

South Asia Co-operative Environment Programme (SACEP) Plastic free Rivers and Seas for South Asia (P171269)

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP) OF MATERIAL RECOVERY FACILITY - KALLAPPADU

GRANTEE: NEGOMBO RECYCLING CLUB PVT LTD - SRI LANKA

Environmental and Social Management Plan (ESMP)

Building a Blue Lanka by Uplifting Communities - BLUECAP

1. Subproject Information

Subproject Title:	Material Recovery Facility -Kallappadu, Mullaitivu District
Estimated Cost:	19,310 USD
Start/Completion Date:	01.05.2024-31.05.2025

2. Site/Location Description

The proposed Material Recovery Facility (MRF) site is located at Kallappadu, Vannankulam, in Mullaitivu Local Authority area in Mullaitivu district of the Northern Province in Sri Lanka. The site consists of 44 perches of privately owned flat land with clear ownership, and NRC has signed an agreement with the owners(Annexure 4). Therefore, no involuntary land acquisition issues are anticipated for the project.

The area is primarily residential, with houses surrounding it, and the sea is located within a 1-kilometer radius. In terms of the local community, the area primarily consists of individuals engaged in residential living, agricultural, and fishing communities.

The land is situated in a coastal area with typical coastal vegetation and palm trees. The site area of influence of the site does not contain any protected habitats. An access road to the site is available. The project needs to establish provisions for water and electricity supply. The water supply will be sourced from the public and used solely for the workers' consumption and daily needs. No water will be used in the operational process.

The site is located in the dry zone and features a dry climate. The city features a dry season from April through August and a wet season for the remainder of the year. The city sees on average roughly 1,570 millimeters (62 in) (max. November - 388mm and min March - 53mm)of precipitation annually. Average temperatures in Kilinochchi range from around 26 °C (79 °F)- 30 °C (86 °F). The warmest months of the year are from April through September.

The Population of Mullative District was 98,000 in 2021 and the total number of families was 36,844.

Coordinates of the location - 1023619N, 4807205E, 9°15'36.7"N 80°49'27.2"E

[Map of the Location](#)



3. Sub-Project Description and Activities

Facilitating a new MRF

This project involves the construction and operation of a recyclable plastic collection center, which will include the following components during the project period. Operations will continue for an additional 5 years, as per the agreement with the MRF Owner and NRC.

Construction Phase

1. Constructing a 20x30 sq. ft. collection center with a concrete floor, a shelter, and metal sheet side covers.

Operational Phase

2. Collecting recyclable plastic, manually sorting it, and baling the sorted plastics.
3. Storing the bales under shelter until dispatch.
4. Additionally, three electric bicycles will be provided for collecting recyclable plastic.

The Material Recovery Facility aims to collect 14 tons of recyclable plastic per month and deliver it to the Negombo Recycling Club for recycling. Its operational area will cover a radius of up to 20 km within the Mullaitivu district. The operations of the MRF, supported by the project, will continue until the end of the project, after which the NRC will take over responsibility.

Construction Phase:

Approximately 02 skilled and 02 unskilled workers will be deployed for two months for the construction of the hut.

Operational Phase:

For the operation phase, approximately 3 skilled workers and 3-5 unskilled workers are occupied and recruited gradually while continuously trained on the operations of MRF.

Institutional Arrangements

This sub-project is implemented by NRC as part of its initiative to establish new Material Recovery Facilities (MRFs). NRC has formalized a legal agreement with the landowner, defining the rights and responsibilities of both parties. The agreement outlines the terms of collaboration, ensuring the successful implementation of the project and the development of a robust material flow plan for recyclable materials (annex 04).

Under the agreement, NRC is responsible for providing key resources, including a storage hub, baler machine, electric cycle, drop-off bins, and bags, to support the MRF's operations related to collecting and managing recyclable plastic waste. NRC also oversees awareness and public relations activities and ensures compliance with national environmental and Environmental and Social Management Plan (ESMP) requirements. Additionally, NRC provides training for MRF owners, MRF staff, and other personnel nominated by the facility.

Construction activities are conducted by a contractor selected through NRC's competitive bidding and procurement process, under the supervision of the Technical Officer and the Environmental & Social (E&S) Officer mobilized by NRC. The MRF, in turn, is accountable for collecting recyclable plastic waste, supplying materials, and effectively utilizing and managing the resources provided. The MRF is also responsible for ensuring compliance with national laws and ESMP requirements.

NRC has a zero-tolerance policy on PSEA (Prevention of Sexual Exploitation and Abuse) and SH (Sexual Harassment). All the contractors, subcontractors, and all staff are required to adhere to the zero tolerance by signing the Code of Conduct, PSEA/ SH Policy.

The grievance Readiness Mechanism is established to effectively handle and address complaints or concerns raised by stakeholders, employees, or the public regarding the sub-project (Annex 6). It ensures that grievances are promptly acknowledged, investigated, and resolved fairly and transparently.

4. ESMP Matrix: Risk and Impacts, Mitigation, Monitoring

The below ESMP Tables reflect the E&S risks and impacts that are related to the design of the facilities and the operation and take into account the local specificities of the respective site.

4.1 Construction stage

Anticipated E&S Risks & Impacts	Risk Mitigation & Management Measures	Impact Mitigation		Impact/Mitigation Monitoring			Mitigation & Monitoring Cost USD
		Location/Timing/Frequency	Responsibility	Parameter to be monitored	Methodology, including Location & Frequency	Responsibility *	
Disturbance to the vegetative soil during ground preparation activities due to the removal of ground vegetation cover.	10 trees will be planted in and outside of the facility as a compensation measure.	at site /During Construction	MRF Owner	10 of trees planted	Monthly Monitoring photo evidence Site visit	E and S Officer NRC Technical Expert(Emt) Country team	150
Soil and water pollution due to improper discharge of wastewater generated during construction	Construction wastewater will be directed to a pit.	Construction site(01 day)	Contractor and the Environmental and Social officer	Availability of the pit Checking the practice of water discharge	Regular Monitoring One site visit during construction and monthly meetings- Online by country team/ NRC	NRC- E and S Officer Technical Expert(Emt) Country team/NRC	
Noise Pollution during excavation and earthworks soil compaction, cutting iron bars and machine installation and public nuisance	Construction works will be carried out during daytime. A Grievance Redress Mechanism will be developed and implemented, which will include maintaining a public complaint box.	At site/ During excavation and Earthwork, Earth filling and compaction, machine installation, and steel	Contractor and the Environmental and Social office	Noise measurement records # of grievances received regarding noise	Regular Monitoring One site visit during construction and monthly meetings- Online by country team/ NRC	NRC- E and S Officer NRC Technical Expert(Emt) Country team	50

Anticipated E&S Risks & Impacts	Risk Mitigation & Management Measures	Impact Mitigation		Impact/Mitigation Monitoring			Mitigation & Monitoring Cost USD
		Location/Timing/Frequency	Responsibility	Parameter to be monitored	Methodology, including Location & Frequency	Responsibility *	
	<p>Noise levels at the boundary of the Land will be maintained below 75dB(A).</p> <p>Less Noisy Equipment (At least D4-type machines) will be used to minimize the noise</p>	works (01 to 02 days for each activity)					
Solid waste Accumulation	<p>A construction waste management plan will be developed and used.</p> <p>Construction waste will be sorted for reuse. Any remaining waste will be removed from the site by the building contractor in coordination with the Local Authority.</p> <p>Daily records related to waste management will be maintained.</p>	at the site throughout the activity (01 months)	Contractor	<p>Availability of the plan</p> <p>Evidence for construction waste being sorted</p>	<p>Monthly Monitoring</p> <p>Monthly meeting</p>	<p>NRC- E and S Officer</p> <p>Technical Expert(Env't) Country team</p>	<p>Practical measure that does not need additional cost</p>
Soil and water contamination, along with potential mosquito breeding, due to the generation of wastewater during construction	<p>Construction wastewater will be directed to a dedicated sedimentation pit to prevent soil and water contamination.</p> <p>Surrounding areas will be</p>	On-site, throughout the activity	Contractor	<p>Records of cleaning</p> <p>Evidence of maintenance of channels</p>	Monthly monitoring	NRC- E and S Officer	<p>Costs of repellent 50</p> <p>Cleaning does not need</p>

Anticipated E&S Risks & Impacts	Risk Mitigation & Management Measures	Impact Mitigation		Impact/Mitigation Monitoring			Mitigation & Monitoring Cost USD
		Location/Timing/Frequency	Responsibility	Parameter to be monitored	Methodology, including Location & Frequency	Responsibility *	
	<p>cleaned daily to remove potential mosquito breeding sites.</p> <p>Drainage channels will be maintained to ensure proper water flow and prevent stagnation.</p> <p>Mosquito repellents and larvicides will be applied to stagnant water areas as needed.</p>			Evidence for application of repellent		Technical Expert(Emt) Country team	additional cost.
Occupational Health and Safety (OHS) Risks for workers during construction, electrical wiring, and machinery setup.	<p>All workers will be equipped with necessary personal protective equipment (PPE), including helmets, gloves, safety boots, goggles, and high-visibility vests to reduce the risk of physical injuries.</p> <p>Strict safety protocols will be implemented for all electrical wiring activities.</p> <p>Fully stocked first aid kits will be maintained and made</p>	On-site, throughout the activity	Contractor	<p>% of workers wearing appropriate PPE during construction activities</p> <p>Availability of First Aid box, Accident Register</p> <p>Daily checking of water</p>	<p>Monthly Monitoring</p> <p>One site visit during construction and monthly meetings- Online by country team/ NRC</p>	<p>NRC- E and S Officer</p> <p>Technical Expert(Emt) Country team</p>	200

Anticipated E&S Risks & Impacts	Risk Mitigation & Management Measures	Impact Mitigation		Impact/Mitigation Monitoring			Mitigation & Monitoring Cost USD
		Location/Timing/Frequency	Responsibility	Parameter to be monitored	Methodology, including Location & Frequency	Responsibility *	
	<p>accessible to the workers on-site.</p> <p>Proper sanitary facilities (separate for men and women) will be provided, and access to safe drinking water will be ensured for all workers.</p> <p>Adequate, well-ventilated workspaces, clean eating areas, and separate sleeping areas for men and women (if necessary) will be provided to ensure workers' comfort and well-being.</p>			accumulated places and cleaning			
Lack of understanding of EHS risk, impacts, and mitigation measures leads to accidents and health impacts.	<p>The capacity of the construction company will be accessed on OHS.</p> <p>Workers will be trained on OHS through toolbox talks</p>	On-site, throughout activity	Contractor	<p>Evidence for capacity assessment.</p> <p>Number of toolbox talks conducted</p>	Monthly Monitoring	<p>NRC- E and S Officer</p> <p>Technical Expert(Env't) Country team</p>	practical measure that does not need additional cost

<p>Risks of Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH)</p> <p>a) between project workers;</p> <p>b) between Project workers and local community members</p>	<p>A PSEA Focal Point will be appointed at the project level (Assistant Manager - Male and Field Officer - Female, Sinhala and Tamil speaking).</p> <p>Visibility of the reporting line will be displayed at the site</p> <p>Awareness training will be provided on recognizing, and preventing SEA/SH for</p> <p>a) Project site workers and contractors</p> <p>b) affected communities.</p> <p>Training will be provided on the reporting line of SEA/SH-related grievances for Project workers and staff.</p> <p>Awareness and visibility material will be displayed for communities.</p> <p>All Project workers are required to sign a Code of Conduct (CoC)</p> <p>Specific and dedicated SEA/SH response mechanism will be provided including referral to SEA/SH services.</p>	<p>Training and awareness will be conducted before the commencement of work.</p> <p>Implementation of Focal Points and signing of CoC by the contractor at the site during the construction period.</p>	<p>Environmental and Social officer</p> <p>Gender focal point of the project</p>	<p>Number of training sessions provided to workers</p> <p>Number of awareness sessions provided to project staff and communities</p> <p>Number of awareness done for communities and Availability of visibility material on GRM.</p> <p>Percentage of workers that have signed the CoC</p>	<p>Monthly Monitoring</p> <p>site visit and meeting</p>	<p>Gender focal point of the project</p> <p>Technical Expert(Env't)</p> <p>Country team</p>	<p>50</p> <p>(Most measures are practical measures that do not require additional cost)</p>
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Anticipated E&S Risks & Impacts	Risk Mitigation & Management Measures	Impact Mitigation		Impact/Mitigation Monitoring			Mitigation & Monitoring Cost USD
		Location/Timing/Frequency	Responsibility	Parameter to be monitored	Methodology, including Location & Frequency	Responsibility *	
Potential for social issues related to labor influx	<p>Worker grievance meetings will be conducted.</p> <p>Training will be provided to raise awareness of communicable diseases and Gender-based violence</p>	at site	Contractor and the Environmental and Social officer	Availability of meeting records	Regular Monitoring site visitor meeting	<p>NRC- E and S Officer Gender focal point of the project</p> <p>Technical Expert(Emt) Country team</p>	
Non-compliance with the local regulatory requirements and workers' dissatisfaction due to extensive work requirements	<p>A workers' GRM will be developed and implemented.</p> <p>An LMP will be developed and implemented in line with PLEASE Project LMP and national labor laws.</p> <p>Wages will be paid for workers as per Labor Management Procedures (LMP)</p>	On-site, throughout activities	Contractor and HR Officer	<p>A number of workers' grievances filed Availability and implementation of code of conduct.</p> <p>Payrolls</p> <p>Site visit and reviewing received complaints</p>	Monthly Monitoring	Technical Expert(Emt) Country team and NRC	Cost for GRM (repeating cost) 75
Risk of child labor	All recruitments will be conducted in accordance with the minimum age requirements of the Project, in compliance with national laws and ESS2 (Labor and Working Conditions). The age of all workers will be documented at the time of	At the site, throughout construction	Contractor and the Environmental and Social officer - NRC	<p>Number of workers' grievances filed</p> <p>Number of track record searches conducted</p>	Monthly monitoring	<p>NRC- Gender focal point of the project</p> <p>Technical Expert(Emt) Country team</p>	Practical measure that does not need additional cost

Anticipated E&S Risks & Impacts	Risk Mitigation & Management Measures	Impact Mitigation		Impact/Mitigation Monitoring			Mitigation & Monitoring Cost USD
		Location/Timing/Frequency	Responsibility	Parameter to be monitored	Methodology, including Location & Frequency	Responsibility *	
	<p>hiring to ensure adherence to these regulations.</p> <p>The age of workers will be verified with communities where required.</p> <p>A track record search of the contractors will be conducted during the procurement process (record of health and safety violations, fines, consult public documents related to workers' rights violations, GBV/SEA/SH issues, etc.)</p>						
Risk of forced labor	<p>A Workers' GRM will be established, ensuring workers have access to the Project's GRM.</p> <p>Awareness will be raised in communities.</p>	Throughout construction	Contractor	Number of grievances filed in workers' GRM	Monthly monitoring	<p>NRC-E & S officer</p> <p>Technical Expert(Env't) Country team</p>	75

Anticipated E&S Risks & Impacts	Risk Mitigation & Management Measures	Impact Mitigation		Impact/Mitigation Monitoring			Mitigation & Monitoring Cost USD
		Location/Timing/Frequency	Responsibility	Parameter to be monitored	Methodology, including Location & Frequency	Responsibility *	
Lack of stakeholder engagement	<p>A Site-specific stakeholder map will be established including vulnerable groups, project-affected parties, and other interested parties (based on the Project Stakeholder Engagement Plan - SEP)</p> <p>Information dissemination channels will be defined for the identified stakeholders and provide sub-project-related information.</p> <p>Consultation channels of the mapped stakeholders will be defined and consultations will be conducted with all stakeholders including on environmental and social risks and mitigation measures.</p>	Before the commencement of works	Contractor and the Environmental and Social officer - NRC	<p>Availability of stakeholder mapping</p> <p>Number of project information dissemination events</p> <p>Number of consultations with identified stakeholders</p> <p>Number of consultations with identified members of vulnerable groups</p>	Monthly monitoring	Technical Expert(Envt) Country team and NRC	1000
Lack of a Grievance Redress Mechanism (GRM)	<p>Awareness of the Project GRM and its reporting channels will be raised.</p> <p>Additional reporting channels will be provided through complaint boxes installed at the sub-project site.</p>	<p>Sub-Project Location/Throughout the operational period</p> <p>SEA/SH referral service mapping is to</p>	Contractor-NRC /Gender focal point of the project	<p>Number of awareness sessions held</p> <p>Number of complaint boxes installed</p>	<p>Monitoring method: Grievance Redress Mechanism, Complaint log and implementation</p> <p>Monitoring period: Monthly</p>	<p>E & S Officer NRC</p> <p>Gender focal point of the project</p> <p>Technical Expert (Envt)</p>	75

Anticipated E&S Risks & Impacts	Risk Mitigation & Management Measures	Impact Mitigation		Impact/Mitigation Monitoring			Mitigation & Monitoring Cost USD
		Location/Timing/Frequency	Responsibility	Parameter to be monitored	Methodology, including Location & Frequency	Responsibility *	
	<p>The contact details of the SEA/SH Focal Point will be placed on notice boards in the project location.</p> <p>Complaints received through the complaint boxes at the site will be handled appropriately or transferred to the Project GRM.</p> <p>Complaints will be received through a dedicated reporting line for SEA/SH, and focal points for SEA/SH will handle them with strict confidentiality and in a survivor-centered manner.</p> <p>A map of local SEA/SH service providers will be established and will ensure every case reported is provided with referrals, if the survivor wishes that.</p>	<p>be conducted before the commencement of works</p> <p>Linkages to Project GRM established before the works</p>		<p>Number of SEA/SH Focal Points appointed</p> <p>A number of SEA/SH cases reported that receive referral services.</p> <p>Map of local SEA/SH service providers available</p>			

*** Overall Monitoring and supervision of the implementation of ESMP will be done by the PIU and UNOPs team.**

4.2 Operational Stage

Anticipated E&S Risks & Impacts	Risk Mitigation & Management Measures	Impact Mitigation		Impact/Mitigation Monitoring			Mitigation & Monitoring Cost USD
		Location/Timing/Frequency	Responsibility	Parameter to be monitored	Methodology, including Location & Frequency	Responsibility*	
Solid waste accumulation During sorting plastic and risk of public nuisance due to open burning	<p>A Waste Management Plan will be developed and implemented.</p> <p>Non-recyclable waste generated will be disposed of with the Local Authority.</p> <p>Segregated degradables will be composted.</p> <p>Open burning will be prevented.</p> <p>Surrounding areas will be cleaned daily to remove potential mosquito/vector/pest breeding sites.</p>	At the MRF Facility, daily	MRF Owner	<p>Inhouse Waste Management Plan</p> <p>Disposal and dispatching of records</p>	<p>Monthly monitoring</p> <p>One visit during the operational period</p>	<p>NRC- E and S Officer</p> <p>Technical Expert (Envt) and NRC</p>	<p>50</p> <p>(Most measures are practical measures that do not require additional cost)</p>
Oil leakage from the baler machines can result in soil contamination in	Baler machines will be placed on a concrete floor to prevent oil	At MRF Facility Regularly	MRF Owner, Bailer Operator	Maintenance record of baler machines	Regular monitoring, site visits, and checking of records	<p>NRC- E and S Officer</p> <p>Technical Expert (Envt) and NRC</p>	Concreting cost included in the construction

Anticipated E&S Risks & Impacts	Risk Mitigation & Management Measures	Impact Mitigation		Impact/Mitigation Monitoring			Mitigation & Monitoring Cost USD
		Location/Timing/Frequency	Responsibility	Parameter to be monitored	Methodology, including Location & Frequency	Responsibility*	
the surrounding area.	<p>from seeping into the soil.</p> <p>Machines will be regularly maintained and inspected to prevent oil leakages.</p> <p>Training will be provided to operators to ensure they are equipped to handle and use the machines properly.</p>			<p>Training record for the Bailer operator</p> <p>Number of oil leakage reported</p>			(5x5 ft cost 112)
Noise generation during the bailing process and public nuisance and health implications to workers	<p>Boundary limits of Noise will be maintained as per the National Standards (55dB (A)</p> <p>Appropriate PPEs will be provided for the workers</p>	At the MRF Facility, daily, Machinery purchasing	MRF Owner	<p>% of workers using appropriate PPE</p> <p># of complaints filed by workers</p>	Monthly Monitoring	NRC- M& S Officer	50

Anticipated E&S Risks & Impacts	Risk Mitigation & Management Measures	Impact Mitigation		Impact/Mitigation Monitoring			Mitigation & Monitoring Cost USD
		Location/Timing/Frequency	Responsibility	Parameter to be monitored	Methodology, including Location & Frequency	Responsibility*	
	<p>A Grievance Redress Mechanism will be established including maintaining public complaint Box</p> <p>Machines with lower noise levels will be selected, and timely maintenance will be carried out to ensure reduce noise pollution.</p>			Noise level at the boundaries			
During the rainy season, water may seep through the net walls, creating a wet environment inside the facility, which can result in a non-conductive working environment for the employees.	The open net will be properly covered during the rain.	At the MRF Facility, During rainy hours	MRF Owner	# of complaints filed by workers	Monthly Monitoring	<p>NRC- E and S Officer</p> <p>Technical Expert (Env't) and NRC</p>	25
OHR risks for workers during operation	Separate sanitary facilities will be provided for male and female workers with	At the MRF Facility, daily	MRF Owner	Availability of adequate sanitary facilities,	Regular Monitoring	NRC- E and S Officer	400

Anticipated E&S Risks & Impacts	Risk Mitigation & Management Measures	Impact Mitigation		Impact/Mitigation Monitoring			Mitigation & Monitoring Cost USD
		Location/Timing/Frequency	Responsibility	Parameter to be monitored	Methodology, including Location & Frequency	Responsibility*	
	<p>access to safe drinking water, and a clean dining area</p> <p>Training will be provided on safety and proper use of personal protective equipment (PPE) and daily safety briefings will be conducted.</p> <p>A First aid box will be provided with access.</p> <p>Fire extinguisher will be installed</p> <p>An Emergency Preparedness Plan will be developed and implemented, with awareness training on how to respond effectively to emergencies.</p> <p>An accident registry will be maintained.</p>			<p>% of workers that wear appropriate PPE</p> <p>Availability of valid Fire extinguishers,</p> <p>Availability of First Aid box</p> <p>Accident records and follow-up actions are available.</p> <p>Availability of Emergency Preparedness plan</p> <p># of awareness sessions on plan</p> <p>Daily checking records</p>	<p>Site visits and checking records</p> <p>visit during the operational period and weekly meetings</p>	Technical Expert (Env't)	

Anticipated E&S Risks & Impacts	Risk Mitigation & Management Measures	Impact Mitigation		Impact/Mitigation Monitoring			Mitigation & Monitoring Cost USD
		Location/Timing/Frequency	Responsibility	Parameter to be monitored	Methodology, including Location & Frequency	Responsibility*	
	<p>Regular medical checkups will be conducted for workers.</p> <p>The Instruction Board will be displayed, featuring important instructions for all workers.</p> <p>Domestic wastewater will be directed to a septic tank (No. 3 of ER)</p>			Medical check-ups records			

Risks of Sexual exploitation and abuse (SEA) and sexual harassment (SH) among workers and between workers and community members around the facility	<p>A Workers' Grievance Redress Mechanism (GRM) will be established to address and resolve workers' complaints and grievances in a timely and transparent manner.</p> <p>A dedicated SEA/SH (Sexual Exploitation and Abuse/Sexual Harassment) reporting line will be established to ensure that individuals can report incidents of SEA/SH safely and confidentially.</p> <p>The PSEA Focal Point will be appointed at the project level (Assistant Manager and Field Officer, both fluent in Sinhala and Tamil). The reporting line will be managed by NRC.</p>	At the MRF Facility, Throughout the operation	Contractor and the Environmental and Social officer Gender focal point of the project	<p>Availability of workers' GRM and SEA/SH Focal Points</p> <p>Availability of reporting system</p> <p>Availability of a list of GBV service providers</p> <p>Number of SEA/SH awareness sessions done for a) workers, b) surrounding communities</p> <p>Availability of CoC</p> <p>Percentage of workers that have signed the CoC</p>	<p>Site visits and checking records</p> <p>One visit during the operational period</p>	<p>NRC- E and S Officer</p> <p>Gender focal point of the project</p> <p>Technical Expert (Env't) and NRC</p>	150
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	<p>An anonymous reporting system will be provided, along with protection measures for individuals who report SEA/SH cases, ensuring their safety and confidentiality.</p> <p>Referrals will be made to SEA/SH service providers as needed, ensuring timely and appropriate support.</p> <p>Training will be provided for both workers and communities on how to recognize, prevent, and respond to incidents and reporting of Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH).</p> <p>A Code of Conduct for workers at the facility will be implemented including reference to SEA/SH.</p>						
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Anticipated E&S Risks & Impacts	Risk Mitigation & Management Measures	Impact Mitigation		Impact/Mitigation Monitoring			Mitigation & Monitoring Cost USD
		Location/Timing/Frequency	Responsibility	Parameter to be monitored	Methodology, including Location & Frequency	Responsibility*	
	Workers at the facility will be required to sign a Code of Conduct (CoC).						
Potential for social issues related to labor influx	<p>Worker grievance meetings will be conducted.</p> <p>Training will be provided to raise awareness on communicable diseases and gender-based violence.</p>	At the MRF Facility, daily	Contractor and the Environmental and Social officer	Availability of meeting and training records	Regular monitoring, site visits, and checking of records	Gender specialist - NRC	
Non-compliance with the local regulatory requirements and workers' dissatisfaction due to extensive work requirements	<p>An LMP will be developed and implemented in line with PLEASE Project LMP and national labor laws.</p> <p>A workers' GRM will be established.</p> <p>Wages will be paid following prevailing national laws.</p>	At the MRF Facility, daily	Facility Manager and HR Officer	<p>Number of workers' grievances filed</p> <p>Payrolls</p>	Monthly Monitoring	Technical Expert (Env't) Country team and NRC	1550

Anticipated E&S Risks & Impacts	Risk Mitigation & Management Measures	Impact Mitigation		Impact/Mitigation Monitoring			Mitigation & Monitoring Cost USD
		Location/Timing/Frequency	Responsibility	Parameter to be monitored	Methodology, including Location & Frequency	Responsibility*	
Risk of child labor at the facility	<p>Recruitment will be conducted in accordance with the minimum age requirements of national laws and the age of workers will be documented upon hiring.</p> <p>The age of workers will be verified with National Identity cards/Birth certificates and communities where required.</p>	At the MRF Facility, daily	Operation Manager-MRF	Number of workers' grievances filed	Monthly monitoring	<p>NRC- E and S Officer</p> <p>Technical Expert (Envt) and NRC</p>	
Risk of forced labor	<p>Provide workers' GRM and access to Project GRM.</p> <p>Awareness will be raised within communities regarding the dangers and implications of forced labor.</p>	Throughout operation	Operation Manager-NRC	Number of grievances filed in workers' GRM	Monthly monitoring	<p>NRC- E and S Officer</p> <p>Technical Expert (Envt) and NRC</p>	
Gender discrimination in	Non-discriminating guidelines will be	Throughout operation	Operation Manager-NRC	Availability of HR Policy	Monthly monitoring	NRC- E and S Officer	

Anticipated E&S Risks & Impacts	Risk Mitigation & Management Measures	Impact Mitigation		Impact/Mitigation Monitoring			Mitigation & Monitoring Cost USD
		Location/Timing/Frequency	Responsibility	Parameter to be monitored	Methodology, including Location & Frequency	Responsibility*	
job opportunity and wage	<p>introduced for the recruitment process and operations affecting all levels of workers.</p> <p>Equal wages will be ensured for all male and female workers.</p>			Grievance Redress Mechanism		Technical Expert (Envt) and NRC	

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5. Capacity Development & Training

Requirements of capacity building, training, or new staffing that may be necessary for effective implementation.

01. Community Awareness of Plastic management and collection

Capacity Building and Training During the Construction Phase-

01. Toolbox talks to the workers of the facility
02. Networking the collectors with MRF and public relations activities
03. Training the contractors and the supervisor staff on OHS, SEA/SH, PSEA, COC

Capacity Building and Training During the Operational Phase

01. Training on safeguards, first aid, emergency preparedness, and fire drills for MRF owners and staff.
02. Provide training on recognizing, preventing, and responding to SEA and SH for both MRF owners and staff.
03. Provide awareness on recognizing, preventing, and responding to SEA and SH, including reporting for workers, collectors, and community members who reach the MRF and surrounding areas.
04. Consultation and awareness on Gender-Based Violence (GBV) for both Community and workers
05. Training on Machine operations and operational procedures of sorting, housekeeping, environmental protection, and waste management for MRF owner and staff
06. Awareness of communicable diseases for communities and workers including MRF owners

6. Implementation Schedule and Cost Estimates

[illegible]

of the Gender Action Plan (GAP)												
ESMP Monitoring												Staff cost

7. Attachments

- [1. MRF Mullaitivu Kallappadu _CEA approval.pdf](#)
- [2. MRF Mullaitivu Kallappadu _ deed and survey plan 2 .pdf](#)
- [3. MRF Mullaitivu Kallappadu Rent Agreement 2 .pdf](#)
- [4. MRF Mullaitivu Kallappadu _Agreement .pdf](#)
- [5. MRF Mullaitivu _Stakeholder Consultation Report](#)
- [6. Building approval certificate.pdf](#)

Grievance Redress Mechanism

The Project will be subject to the Grievance Redress Mechanism implemented by SACEP, as laid out in the Project ESMF (Section 8.2). The implementing partners will actively promote SACEP's GRM at the project site.

[7. Grievance Redress Mechanism](#)

Labor Management Procedures

The Project will comply with the Labor Management Procedures prepared for the SACEP PLEASE Project (27 October 2020)¹.

[8. MRF _Labor Management Procedures](#)

IV. Review & Approval

 <p>Prepared By:(Signature)</p> <p>Position: Date: 01 .01. 2025</p>	
<p>Reviewed By: ... (Signature)</p> <p>Sarojinie Jayasekara</p> <p>Position: Technical expert - Environment of the Country Team</p> <p>Date 01 .01.2025</p>	<p>Approved By </p> <p>Kapila Mahesh Rajapaksha,</p> <p>Position: Environment and Social Development Specialist. SACEP</p> <p>Date: 21 .01. 2025</p>

¹ SACEP Plastic Free Rivers and Seas for South Asia, Labor Management Procedures, 27 October, 2020, accessed at: <https://documents1.worldbank.org/curated/en/938031603827809604/text/Labor-Management-Procedures-Plastic-free-Rivers-and-Seas-for-South-Asia-P171269.txt>

