and ■ Waste Management Plan. <p>The contractors shall comply with the World Bank noise guidelines, emission standards for air and pollution standards for light. Noise levels shall be controlled to ensure no detrimental effect to landowners, occupants, workers or the public.</p>	Verification	Ongoing	Contractor and/or Proponent

Source of Impact	Potential Impact	Mitigation and Management	Monitoring	Monitoring Frequency	Responsibility
Camp housing facilities	Respiratory, Housing (increased transmission of respiratory diseases) Mozambican nationals who reside in work camps and travel home during off times could potentially transmit respiratory infections from the project to their home community. Workers returning to the camp site on rotation could transmit illnesses obtained from their home environment.	<ul style="list-style-type: none"> ■ The contractor shall implement TB prevention and control programme with medical evaluation of TB status before assignment. ■ Effective camp facilities management at accommodation camps to prevent overcrowding etc (adherence to best practice housing conditions for construction camps etc). 	Outcome; pre-placement and workplace TB assessment	Ongoing; quarterly statistical reporting	Contractor

	<ul style="list-style-type: none"> ■ Pollution of surface and ground water sources through ineffective management of waste-water and solid waste. ■ Creation of vector breeding sites through inadequate environmental controls with increased risk of malaria and arbo-viral disease. ■ Lack of entertainment facilities, codes of conduct and controlled access in camp leading to the development of casual or transactional sexual relations in camps or communities- as per above. ■ Potential to attract rodents and snakes to camps through poor waste management, with a potential risk for bites or zoonotic diseases. 	<ul style="list-style-type: none"> ■ Effective management of waste-water and solid waste from camps, offices and work areas to prevent pollution of soil and surface/groundwater. ■ As part of communicable diseases strategy develop a malaria and vector control programme. This should include source reduction through environmental controls, chemical vector controls, bite prevention and effective medical services. ■ Develop entertainment facilities and a small supply store onsite that limits the need for the workers to enter the local communities. ■ Effective camp/site management and solid waste management, especially of food products to prevent attraction of rodents. Rodent controls in camps and workplace. ■ Snake handling (catch and release) capability ■ Limit domestic pets on site (dogs and cats) and as required support vaccination and sterilisation of animals. 	Verification	Quarterly	Contractor
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Worker welfare and living conditions	<p>Construction workers living in camps may encounter stress and discomforts that negatively impact their health and welfare. These stressors or discomforts may be caused by poor living conditions (accommodation, sanitary, health, recreation catering and laundry).</p>	<p>The contractor shall comply with minimum standards for camp buildings, facilities and services cited in Mozambique Law, Workers Accommodation process and standards (IFC). Standards covered include, but are not limited to:</p> <ul style="list-style-type: none"> ■ Building requirements; ■ First aid facilities and services; ■ Sanitary and ablution facilities; ■ Entertainment and recreation facilities and services; ■ Communication services; ■ Food and canteen facilities and services; ■ Transportation from the camps to the workers' homes scheduled according to the frequency of work shifts (e.g. if two shifts are at rest and one on duty, one shift should be off duty at home). Also allow family visits so as to discourage workers seeking socially undesirable options in the communities. 	<p>Verification</p>	<p>Ongoing</p>	<p>Contractor</p>
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Source of Impact	Potential Impact	Mitigation and Management	Monitoring	Monitoring Frequency	Responsibility
		<ul style="list-style-type: none"> ■ Accommodation requirements; and ■ Laundry facilities. 			
	Cultural issues (nationality, religion, discrimination and harassment, and so forth).	The contractor may provide prayer rooms and other facilities, as necessary and to the extent practicable, to satisfy the religious needs and customs of its workforce.	Verification	Ongoing	Contractor

Source of Impact	Potential Impact	Mitigation and Management	Monitoring	Monitoring Frequency	Responsibility
		<ul style="list-style-type: none"> Contractor's personnel shall not engage in any discrimination or harassing behaviour. The contractor shall establish an Equal Opportunity Policy to promote non-discrimination in accordance with Labour and Worker Conditions Management plan. The contractor shall implement a policy of Zero tolerance of sexual harassment (for example to prohibit use of language or behaviour, in particular towards women or children, that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate). The contractor shall implement a policy of Zero tolerance of violence or exploitation (for example the prohibition of the exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour) 	Verification	Ongoing	Contractor

Source of Impact	Potential Impact	Mitigation and Management	Monitoring	Monitoring Frequency	Responsibility
		The contractor shall implement a formal worker grievance procedure to address grievances between workers and company. Refer to the Worker Grievance section of the Labour and Worker Conditions Management plan.	Verification	Ongoing	Contractor
	Environmental stress (climate, noise, etc.)	<p>The contractor shall comply with the Minimum Health requirements for Project Execution Project Design Specifications (PDS) and health Design Specifications for Projects, and as per the requirements of the IFC Guidance for Worker Processes and Accommodation in addressing environmental factors including:</p> <ul style="list-style-type: none"> ■ Accommodation will be designed to suit climatic conditions; ■ Accommodation and surroundings shall be constructed so that noise does not interfere with sleep according to health requirements. ■ Health and hygiene inspections of facilities as per the above PDS. 	Verification	Ongoing	Contractor

Source of Impact	Potential Impact	Mitigation and Management	Monitoring	Monitoring Frequency	Responsibility
		Observance of specified rest periods between and during shifts.	Verification	Ongoing	Contractor
Code of Conduct	There is potential for conflict if workers behave inappropriately in their relations with the community and other workers.	The project shall establish a project-wide Code of Conduct, developed by the Proponent in conjunction with the contractor. The Code of Conduct will outline worker behaviour and interaction with the community. A copy of the code of conduct is to be presented and explained to all workers and signed by each person.	Verification	Ongoing	Contractor and/or Proponent
		The project shall conduct compulsory induction training (and regular refresher training) which covers a minimum cultural awareness (respect for local residents and customs) and anti-discrimination and also zero tolerance for GBV/SAE and sexual harassment at work. The content of the induction training is subject to Proponent review and approval.	Verification	Ongoing	Contractor and/or Proponent

Source of Impact	Potential Impact	Mitigation and Management	Monitoring	Monitoring Frequency	Responsibility
		The project shall provide transportation for commuting and/or rotating workers, as appropriate to and from the work site to limit local interaction and the development of squatter settlements. The project shall also engage with government/local authorities on issues and risks regarding these informal settlements around the perimeter of project activities and camp and within the communities.	Outcome; numerical tracking of workers transported to defined locations	Ongoing with quarterly statistical reporting	Contractor and/or Proponent
		Establishment of a Communication plan and Complaint Procedures which will be implemented by a Project Representative who will establish the link between the project, the workers and the local population. This representative should be able to speak the local language and Portuguese to allow communication with all workers of the camp. The representative is to be employed and managed by Contractor, selection and payment to be discussed once contractor has been appointed.	Verification	Ongoing	Contractor and/or Proponent

Source of Impact	Potential Impact	Mitigation and Management	Monitoring	Monitoring Frequency	Responsibility
Waste management	<p>Pollution and environmental impacts</p> <p>The camp has the potential to have off site pollution impacts from waste disposal, emissions and spills. Camp operations may also cause environmental issues, including deteriorating water quality, erosion, sedimentation, noise and air quality issues. These factors have the potential to affect the community if not adequately managed.</p>	The contractor shall exercise all reasonable due diligence to conduct its operations in a manner that will minimise pollution (community water resources, groundwater and surface water, light and spills) as set forth in Construction Environmental and Social Management Plan.	Verification	Ongoing	Contractor
		The contractor shall comply with the Waste Management Plan and Hazardous Materials Management plan which define requirements to contain, transport, handle and dispose of camp wastes and hazardous materials to avoid impacts to human health and the environment.	Verification	Ongoing	Contractor
		The contractor shall also apply appropriate management controls set out in the CTT HSSE Management plan.	Notification	Ongoing	Contractor
		Hazardous and non-hazardous waste must be suitably packaged separately.	Verification	Ongoing	Contractor
		Hazardous waste must be handled and stored in such a way as to avoid accidental release into the environment.	Verification	Ongoing	Contractor

Source of Impact	Potential Impact	Mitigation and Management	Monitoring	Monitoring Frequency	Responsibility
Operations of facilities	Hazardous Materials Exposure; Potential project facility releases to air, groundwater and surface water.	The contractor shall implement a spill response plan to include response to project related spills that may occur in the community and conduct drills as appropriate.	Verification	Ongoing	Contractor
In-migration	There is a low likelihood of in-migration into areas around the construction camps. However, people from outside the local area may migrate into existing settlements or develop new settlements in proximity to camps and the project area. Existing communities may also relocate to be closer to camps. In-migration can result in disputes and sometimes violence between the new settlers and the resident community. Increased population and development of new and uncontrolled settlements increase pressure on infrastructure, services and resources. The increased traffic from in-migration may also	<ul style="list-style-type: none"> ■ The contractor shall enforce a 'closed' camp policy unless otherwise agreed by the Proponent This is intended to deter individuals from setting up accommodation near camp. ■ The contractor shall inform potential in-migrants of the scale and nature of opportunities to manage their expectations. ■ The contractor shall communicate the project's hiring policy (strictly no hiring at the gate). ■ The contractor shall use planned routes for transport of Project materials, goods and personnel taking into account the potential for in-migrants to be attracted into informal roadside settlement. 	Verification	Ongoing	Contractor and/or Proponent

Source of Impact	Potential Impact	Mitigation and Management	Monitoring	Monitoring Frequency	Responsibility
	result in greater theft and smuggling of goods.	The contractor shall develop a Labour and Working Conditions Management plan at a minimum in compliance with the Mozambique Labour Law, Proponent's Health Safety Security and Environment Policy, Human Rights and Human Resources Policy, and HSSE Management plan. And WBG PS 2 and 4	Verification	Ongoing	Contractor and/or Proponent
		The contractor is to refer and abide by the worker accommodation process and standards (IFC).	Verification	Ongoing	Contractor and/or Proponent
Community resources	Any infrastructure, services or resources used by camps (e.g. water abstraction) that result in reductions/ shortage/interruptions for the local community will have a negative impact. There is potential for social envy and increased resentment from the community towards the project and project team if camp facilities are	The contractor shall utilise water sources for camp use in a manner that minimises impacts on local supply and use. Freshwater sources used by the contractor should be reviewed and accepted by the Proponent.	Verification	Prior to establishing the camps	Contractor
		The project shall routinely monitor the quality and supply of water source used by camp through quarterly sampling exercises.	Ongoing	Every 3 months	Contractor

Source of Impact	Potential Impact	Mitigation and Management	Monitoring	Monitoring Frequency	Responsibility
	perceived to be superior to those in the community. Services of note include camp health facilities, power supply, clean running water. Restricted ability to access these services may increase frustration at the level of the services available to them.	The Proponent will implement the In-Country Value plan and a Community Support Strategy which identifies strategic community investments. In addition to ensuring the project activities do not negatively affect local services, the contractor and proponent should explore ways to enable communities to improve their own access to services (e.g. service fairs, clean up campaigns, donation of salvage materials, in-kind contributions to improve local infrastructure such as roads).	Verification	Annual	Proponent
Procurement and supply of goods	Increased demand for food and other provisions may deplete natural resources, e.g. agriculture, fisheries, etc. potentially causing shortages of supply in the local community, and/or increasing the price of goods, affecting affordability for local communities.	The project shall not purchase products in the local community unless through formal contracts with approved suppliers as per the In-Country Value and CTT's Supply Chain Policy (all CTT policies are yet to be formulated and implemented).	Verification	Ongoing	Contractor
	Positive impact - Potential increased local income from the purchase of local fresh produce for project catering services.		Verification (Procurement & Supply MP)	Quarterly	Contractor and/or Proponent

5.1 Camp inspection and verification activities

Inspections and audits shall be conducted to evaluate compliance with the requirements of the w-CMP. Routine verification and inspection will be carried out according to the environmental and social inspection checklists for the camp. These inspection checklists and audit reports should be kept on record and appended to the w-CMP for reference.

5.1.1 Site Inspections

The ESO and CLO shall undertake regular (at least once a month) inspections of all campsites to identify any camp activities or components that are causing, or may cause, a potential environmental or social impact. The inspection process includes the recording of incidents and reporting of observations and non-conformances and the follow up and tracking of actions to closure.

5.1.2 Audits

The main goals of a w-CMP audit are to evaluate compliance with stipulated w-CMP requirements, to identify any non-conformance and to assess whether objectives and targets have been achieved. An audit programme and procedure shall be developed by The Proponent to ensure that they are sufficiently comprehensive and scheduled. Additionally, a worker's survey can aid in identifying follow-up actions for improving the safety and well-being of the workers and the camp.

5.2 Corrective and preventative action

The need for setting corrective action shall arise from deviations from:

- A predetermined baseline or limit (as detected through monitoring); or
- w-CMP requirements.

The Proponent will manage and track all environmental and social related actions originating from the following sources via an environmental and social tracking database(s) as necessary:

- Incident reports;
- Grievance reports;
- Meetings;
- Root cause investigations;
- Management review;
- Evaluation of contractor compliance;
- Inspections; and
- Worker's and community surveys.

6.0 TRAINING, AWARENESS AND COMPETENCY

Training is a critical component to raise awareness of the various impacts and associated management functions of the plan. Contractor shall ensure that all personnel responsible who are involved in activities that could result in environmental or social impact(s) and responsible for the execution of the tasks and requirements

contained within this plan and any related plans (include a consolidated checklist) receive training and are competent.

Training shall take the form of, but not be limited to topical training, induction training, use of educational posters and daily environmental and social discussion topics prior to the start of each shift. During these training sessions, the following principles shall be presented:

- The Proponents corporate environmental, health and safety policies and applicable Mozambican environmental regulations.
- Their roles and responsibilities in achieving conformity with the requirements of the work camp.
- Environmental Permits and their conditions in the work camp.
- The management plan and its procedures for managing identified environmental and social impacts arising from work camp operations and interactions with community members. These include:
 - Restrictions and procedures for collection, treatment and disposal of waste and hazardous substances;
 - Firefighting procedures;
 - Procedure for emergency response;
 - Procedures for incident reporting and handling; and
 - The need to refrain from destruction of animals and plants, indiscriminate defecation, waste disposal and pollution of local soil and water resources.
 - Respectful relation with the community, adherence to the code of conduct and avoidance of certain behaviours, particularly those related to GBV/SAE and harassment and violence of any kind.

The contractor shall:

- Describe the training and awareness requirements necessary for the effective implementation of the plan; and
- Document training activity associated with the w-CMP by means of a training needs assessment, training matrix/plan and records of training undertaken.
- Design a community awareness plan that informs communities about risks and the obligations of contractors and provides a channel for complaints and comments.

6.1 Performance Indicators

Table 2 outlines the indicators for measuring and verifying performance in relation to camp management.

Table 2: Performance Indicators

Performance Indicator	Measurement	Assessment Frequency*
Participation in training on work camp management	100% of workers residing at camp should undergo training on camp management.	Monthly

Performance Indicator	Measurement	Assessment Frequency*
Compliance to the Camp Monitoring Plan	An 80% compliance with the standards outlined in the Camp Monitoring plan (contained in the Temporary Construction Camp Standard).	Monthly
Worker satisfaction with living conditions in the work camp	Number of workers' grievances related to camp management. Communication frequency and quantity from Employee Suggestion Box and Engagement Surveys	Monthly

7.0 EMERGENCY PREPAREDNESS AND RESPONSE

The contractor shall establish and maintain procedures to identify the potential for and to respond to accidents and emergency situations in accordance with Mozambican law and recognised international standards. The procedure(s) shall also address measures to prevent such situations and to mitigate environmental impacts that may be associated with them.

The emergency procedure(s) shall include the establishment of a network of communication between The Proponent, contractors, workers, CTT medical and security personnel, available emergency services including police, traffic police, local medical and ambulance services, fire departments, community associations, specialist services etc., that may be available. The procedure will detail the available medical and security resources at the camp (first aid, paramedics/doctor, clinic, ambulances etc).

The emergency plan shall be tested on a regular basis through the use of drills and mock emergencies so as to identify and rectify any shortcomings. The procedures developed should be aligned with the CTT project Emergency Preparedness and Response Framework (EPRF), which has been developed as part of the ESIA.

8.0 COMMUNICATION, COORDINATION AND REPORTING

The structure for all communication, correspondence and reporting between project stakeholders shall be defined at the beginning of the work of the contractors.

The Proponent aims to engage respectfully and in a timely manner with all relevant stakeholders. The Stakeholder Engagement plan details its approach in relation to communications with stakeholders.

Note: All communication with the Mozambique Government regarding camp management matters shall be via the Proponent. All communication with local structures shall be undertaken in conjunction with the CTT Communications Manager and CLO appointed for the construction period.

8.1 Grievance mechanism

The proponent will, scaled to the risks and adverse impacts of the project, establish a grievance mechanism as part of the management system. This will allow the proponent to receive and facilitate resolution of concerns and grievances about the project's social and environmental performance raised by workers, individuals or groups from among project-affected communities. The proponent will inform the affected communities about the mechanism during its community engagement process and ensure that the mechanism addresses concerns promptly and transparently, in a culturally appropriate manner, and is readily accessible to all segments of the affected communities.

The Contractor will support with the implementation of the grievance management procedure. Once complaints from affected people are received, they will be documented in the grievance database, in order to keep track of the investigations of complaints, how grievances were dealt with and corrective measures. The Contractor will communicate the responses and corrective measures to the complainants and resolve a grievance immediately in the field when practicable.

9.0 DOCUMENT CONTROL

This document provides a basis for environmental and social management at camp. Based on the results of the performance assessment and review process, the w-CMP may be modified as the project progresses. The modifications shall only be permitted by the CTT Environmental Coordinator, who shall retain a single master copy of this w-CMP on the internal system (yet to be developed Environmental and Social Management System (ESMS)). All changes to the w-CMP shall be tracked, including details of the change, date of the change and the name of the reviewer. The Environmental Coordinator shall ensure that any modifications are communicated, explained to and discussed with all affected parties (i.e. the authorities, the contractors, CTT management and any directly affected party who requests this information).

Signature Page

Golder Associados Moçambique Limitada

Cândida Boavida
Environmental Consultant

Dr D de Waal
Technical Director

CB/DdW/jp

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