

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 -
TRINCOMALEE

GRANTEE: NEGOMBO RECYCLING CLUB PVT LTD - SRI LANKA

Implemented by:



Supported by:



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Environmental and Social Management Plan (ESMP)

Building a Blue Lanka by Uplifting Communities - BLUECAP

1. Subproject Information

Subproject Title:	Material Recovery Facility – Kumpirupitiy, Kuchchaveli
Estimated Cost:	19,175 USD
Start/Completion Date:	01.01.2025-31.05.2025

2. Site/Location Description

The proposed Material Recovery Facility (MRF) site is located at No - 11, Word No - 05, Vipulananda Kiramam, Kumpurupitiy, Kuchchaveli. in Kuchchaveli Local Authority area in Trincomalee district of the Eastern 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 characterized by a mixed residential land use pattern, with a combination of different types of housing and community spaces. In terms of the local community, the area primarily consists of individuals engaged in residential living, small-scale commerce, and agriculture. An access road to the site is available to ensure the facility operates effectively. The project needs to establish provisions for water and electricity supply. The water supply will be sourced from the public water supply and used solely for the workers' consumption and daily needs. No water will be used in the operational process.

The site is situated in the dry zone, and the surrounding vegetation consists of home gardens with trees that thrive in arid conditions. One Buddhist temple and the beach are located within a 1 Km radius of the site. The area of influence of the site does not contain any protected habitats.

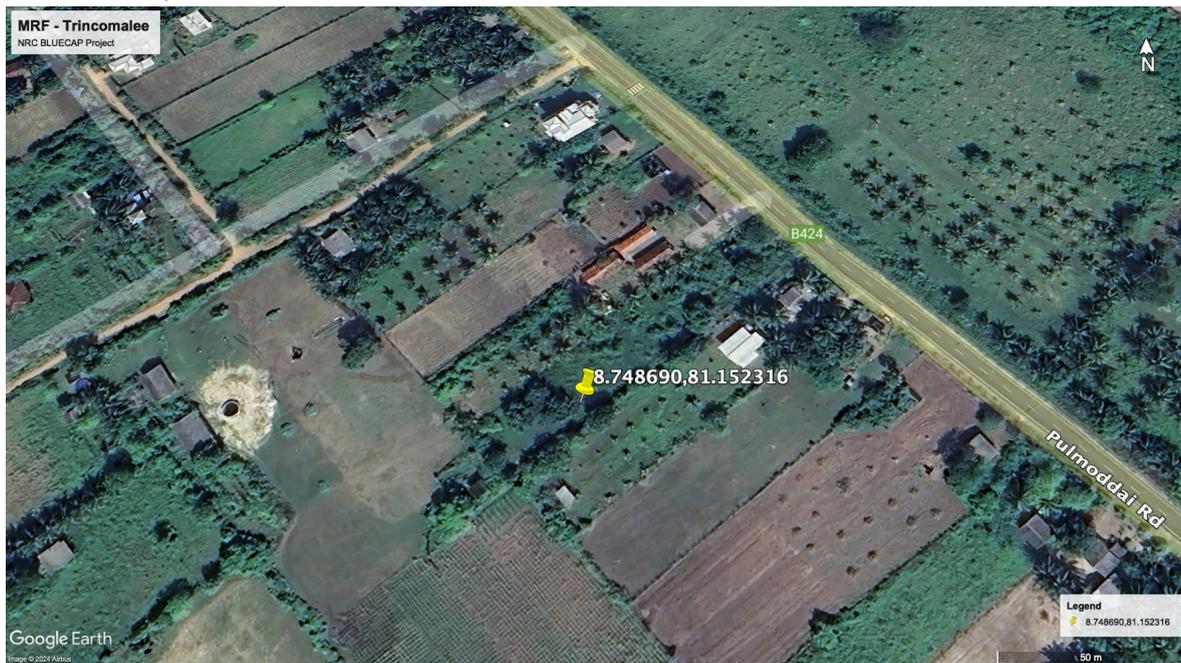
It receives an annual precipitation of 1,569 mm, with December being the wettest month, averaging 341 mm of rainfall. The temperature ranges from 26 °C to 31 °C throughout the year. The hottest month is June, while the coldest month is January. There is a noticeable variation in temperature between day and night, influenced by the intense sunshine during the day and the cooling ocean winds at night, as the Indian Ocean borders the district.

The project is located in Trincomalee District. The District had a population of 441,000 in 2021 and the total number of families was 28,945.

The coordinates of the location are as follows:

8°44'55.3"N 81°09'08.3"E

Location Map



<https://goo.gl/maps/J64HNSudj5sT2fqbA>

3. Subproject Description and Activities

Facilitating 05 new Women-Owned MRFs

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.

1. Constructing a 20x30 sq. ft. collection center with a concrete floor, a shelter, and metal sheet side covers.
2. Collect recyclable plastic, manually sort it, and bale 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 Trincomalee 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.

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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 laws 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 construction of the facilities and the operation and take into account the local specificities of the respective sites.

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 Photo evidence Site visit	E and S Officer NRC Technical Expert(Envt) Country team	150
Environmental damage due to discharge of wastewater generated during construction.	Construction wastewater will be directed to a pit.	Construction site, throughout construction	Contractor and the Environmental and Social Officer-NRC	Availability of the pit. Checking the practice of water discharge	One site visit during construction and monthly meetings	NRC- E and S Officer Technical Expert(Envt) Country team/NRC	
Public Nuisance due to Noise Pollution during excavation and earthworks, soil compaction, cutting iron bars, and machine installation.	Construction works will be carried out during the 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 works (01 to	Contractor and the Environmental and Social Officer-NRC	Noise measurement records # of grievances received regarding noise	Regular Monitoring One site visit during construction and monthly meetings, Online by the country team/ NRC	NRC- E and S Officer NRC Technical Expert(Envt) 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>Less Noisy Equipment (At least D4-type machines) will be used to minimize the noise</p>	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	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(Envt) Country team</p>	<p>Practical measure that does not need additional cost</p>
Soil and water contamination, along with potential mosquito breeding, is 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>Cleaning records</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 require</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>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(Envt) 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 accessible to the workers on-site.</p>	On site, throughout 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 accumulated places and cleaning</p>	Monthly Monitoring	<p>NRC- E and S Officer</p> <p>Technical Expert(Envt) Country team</p>	<p>Costs of PPE</p> <p>Cost of first aid kits</p> <p>200</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>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>						
Lack of understanding of EHS risks, impacts, and mitigation measures leads to accidents and health impacts	<p>The capacity of the construction company will be assessed 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(Envt) 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>Training and awareness will be conducted before the commencement of work.</p> <p>Implementation of Focal Points and singing of CoC</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>Monthly Monitoring</p> <p>site visit and meeting</p>	<p>Gender focal point of the project</p> <p>Technical Expert(Envt) Country team</p>	50 (Most of the measures are practical and do not incur additional costs)

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>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) including instructions on SEA/SH prevention.</p> <p>Specific and dedicated SEA/SH response mechanisms will be provided including referral to SEA/SH services.</p>	by the contractor at the site during the construction period		<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>			
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</p>	At site	Contractor and the Environmental and Social officer	Availability of meeting records	Regular Monitoring site visitor meeting	NRC- E and S Officer Gender focal point of the project	

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 *	
	diseases and Gender-based violence					Technical Expert(Envt) Country team	
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(Envt) 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(Envt) 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- Gender Officer Technical Expert(Envnt) Country team	Costs of GRM 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.	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	NRC and Technical Expert(Envnt) Country team	Costs of stakeholder meetings 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 *	
	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.			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</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 receiving 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>	E & S Officer NRC Gender focal point of the project Technical Expert (Envt)	GRM Cost 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 *	
	<p>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>						

*** 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	Location/Timing/Frequency	Responsibility	Parameter to be monitored	Methodology, including Location and Frequency	Responsibility*	
<p>Solid waste accumulation during sorting plastic and risk of public nuisance due to open burning</p>	<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>	At the MRF Facility, daily	MRF Owner	<p>Inhouse Waste Management Plan</p> <p>Disposal and dispatching 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>

Anticipated E&S Risks and Impacts	Risk Mitigation and Management Measures	Location/Timing/Frequency	Responsibility	Parameter to be monitored	Methodology, including Location and Frequency	Responsibility*	
	<p>Open burning will be prevented.</p> <p>Surrounding areas will be cleaned daily to remove potential mosquito/vector/pest breeding sites.</p>						
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 baler machines</p> <p>Training record for the Bailer operator</p> <p>Number of oil leaks reported</p>	Regular monitoring, site visits, and checking of records	NRC- E and S Officer Technical Expert (Envt) and NRC	Constructing cost included in the construction (5x5 ft cost 112)
Noise generation during the bailing process 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	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 reduced 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	NRC- E and S Officer Technical Expert (Envt) and NRC	25
OHS risks for workers during operations	<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</p>	NRC- E and S Officer Technical Expert (Envt)	400

Anticipated E&S Risks and Impacts	Risk Mitigation and Management Measures	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>A 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-up records</p>	<p>weekly meetings</p>		

<p>Risks of Sexual exploitation and abuse (SEA) and sexual harassment (SH) among workers and between workers and community members at the facility</p>	<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> <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>At the MRF Facility, Throughout the operation</p>	<p>Contractor and the Environmental and Social officer Gender focal point of the project</p>	<p>Availability of workers' GRM and SEA/SH Focal Points</p> <p>Availability of the 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 (Envvt) and NRC</p>	<p>150</p>
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Anticipated E&S Risks and Impacts	Risk Mitigation and Management Measures	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>Prepare a Code of Conduct for workers at the facility that includes reference to SEA/SH.</p> <p>Ensure workers at the facility 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 of 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 the 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	Number of workers' grievances filed Payrolls	Monthly Monitoring	Technical Expert(Envnt) Country team and NRC	1550

Anticipated E&S Risks and Impacts	Risk Mitigation and Management Measures	Location/Timing/Frequency	Responsibility	Parameter to be monitored	Methodology, including Location and 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 workers' ages will be verified with national identity cards/birth certificates and community certificates where required.</p>	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	<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	NRC- E and S Officer Technical Expert (Envt) and NRC	
Gender discrimination in job opportunities and wage	<p>Non-discriminating guidelines will be 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>	Throughout operation	Operation Manager-NRC	Availability of HR Policy Grievance Redress Mechanism	Monthly monitoring	NRC- E and S Officer Technical Expert (Envt) and NRC	

*** Overall monitoring and supervision of the implementation of ESMP will be done by the PIU and UNOPS teams.**

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 the Community and workers
05. Training on Machine operations and operational procedures of sorting, housekeeping, environmental protection, and waste management for the 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 extinguishers												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 Trinco Kumpurupiddy _Deed.pdf](#)
- [2. MRF Trinco Kumpurupiddy Survey Plan.pdf](#)
- [3. MRF Trinco Kumpurupiddy CEA approval .pdf](#)
- [4. MRF Trinco Kumpurupiddy Agreement .pdf](#)
- [5. MRF Trinco _Stakeholder consultation report](#)
- [6. 1 Building approval](#)
- [6.2 Building approval - letter](#)

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 Readiness Mechanism](#)

Labor Management Procedures

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

[8. Labour Management Procedure](#)

IV. Review & Approval

NEGOMBO RECYCLING CLUB (PRIVATE) LIMITED
PV 002627



.....
Managing Director
NISHANTHA PERERA

Prepared By:(Signature)
Position: **Date :** 01 .01. 2025

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>

Reviewed By:



.....(Signature)

Sarojinie Jayasekara

Position: Technical expert - Environment of
the Country Team

Date 01 .01.2025



Approved By

Kapila Mahesh Rajapaksha,

Position: Environment and Social Development
Specialist. SACEP

Date: 21 .01. 2025