

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 - KILINNOCHCHI

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

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|-------------------------------|---|
| Subproject Title: | Material Recovery Facility -Ariviyalnagar, Kilinochchi 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 No 72, Ponnagar Center, Ariviyalnagar in the Karachchi Pradeshiya Sabha area of the Kilinochchi district of the Northern Province in Sri Lanka. The site consists of 0.5 Acres 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 land is primarily designated for residential use, surrounded by barren land, and is close to the Faculty of Engineering of the University of Jaffna. In terms of the local community, the area primarily consists of individuals engaged in residential living, small-scale commerce, and agriculture directly surrounding the site. The topography of the land is flat with sandy soil. The area of influence of the site does not contain any protected habitats.

An access road to the site is available. To ensure the facility operates effectively, provisions for water as well as electricity required need to be supplied by the project. The water supply will be sourced from a public water supply and will be used solely for the daily activities of workers, including drinking purposes. No water is required for the operational process.

The site is situated in the dry zone and features a dry climate. Vegetation in the area consists of trees frequently grown in the dry zone. The average annual rainfall in this region is 1325mm and 75% of the rainfall is received from September to December by the North–East monsoon period. The wettest month is November (388 mm)and the driest is March(53mm). The annual temperature varies from 26oC to 30o C. The warmest Month is April (32oC)and the coldest is January (25oC).

The population of Kilinochchi District was 133,000 in 2021 and the total number of families was 41,010.

Coordinates of the location-9°18'31.4"N 80°24'11.9"E

MRF Location map

<https://maps.app.goo.gl/4eXrrPSoxqnwyxSC8>



3. Sub-Project Description and Activities

Facilitating a new MRF

This project involves the construction and establishment of a recyclable plastic collection center with the following components:

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

A grievance Readiness Mechanism will be established to effectively handle and address complaints or concerns raised by stakeholders, employees, or the public regarding the sub-project. 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 construction of the facilities and the operation and take into account the local specificities of the site.

4.1 Construction stage

| Anticipated E&S Risks and Impacts | Risk Mitigation and Management Measures | Impact Mitigation | | Impact/Mitigation Monitoring | | | Mitigation and Monitoring Cost USD |
|--|--|---|--|---|--|---|------------------------------------|
| | | Location/Timing/Frequency | Responsibility | Parameter to be monitored | Methodology, including Location and 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 | # of trees planted. | Monthly Monitoring 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, throughout activity (01 day) | Contractor and the Environmental and Social officer- NRC | 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 | Carry out construction work during day time Implement a Grievance Redress Mechanism / Maintain a public complaint Box | At site/ During excavation and Earthwork, Earth filling and compaction, machine | 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 and Impacts | Risk Mitigation and Management Measures | Impact Mitigation | | Impact/Mitigation Monitoring | | | Mitigation and Monitoring Cost USD |
|--|---|---|----------------|--|---|--|---|
| | | Location/Timing/Frequency | Responsibility | Parameter to be monitored | Methodology, including Location and Frequency | Responsibility * | |
| | <p>Noise levels at the boundary of the Land will be maintained below 75dB(A)</p> <p>Selection of less Noisy Equipment (At least D4 type machines will be used to minimize the noise.</p> | installation, steel works(one to 02 days) | | | | | |
| Solid waste Accumulation | <p>Adopt a construction waste disposal plan</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>Maintaining Daily records</p> | at the site, throughout the activity (01 month) | Contractor | <p>Availability of the plan</p> <p>Evidence for construction waste being sorted</p> | Regular Monitoring Monthly meeting | <p>NRC- E and S Officer</p> <p>Technical Expert(Env't) Country team</p> | Practical measure that does not need additional cost |
| 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 cleaned daily to remove potential mosquito breeding sites.</p> | On site, throughout activity | Contractor | <p>Records of cleaning</p> <p>Evidence of maintenance of channels</p> <p>Evidence for application of repellent</p> | Monthly monitoring | <p>NRC- E and S Officer</p> <p>Technical Expert(Env't) Country team</p> | <p>Costs of repellent 50</p> <p>Cleaning does not need additional cost.</p> |

| Anticipated E&S Risks and Impacts | Risk Mitigation and Management Measures | Impact Mitigation | | Impact/Mitigation Monitoring | | | Mitigation and Monitoring Cost USD |
|---|---|------------------------------|---|---|--|--|------------------------------------|
| | | Location/Timing/Frequency | Responsibility | Parameter to be monitored | Methodology, including Location and Frequency | Responsibility * | |
| | <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> | | | | | | |
| 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 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</p> | On site, throughout activity | Contractor and the Environmental and Social officer | <p>% of workers Wearing PPE during construction activities</p> <p>Availability of First Aid box, Accident Register</p> <p>Daily checking of water accumulated places and cleaning</p> | <p>Regular 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 and Impacts | Risk Mitigation and Management Measures | Impact Mitigation | | Impact/Mitigation Monitoring | | | Mitigation and Monitoring Cost USD |
|---|---|--|--|---|---|---|---|
| | | Location/Timing/Frequency | Responsibility | Parameter to be monitored | Methodology, including Location and Frequency | Responsibility * | |
| | <p>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> | | | | | | |
| Lack of understanding of EHS risks and 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 and awareness will be conducted before the commencement of work</p> <p>Implementation of Focal Points and singing of CoC by the contractor</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</p> | <p>Monthly Monitoring</p> <p>site visit and meeting</p> | <p>Gender focal point of the project</p> <p>Technical Expert(Env't) Country team</p> | 50 (Most measures are practical measures that do not require additional cost) |

| Anticipated E&S Risks and Impacts | Risk Mitigation and Management Measures | Impact Mitigation | | Impact/Mitigation Monitoring | | | Mitigation and Monitoring Cost USD |
|---|---|---|---|---|---|---|------------------------------------|
| | | Location/Timing/Frequency | Responsibility | Parameter to be monitored | Methodology, including Location and Frequency | Responsibility * | |
| | <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 required to sign a Code of Conduct (CoC) including instructions on SEA/SH prevention.</p> <p>Specific and dedicated SEA/SH response mechanism will be provided including referral to SEA/SH services.</p> | at the site during the construction period. | | <p>of visibility material on GRM.</p> <p>Percentage of workers that have signed the CoC</p> | | | |
| 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</p> <p>Gender focal point of the project</p> <p>Technical Expert(Env't) Country team</p> | |

| Anticipated E&S Risks and Impacts | Risk Mitigation and Management Measures | Impact Mitigation | | Impact/Mitigation Monitoring | | | Mitigation and Monitoring Cost USD |
|---|---|--------------------------------------|---|--|---|---|--|
| | | Location/Timing/Frequency | Responsibility | Parameter to be monitored | Methodology, including Location and Frequency | Responsibility * | |
| 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(Env't) Country team and NRC | Cost for GRM (repeating cost) 75 |
| Risk of child labor | <p>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 hiring to ensure adherence to these regulations.</p> <p>The age of workers will be verified with communities where required.</p> | 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(Env't) Country team</p> | Practical measure that does not need additional cost |

| Anticipated E&S Risks and Impacts | Risk Mitigation and Management Measures | Impact Mitigation | | Impact/Mitigation Monitoring | | | Mitigation and Monitoring Cost USD |
|-----------------------------------|---|----------------------------------|---|---|---|---|------------------------------------|
| | | Location/Timing/Frequency | Responsibility | Parameter to be monitored | Methodology, including Location and Frequency | Responsibility * | |
| | 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.) | | | | | | |
| Risk of forced labor | A Workers' GRM will be established, ensuring workers have access to the Project's GRM. Awareness will be raised in communities. | Throughout construction | Contractor | Number of grievances filed in workers' GRM | Monthly monitoring | NRC-E & S officer Technical Expert(Env't) Country team | 75 |
| Lack of stakeholder engagement | 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) Information dissemination channels will be defined for the identified stakeholders and provide sub-project-related information. Consultation channels of the mapped stakeholders will be | Before the commencement of works | Contractor and the Environmental and Social officer - NRC | Availability of stakeholder mapping Number of project information dissemination events Number of consultations with identified stakeholders | Monthly monitoring | Technical Expert(Env't) Country team and NRC | 1000 |

| Anticipated E&S Risks and Impacts | Risk Mitigation and Management Measures | Impact Mitigation | | Impact/Mitigation Monitoring | | | Mitigation and Monitoring Cost USD |
|---|---|--|---|--|---|--|------------------------------------|
| | | Location/Timing/Frequency | Responsibility | Parameter to be monitored | Methodology, including Location and Frequency | Responsibility * | |
| | defined and consultations will be conducted with all stakeholders including on environmental and social risks and mitigation measures. | | | Number of consultations with identified members of vulnerable groups | | | |
| 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>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>Sub-Project Location/Throughout the operational period</p> <p>SEA/SH referral service mapping is to be conducted before the commencement of works</p> <p>Linkages to Project GRM established before the works</p> | Contractor-NRC /Gender focal point of the project | <p>Number of awareness sessions held</p> <p>Number of complaint boxes installed</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> | <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 and Impacts | Risk Mitigation and Management Measures | Impact Mitigation | | Impact/Mitigation Monitoring | | | Mitigation and Monitoring Cost USD |
|-----------------------------------|--|---------------------------|----------------|------------------------------|---|------------------|------------------------------------|
| | | Location/Timing/Frequency | Responsibility | Parameter to be monitored | Methodology, including Location and Frequency | Responsibility * | |
| | 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. | | | | | | |

*** 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 and Impacts | Risk Mitigation and Management Measures | Impact Mitigation | | Impact/Mitigation Monitoring | | | Mitigation and Monitoring Cost USD |
|--|---|----------------------------|----------------|---|--|---|---|
| | | Location/Timing/Frequency | Responsibility | Parameter to be monitored | Methodology, including Location and 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> | 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 (Env't) and NRC</p> | <p>50</p> <p>(Most measures are practical measures that do not require additional cost)</p> |

| Anticipated E&S Risks and Impacts | Risk Mitigation and Management Measures | Impact Mitigation | | Impact/Mitigation Monitoring | | | Mitigation and Monitoring Cost USD |
|--|--|--|----------------------------|---|--|---|--|
| | | Location/Timing/Frequency | Responsibility | Parameter to be monitored | Methodology, including Location and Frequency | Responsibility* | |
| | Surrounding areas will be cleaned daily to remove potential mosquito/vector/pest breeding sites. | | | | | | |
| Oil leakage from the baler machines can result in soil contamination in the surrounding area. | <p>Baler machines will be placed on a concrete floor to prevent oil 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> | At MRF Facility Regularly | MRF Owner, Bailer Operator | <p>Maintenance record of bailer machines</p> <p>Training record for the Bailer operator</p> <p>Number of oil leakage reported</p> | Regular monitoring site visit and checking records | <p>NRC- E and S Officer</p> <p>Technical Expert (Env't) and NRC</p> | Concentrating costs included in the construction (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 and Impacts | Risk Mitigation and Management Measures | Impact Mitigation | | Impact/Mitigation Monitoring | | | Mitigation and Monitoring Cost USD |
|--|---|---|----------------|---|--|--|------------------------------------|
| | | Location/Timing/Frequency | Responsibility | Parameter to be monitored | Methodology, including Location and 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 (Envt) and NRC</p> | 25 |
| OHR risks for workers during operation | <p>Separate sanitary facilities will be provided for male and female workers with 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> | At the MRF Facility, daily | MRF Owner | <p>Availability of adequate sanitary facilities,</p> <p>% of workers that wear appropriate PPE</p> <p>Availability of valid Fire extinguishers,</p> | <p>Regular Monitoring</p> <p>Site visits and checking records</p> <p>visit during the operational period and weekly meetings</p> | <p>NRC- E and S Officer</p> <p>Technical Expert (Envt)</p> | 400 |

| Anticipated E&S Risks and Impacts | Risk Mitigation and Management Measures | Impact Mitigation | | Impact/Mitigation Monitoring | | | Mitigation and Monitoring Cost USD |
|---|---|---|---|--|--|---|------------------------------------|
| | | Location/Timing/Frequency | Responsibility | Parameter to be monitored | Methodology, including Location and Frequency | Responsibility* | |
| | <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>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. 2 of ER)</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>Medical check-ups records</p> | | | |
| Risks of Sexual exploitation and abuse (SEA) and sexual harassment (SH) among workers and between | A Workers' Grievance Redress Mechanism (GRM) will be established to address and resolve workers' complaints and grievances in a timely and transparent manner. | At the MRF Facility, Throughout the operation | Contractor and the Environmental and Social officer | Availability of workers' GRM and SEA/SH Focal Points | <p>Site visits and checking records</p> <p>One visit during the operational period</p> | NRC- E and S Officer Gender focal point of the project | 150 |

| Anticipated E&S Risks and Impacts | Risk Mitigation and Management Measures | Impact Mitigation | | Impact/Mitigation Monitoring | | | Mitigation and Monitoring Cost USD |
|---|--|---------------------------|-----------------------------------|--|---|---------------------------------|------------------------------------|
| | | Location/Timing/Frequency | Responsibility | Parameter to be monitored | Methodology, including Location and Frequency | Responsibility* | |
| workers and community members around the facility | <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> <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> | | Gender focal point of the project | <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> | | Technical Expert (Envt) and NRC | |

| Anticipated E&S Risks and Impacts | Risk Mitigation and Management Measures | Impact Mitigation | | Impact/Mitigation Monitoring | | | Mitigation and Monitoring Cost USD |
|---|--|----------------------------|---|---|--|--|------------------------------------|
| | | Location/Timing/Frequency | Responsibility | Parameter to be monitored | Methodology, including Location and Frequency | Responsibility* | |
| | <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> <p>Workers at the facility will be required to sign a Code of Conduct (CoC).</p> | | | | | | |
| 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, checking of records | Gender specialist - NRC | |
| Non-compliance with the local regulatory requirements and workers' dissatisfaction due to | An LMP will be developed and implemented in line with PLEASE Project LMP and national labor laws. | At the MRF Facility, daily | Facility Manager and HR Officer | Number of workers' grievances filed Payrolls | Monthly Monitoring | Technical Expert(Env't) Country team and NRC | 1550 |

| Anticipated E&S Risks and Impacts | Risk Mitigation and Management Measures | Impact Mitigation | | Impact/Mitigation Monitoring | | | Mitigation and Monitoring Cost USD |
|---|--|----------------------------|-----------------------|--|---|---|------------------------------------|
| | | Location/Timing/Frequency | Responsibility | Parameter to be monitored | Methodology, including Location and Frequency | Responsibility* | |
| extensive work requirements | A workers' GRM will be established. Wages will be paid following prevailing national laws. | | | | | | |
| Risk of child labor at the facility | Recruitment will be conducted in accordance with the minimum age requirements of national laws and the age of workers will be documented upon hiring. The age of workers will be verified with National Identity cards/Birth certificates and communities where required. | At the MRF Facility, daily | Operation Manager-MRF | Number of workers' grievances filed | Monthly monitoring | NRC- E and S Officer Technical Expert (Envt) and NRC | |
| Risk of forced labor | Provide workers' GRM and access to Project GRM. Awareness will be raised within communities regarding the dangers and implications of forced labor. | Throughout operation | Operation Manager-NRC | Number of grievances filed in workers' GRM | Monthly monitoring | NRC- E and S Officer Technical Expert (Envt) and NRC | |
| Gender discrimination in job opportunity and wage | Non-discriminating guidelines will be introduced for recruitment process and operations affecting all levels of workers. | Throughout operation | Operation Manager-NRC | Availability of HR Policy Grievance Redress Mechanism | Monthly monitoring | NRC- E and S Officer Technical Expert (Envt) and NRC | |

| Anticipated E&S Risks and Impacts | Risk Mitigation and Management Measures | Impact Mitigation | | Impact/Mitigation Monitoring | | | Mitigation and Monitoring Cost USD |
|-----------------------------------|--|---------------------------|----------------|------------------------------|---|-----------------|------------------------------------|
| | | Location/Timing/Frequency | Responsibility | Parameter to be monitored | Methodology, including Location and Frequency | Responsibility* | |
| | Equal wages will be ensured for all male and female workers. | | | | | | |

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

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

| | Timeline | | | | | | | | | | | Cost - USD |
|---|----------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|------------|
| | July | Aug | Sep | Oct | Nov | Dec | Jan | Feb | Mar | Apr | May | |
| Site selection, documentation, and approvals | | | | | | | | | | | | 0 |
| Mitigation measures to be implemented during the construction stage, including PPE, sanitary facilities, and waste management | | | | | | | | | | | | 500 |
| Mitigation measures during the operational period for the health, safety, and hygiene of workers. | | | | | | | | | | | | 200 |
| Noise and solid waste management | | | | | | | | | | | | 150 |
| Preparation and displaying of instruction boards | | | | | | | | | | | | 150 |

| | | | | | | | | | | | | |
|---|--|--|--|--|--|--|--|--|--|--|--|------------|
| Fire controls and extinguishes | | | | | | | | | | | | 150 |
| Capacity development and training | | | | | | | | | | | | 100 |
| Workers, community, and stakeholder training, awareness, consultation, and implementation of the Gender Action Plan (GAP) | | | | | | | | | | | | 2550 |
| ESMP Monitoring | | | | | | | | | | | | Staff cost |

7. Attachments

- [1. MRF Kilinochchi Ariviyal Nagar Deed.pdf](#)
- [2. MRF Kilinochchi Ariviyal Nagar _Survey Plan.pdf](#)
- [3. MRF Kilinochchi Ariviyal Nagar _CEA Clearance.pdf](#)
- [4. MRF Kilinochchi Ariviyal Nagar _Agreement. pdf](#)
- [5. MRF Kilinochchi - Project Stakeholder report](#)

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.

[6. 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.

[7. Labor Management Procedure](#)

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>

IV. Review & Approval

NEGOMBO RECYCLING CLUB (PRIVATE) LIMITED
PV 00262718


.....
Managing Director
NISHANTHA PERERA

Prepared By:(Signature)

Position: **Date :** 01 .01. 2025

Reviewed By:



.....(Signature)

Sarojinie Jayasekara

Position: Technical expert - Environment of
the Country Team

Date 01 .01. 2025

Approved By



Position: Environment and Social Development
Specialist. SACEP

Date: 21 .01. 2025