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AFRICAN DEVELOPMENT BANK

PROJECT: WESTERN CORRIDOR PROJECT - MUTANDA-KAOMA TOLL ROAD (371 KM)

SAP CODE: P-ZM-DB0-006 COUNTRY: Zambia

ESMS ASSESSMENT REPORT

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SUMMARY

LIST OF ACRONYMS

AfDB	African Development Bank
BAP	Biodiversity Action Plan
BHL	Buks Haulage Limited
CSR	Corporate Social Responsibility
E&S	Environmental and Social
ESAP	Environmental and Social Action Plan
ESG	Environmental and Social Governance
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMPs	Environmental and Social Management Procedures
ESMS	Environmental and Social Management System
ESP	Environmental Social Policy
ISS	Integrated Safeguards System
GBV	Gender Based Violence
HSE	Health, Safety and Environment
HSE IMS	Health, Safety and Environment Integrated Management System
NRI	Not-recordable injuries
PPP	Public-Private Partnership
SEAH	Sexual Exploitation Abuse and Harassment
SEP	Stakeholder Engagement Plan
SCA	Safety Competence Assessment
SNSC	Environmental and Social Safeguards and Compliance Department
SPV	Special Purpose Vehicle
WCL	Western Corridor Limited

1. PROJECT DESCRIPTION

The Government of the Republic of Zambia (GRZ) has entered into a concession agreement with Western Corridor Limited (WCL), a concessionaire for the rehabilitation and upgrading of the 371 km Mutanda to Kaoma Road, also known as the Western Corridor ("the Road"), to international bituminous standards. This Project will be executed under a Public-Private Partnership (PPP) financing model. WCL, a Special Purpose Vehicle (SPV), has been established to oversee the construction and management of this key transport route linking Mutanda, via Kasempa, to Kaoma. The initiative aims to improve logistics and trade by addressing the challenges posed by the existing Road infrastructure.

In alignment with the PPP framework, the WCL brings together public and private stakeholders, including Beefco Holdings Limited, First Quantum Minerals Operations Limited, Engiage (Pty) Limited, and the Road Development Agency (RDA). The Project spans 25 years, consisting of a 2-year construction phase followed by 23 years of operations and maintenance. The upgraded Road would be transferred to the government at the end of the concession period, ensuring its long-term sustainability and integration into Zambia's national transport system.

The proposed rehabilitation and construction of the 371 km road, which crosses the North-Western and Western Provinces, would be carried out in two sections:

- Section 1: Mutanda to Kasempa (150 km)
- Section 2: Kasempa to Kaoma (221 km)

The construction and rehabilitation of the 371 km road will be implemented in two Sections: Section 1 would cover Mutanda to Kasempa (150 km). Section 2 extends from Kasempa to Kaoma (221 km). The Road consists of a single, bidirectional carriageway with a 2m surfaced and a 0.3m gravel shoulder on either side.

This Project is a crucial component of Zambia's transport network, providing a key link to the Mongu-Sesheke Road and ultimately connecting Zambia to Walvis Bay, thereby enhancing regional trade and economic growth.

Key components of the Project include:

- Toll Plaza Infrastructure: Three Toll Plazas would be constructed to generate revenue and fund ongoing maintenance.
- Weighbridges: Two weighbridges will be constructed to regulate vehicle weight, enforce load limits, and protect the Road from premature wear.
- Bridge Upgrades: The Lalafuta and Chilombo Bridges will be widened and upgraded
- Culvert Replacement: All substandard culverts upgraded to ensure structural integrity and drainage efficiency.
- Auxiliary Facilities: WCL headquarters, administration offices, maintenance yards, and staff villages will be constructed.

2. DEVELOPMENT OBJECTIVES OF PROPOSED FACILITY

The Project is expected to yield substantial economic and social advantages. Around 1,000 job opportunities are anticipated during the construction phase, while ongoing operations and maintenance would offer approximately 250 long-term positions. The new Road would create the quickest link between Zambia's mineral-rich Copperbelt and North-Western Provinces and the West Coast of Africa, boosting regional and international trade. It would act as a gateway for commerce with Angola, Botswana, Namibia, and other countries, promoting economic integration.

Beyond these economic benefits, the Road is expected to spur development in Zambia's Western and North-Western Provinces. It would enhance economic activity by enabling the transportation of goods and services and improving access to markets and social services. Communities along the corridor would also experience enhanced quality of life and health benefits from reduced dust pollution and better access to healthcare services, including hospitals.

Upon completion, this Road would seamlessly integrate with the proposed Lumwana–Kambimba Road, linking Zambia to Kolwezi in the Lualaba Province of the Democratic Republic of the Congo (DRC). This connection would ensure smooth traffic flow from Lumwana to Mutanda and Walvis Bay, Namibia. By linking Kolwezi in the DRC to Walvis Bay via Zambia, the Project establishes the Western Corridor, an essential trade route anticipated to become operational by 2035. This corridor enhances regional connectivity and positions Zambia as a key hub for international trade.

3. PRESENTATION OF PROJECT COMPANY (WESTERN CORRIDOR LIMITED)

Western Corridor Limited (WCL) is the concessionaire responsible for the design, construction, operation, and maintenance of the 371 km Mutanda to Kaoma Toll Road in Western and North Western Provinces of Zambia under a 25-year Public-Private Partnership (PPP) concession.

The concessionaire is being developed by a Special Purpose Vehicle (SPV) and comprises the following parties:

- **BeefCo Holdings Limited (BeefCo)**: BeefCo is affiliated with BHL, a distinguished logistics service provider in Zambia with extensive experience in transporting various commodities across Southern Africa, including Namibia, Botswana, DRC, and South Africa. BHL operates a fleet of over 900 trucks and has been involved in maintaining parts of the Mutanda-Kaoma Road since 2017, demonstrating a deep understanding of the route's potential and challenges. BHL was the entity that submitted the unsolicited proposal to the Government for the Project and was granted Preferred Bidder Status for the PPP Project. Its CEO, Nicolaas Marthinus Jansen van Rensburg (Buks), also serves as CEO and Director for the Project company, as well as BeefCo Holding Limited. BeefCo is a holding company with Nicolaas Marthinus Jansen van Rensburg as the major shareholder.
- **First Quantum Minerals (FQM)**: A major global mining company with significant operations in Zambia, including the Kansanshi and Sentinel copper mines in the North-Western Province. FQM is a key shareholder, committed to infrastructure development, PPP, and economic integration. Crucially, FQM has guaranteed traffic volumes on the road once completed and has committed approximately $30 million in equity towards project development and construction.
- **Engiage (Pty) Limited**: The Project is being managed by Engiage Project Managers, a civil engineering, project and construction management, and infrastructure quantity surveying firm with expertise in large-scale civil engineering infrastructure and PPP projects across Southern Africa. Engiage serves as the Lead Project Managers for the SPV/ Owners Team, with its Group CEO, Chris Dijkstra, being a seasoned civil engineer with extensive experience in projects like the Beitbridge Border Post Upgrade. Chris Dijkstra also serves as a Director for Western Corridor Limited

The Project also draws on a professional team of advisors, including Pangaea Securities (Financial Advisor), Nyeleti Consulting (Lead Civil Engineer), Atvantage Quantity Surveyors (Owners Team building quantity surveyors), Herbert Smith Freehills Kramer (lead legal advisors), May and Co (Zambia legal advisor), Kongiwe Environmental Pty (Lead ESG Consultancy), DH Engineering Consultants (Local ESG Advisor), etc.

4. AFDB E&S RISK CATEGORIZATION AND DISCLOSURE REQUIREMENTS

4.1. E&S Risk Categorization

The project is assigned Category 1 (High-risk) according to the Bank's Integrated Safeguards System (ISS). The categorization was confirmed in SAP and validated in ISTS on 20th October 2025. The proposed construction and operation activities are likely to cause significant adverse environmental and social impacts on a large scale. The road corridor is likely to significantly affect environmental or social components that the Bank and the borrowing country considers sensitive such as ecosystems in the game management areas. The project will also affect a significant number of communities within its proposed corridor. The assigned category resonates with the National environmental legislation of Zambia. The proposed road construction project represents activities which require ESIA studies as per requirements of the Environmental Management Act No 12 of 2011 read together with the Environmental Management (Environmental Impact Assessment) Regulations, S.I. No. 3 of 2026. The Regulations provide guidance on categorization of projects and conduct of the assessments. Regulation 4 stipulates that a developer who intends to undertake a project that is likely to have an adverse effect on the environment shall submit to the Agency either an environmental and social project brief or environmental and social impact statement. Regulation 5(1) states, "A developer who intends to undertake the development of a project under Class I to Class IV set out in the First Schedule shall submit to the Agency an environmental and social impact statement on payment of a fee set out in the Second Schedule". The project falls under Class IH(b): Construction of new roads or major improvements to existing roads passing through ecologically sensitive areas, such as National Parks, National Forests, Wetlands or Game Management Area.

4.2. Disclosure Requirements

WCL has undertaken the following assessments:

- Environmental and Social Impact Assessment (ESIA) approved by Zambia Environment Management Authority (ZEMA) in 2025.
- Resettlement Action Plan (RAP) for the Early works.
- Supplementary Studies: including Biodiversity Action Plan (BAP) and Emergency Response and Preparedness Plan (ERPP).

In addition to the above safeguard documents as part of the due diligence process requirement under the Bank's ISS, the client is also required to to provide its ESMS components, with (i) a high-level E&S policy statement approved by the company senior management; (ii) existing E&S management procedures; (iii) institutional capacity including existence of clear E&S unit, skilled and appropriate staffing, sustainable financing; and (iv) an adequate Environmental and Social Governance (ESG) of the organization to implement the ESMS as well as comply with the Bank's ISS and national legislation. The client is required also to prepare and disclose the ESMP mandatorily annexed to the Financing Agreement (FA). The required safeguards documents will be disclosed in country by the client and by the Bank for at least 120 days before Board presentation of the Project. At the moment, the client has disclosed the ESIA report and Environment and Social Policy (ESP), which have also been disclosed by the Bank on 06th March, 2026.

5. SCOPE OF THE ESMS ASSESSMENT

To manage the potential E&S risks and impacts, WCL has developed an environmental and social management system (ESMS) which has to be assessed to ensure its effectiveness in managing and monitoring E&S risks and impacts. The Safeguards and Compliance Department (SNSC) of the African Development Bank (AfDB) assessed the WCL ESMS components. The purpose of this assessment is to ensure compliance with the requirements of the Bank's Integrated Safeguards System (ISS) and the country-specific laws and regulations. This assessment focused on the four key pillars of an ESMS used for identifying and managing E&S risks and impacts, including monitoring and reporting as defined by the AfDB. These key pillars include:

i) E&S policy statement approved by the company's senior management
ii) The existence of E&S Management Procedures (to identify, classify and manage WCL's E&S aspects, including its corporate social responsibility);
iii) Institutional capacity (existence of a clear E&S unit/function) in the company's organization chart, including: (i) competent and sufficient staff commensurate with the E&S challenges, and (ii) an adequate permanent budget line for the operation of the E&S unit/function;
iv) Environmental and social governance (ESG) of the organization: level of independence of the E&S Unit/Function (particularly with regard to other units and teams that manage activities that generate risks and impacts) in technical decision-making (Reporting line in the organization chart). Publication of annual ESMS implementation or ESG reports; track records in E&S grievance handling; track records in environment-occupational-health-safety (EOHS) incidents/accidents and performance in their management, etc.

6. FINDINGS OF THE ASSESSMENT

6.1. High-level E&S statement policy

WCL has an environmental and social policy dated 20th March 2025 signed by the WCL Project Manager and the ESG Director – Engiage Project Managers. The policy applies to all WCL activities including planning, construction, operation and maintenance as well as to all contractors, subcontractors, and partners engaged in the project. It defines the respective environmental and social policy principles including adherence to all relevant Zambian environmental laws, policies, regulations and international standards. The policy is implemented through establishment and maintenance of an environmental and social management system, capacity building, monitoring and reporting, and continuous improvement. The WCL Board and senior management are responsible for effective implementation of the policy, and all employees, contractors and partners are expected to uphold their principles and contribute to the project environmental and social objectives. In addition to the overarching E&S policy, WCL also has a Corporate Social Responsibility policy and Anti-Bribery and Corruption Policy.

The policy has the following environmental principles: (i) **Compliance;** adhere to all applicable Zambian Environmental Laws, regulations, and international standards, including the IFC Performance Standards and World Bank Environmental, Health and Safety Guidelines (ii) **Pollution Prevention;** Minimise emissions, effluent and waste generation and implement measures to prevent soil, water and air pollution (iii) **Resource Efficiency**; promote efficient use of energy, water and material. Encourage recycling and reuse whenever possible (iv) **Biodiversity Protection;** avoid, minimize or restore impacts on natural habitats and biodiversity, especially in sensitive areas such as the Kasonso Busanga GMA (v), climate change, integrate climate resilience and adaptation measures into project design and operations to mitigate the impacts of climate change.

The policy has the following social principles: **(i) Respect for Human Rights**; Uphold the rights and dignity of all individuals affected by the project, with special attention to vulnerable groups (**ii) Stakeholder Engagement;** ensure transparent, inclusive and ongoing consultation with all stakeholders, including project affected persons (PAPS), Local communities and government authorities (**iii) Land Acquisition and Resettlement**; Manage land acquisition and resettlement in line with national laws and international best practices, ensuring fair compensation, livelihood restoration, and minimal disruption (**iv) Community Health and Safety**; identify and mitigate risks to community health and safety arising from project activities. **(v) Labour and Working Conditions;** provide safe, fair and non-discriminatory working conditions for all workers, including contractors and subcontractors (**vi) Grievance Mechanism;** maintain accessible and effective grievance redress mechanisms for communities and workers to raise concerns and seek resolution.

Although the E&S policies have been signed off by the WCL Project Manager and the E&S Director – Engiage Project Managers, the ESMS indicates that approval of the policies is the responsibility of the WCL Board. Therefore, they will require Board approval.

The E&S policy however, has not included social policy principles specifically on Gender Based Violence (GBV), Sexual Exploitation Abuse and Harassment (SEAH) and cultural heritage.

6.2. Corporate Social Responsibility strategy

WCL has a Corporate Social Responsibility policy dated 9th March 2026 signed by the WCL Project Manager and the E&S Director – Engiage Project Managers. WCL acknowledges the fact that it operates in one of Zambia's most socially and ecologically sensitive regions, the project corridor traverses rural subsistence communities, floodplain and wetland ecosystems, and areas of cultural and traditional significance within the Western Province chieftaincy structure. Therefore, the project has the potential to deliver transformative economic and social value to communities along the corridor and equally, to cause harm if community relationships are mismanaged. The WCL Corporate Social Responsibility (CSR) Policy establishes the governing framework for WCL's commitment to responsible business conduct, community investment, and sustainable development across the full project lifecycle. The policy applies to WCL, EPC contractors, Operation and Maintenance contractors, and all activities within the Project Area of Influence (PAI).

WCL is committed to among others creating measurable, lasting social value in Western and North Western Provinces through employment, enterprise development, skills transfer, and targeted community investment. Beyond direct employment and procurement, WCL will invest in community wellbeing through targeted social development initiatives in health, education, livelihoods, and infrastructure. The Policy provides for monitoring, reporting, and continuous improvement. The WCL Board is responsible for approving the CSR Policy and annual CSR budget, and ultimate accountability for policy compliance.

6.3. E&S Management Procedures

WCL has an ESMS Structure and Architecture Document dated 1st August 2025 and approved by the WCL Project Manager and the ESG Director – Engiage Project Managers. It is a summary document that describes the elements and processes of WCL's ESMS. It includes the ESMS objectives, scope, legal and regulatory issues, organizational structure and responsibilities, identification and assessment of E&S risks and impacts, training and competency, stakeholder engagement and grievance mechanism, monitoring, reporting and review as well as document management and record keeping.

E&S assessment process: The E&S assessment process follows a systematic approach:

1. Screening: identifying potential E&S issues and applicable standards
2. Scoping: Determine key issues requiring detailed assessments
3. Baseline Studies: Establish environmental and social baseline conditions
4. Impact Assessment: Predict and evaluate significance of impacts
5. Mitigation Design: Develop measures to avoid, minimize, or compensate for impacts
6. Residual Impacts Assessment: Evaluate impacts after mitigation
7. Management Planning: Develop plans and procedures for implementation.

The ESMS is silent on categorization of projects according to E&S risk. This is because the WCL concessionaire was formed specifically for the Mutanda to Kaoma Road project. Therefore, any subprojects under the WCL will be subjected to screening and categorization according to Zambian environmental laws to secure the necessary approvals.

Exclusion List: WCL has a Lender Exclusion List dated 10th March 2026. It identifies activities, investments, and business relationships that WCL and its contractors, subcontractors, and supply chain partners are prohibited from engaging in as a condition of lender participation in the Mutanda to Kaoma Toll Road PPP Concession. The List applies across the full project lifecycle – construction, operations, and maintenance - and covers WCL's own activities as well as those of any entity to which WCL provides financing, subcontracts, or procurement awards.

ABSOLUTE EXCLUSIONS are unconditionally prohibited and constitute an event of default under the Finance Documents if undertaken by WCL or any contractor, subcontractor, or supply chain entity acting on WCL's behalf. No waiver, derogation, or lender consent can authorise these activities.

CONDITIONAL EXCLUSIONS (SUBJECT TO LENDER APPROVAL) activities are not permitted unless WCL obtains prior written consent from the lender E&S team and demonstrates compliance with applicable IFC Performance Standards and national law. These are not automatic exclusions but require a formal E&S assessment and lender sign-off before proceeding.

PROJECT-SPECIFIC EXCLUSIONS: In addition to the standard lender exclusions above, the following activities are specifically prohibited given the ecological, social, and political context of the Mutanda–Kaoma corridor: An example is any construction or site clearance activities that disturb, encroach upon, or drain Barotse floodplain wetlands beyond the approved project footprint.

The Exclusion List applies to WCL's full supply chain. The WCL Management Team is responsible for monitoring compliance with this Exclusion List across WCL's operations and contractor activities.

Overall Framework: The management framework consists of:

- Overarching Policies: High level commitments and principles
- Management Plans: Strategic approaches to specific E&S topic
- Procedures: Step by step operational guidance
- Standards and Specification: Technical requirements.
- Forms and Templates: Tools for implementation and record keeping.

Management Procedures and Codes: WCL is developed codes and procedures for E&S management namely:

- Code of Conduct
- Community H&S Management Procedure
- Labour Management Procedure
- Air Emission and Greenhouse Gas (GHG) Management Procedures
- Water Use Management Procedures
- Waste and Wastewater Management Procedures
- Soil Management Procedure
- Biodiversity Management Procedures

- Noise Management Procedures
- Hazardous Substance Management Procedure
- Health and Safety Management Procedure
- Land Acquisition Procedure
- Child Labor Policy and Prevention Procedure
- CSR Development Procedure

Management Plans: WCL developed the management plans for E&S management namely:

- Emergency Preparedness and Response Plan
- Biodiversity Management Plan
- Alien Invasive Management Plan
- Resource Efficiency and Pollution Prevention Plan
- Rehabilitation Plan
- Resettlement Framework and Action Plan
- Gender Based Violence Action Plan HIV/AIDS Management Plan
- Cultural Heritage Management Procedure/ Plan

The client should develop an Occupational Health and Safety (OSH) Plan that includes measures for managing and reporting any incidents. The Health and Safety Management Procedure will operationalize the OSH Plan.

The Bank reviewed and cleared the ESIA report that was disclosed on the Bank's website on 6th March, 2026. However, the Bank has reviewed but not cleared the EPRP, BAP, and RAP for Early works. The Stakeholder Management Plan has not yet been submitted for the Bank's review as well. The other management plans indicated in the ESMS although not required for Bank review should be prepared and finalized to guide management of the relevant E&S risks and impacts. All plans and procedures listed in the ESMS Structure and Architecture Document should be finalized during the mobilization period before commencement of works.

Monitoring and Review: Regulation 18 (1) of The Environmental Management (Environmental Impact Assessment) Regulations, 2026 requires a developer to audit, monitor and evaluate the significant environmental risks and opportunities arising from the implementation of a project for which an environmental impact assessment was approved. WCL has established a comprehensive E&S monitoring program to track performance, verify compliance, and identify areas for improvement. The ESMS is subject to regular management review to ensure its continuing suitability, adequacy, and effectiveness. WCL will monitor contractor E&S performance through:

- Weekly site inspections
- Monthly E&S performance reviews
- Quarterly E&S audits
- Review of contractor E&S reports
- Community feedback and grievances
- Deliver toolbox talks and site inductions
- Report E&S incidents and non-compliances

6.4. Institutional capacity in the company's organogram

6.4.1. Existence of E&S unit, skilled and appropriate staffing

E&S management is integrated into WCL's overall governance structure, with clear accountability from the Board level down to site operations. WCL Board of Directors have the ultimate accountability for E&S performance and quarterly review of E&S performance. Executive Management provides strategic direction and resources for ESMS implementation. Project Manager has overall responsibility for ESMS implementation and performance. E&S Management Team is responsible for day-to-day implementation, monitoring, and reporting. Site Management team is responsible for implementation of E&S measures at operational level.

WCL has a well-structured organizational chart that is clearly capable of enabling effective management of E&S risks and impacts. The team is headed by the ECO/HS (E&S Director) working closely with the Project Manager. Below the ECO/HS is the E&S Specialist Team for Kongiwe. The Community Liaison Officer (CLO) and E&S Manager report to the ECO/HS. There are respective Health Safety Environment and Social (HSES) officers for Lot 1, Lot 2&3a and Lot 3b&4 who will report to the E&S Manager. Health Safety Environmental and Social Officers will be appointed for each Lot - details to be shared once appointed. HSES officer will oversee EPC

Contractors and will report to E&S Manager. Each EPC Contractor will have their E&S team who will report to the respective HSES officers.

Section 7.2 of the ESMS provides for the position of a Health and Safety Manager with roles and responsibilities defined and assigned. However, the position is not reflected on E&S organogram attached to the ESMS.

Though the staffing provided in the ESMS is adequate to manage the E & S risks for the project, however, the client should provide for an experienced Gender Management Officer who will be responsible for GBV, SEAH at the company and will report to the E & S Manager. The company should also provide for a Labour Management officer who will be responsible for managing labour, working conditions, and recruitment issues. The HSES officer position has combined the management of both environmental and social risks. The workload will be huge for the officers especially during construction. The Bank recommends that HSES officer is split into two positions i.e., HSE Officer and the Social Officer to ensure effective E&S management.

Contractors are required to:

- Appoint qualified E&S personnel (minimum 1 E & S Officer per major contract)
- Develop and implement Contractor E&S Management Plans aligned with WCL ESMS
- Comply with all WCL E&S procedures and requirements
- Participate in E&S training and induction programs
- Report E&S incidents and performance data
- Implement corrective actions for non-compliances

For environmental and social aspects, the Project has engaged Kongiwe Environmental (Pty) Ltd and DH Engineering Consultants ("DH"). Kongiwe Environmental (Pty) Ltd, based in South Africa, prepared the "Resettlement Policy Framework" (RPF) for the concession. Key personnel include Rene Ford (Author), Grant Cornish-Bowden and Danny Holmes (Reviewers), with Chris Dijkstra (Concessionaire) also reviewing and approving the reports.

DH Engineering Consultants is a local Zambian ESG Advisor. It is a Zambian-owned firm specialising in Electrical, Mechanical, Water, and Sanitation Engineering design solutions and project management, as well as Environmental Engineering solutions, including Environmental Impact Assessment (EIA) studies. Their team includes Daniel Holmes (Principal Environmental Director, a Chartered Environmental Engineer), Tobias Muyaba (Social/Economic Director with expertise in social/economic impact assessment and community engagement), Jacob Tembo (Ecologist and Flora and Fauna Expert), and other Environmental Officers and Engineers like Martin Lorenz and Bernadette Chola.

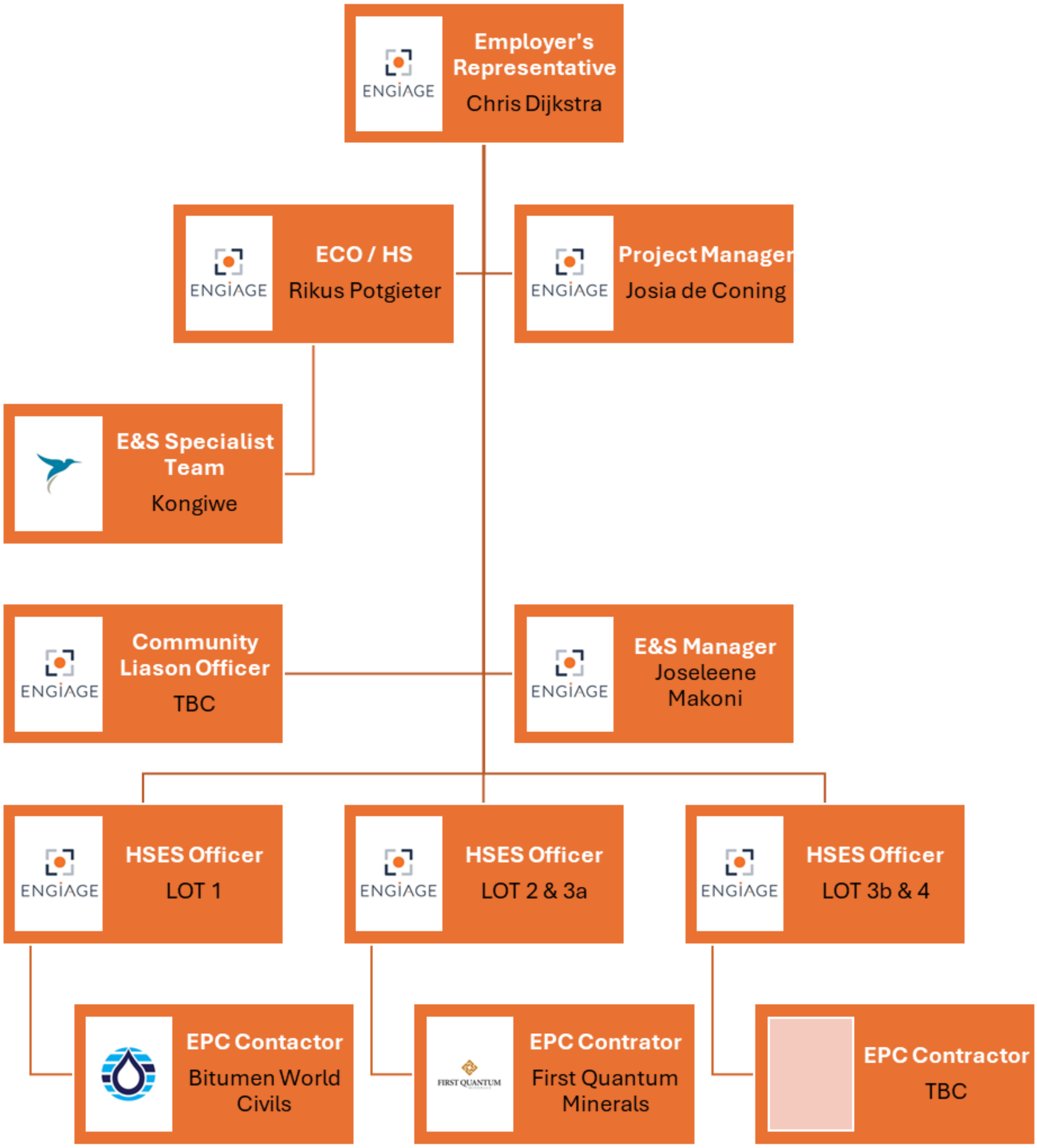

Figure 1: WCL E&S Organogram

6.4.2. Adequate sustainable financing (permanent budget line) for the operation of the E&S unit/function

The information shared with the bank does not provide evidence of budget availability for the ESG unit for ESMS implementation.

6.5. Environmental and Social Governance (ESG) of WCL

Level of independence of the E&S Unit/Function: The ESG unit will be headed by the ECO/HS (E&S Director) working closely (same level) with the Project Manager with both reporting directly to the Employer's Representative. It is expected to be independent in technical decision-making.

Track records in E&S grievance handling: The ESMS provides for grievance redress for both community and workers grievances. The GRM process includes Submission, Registration, Acknowledgement, Assessment, Investigation, Resolution, Implementation, Closure and Escalation. There is need to clearly elaborate the composition of different grievance management committees at different levels and the referral pathway. This information is equally expected in the Stakeholder Engagement Plan (SEP). Nevertheless, grievances have been managed during the RAP process.

The ESMS provides for a separate Internal Grievance Management Procedures that has been established for project workers (WCL employees and contractor personnel) to raise concerns related to working conditions and safety, wages and benefits, discrimination or harassment, management practices and contractual issues. There is no information on any labour grievances during the project preparation studies but this will be critical during the construction and operation phases.

Track records in environment-occupational-health-safety (EOHS) incidents/accidents and performance: No information available. Incidents are expected during the construction and operation phases. The Emergency Preparedness and Response Plan provides for incident investigation and reporting. No reports at this stage of project preparation.

Publication of annual ESMS implementation or ESG reports: WCL is a new entity, no E&S reporting has been done to date. However, all policies and the ESMS provide for monitoring and reporting.

Annual ESMS Review: The ESMS provides for comprehensive review of all E&S and management measures and updated risk assessments to be documented and communicated to relevant personnel and stakeholders. No ESMS reviews have been done, the ESMS is still under development.

7. SCOPE FOR IMPROVEMENT

The areas for improvement of the draft ESMS have been identified and are presented below in an Environmental and Social Action Plan to be implemented within agreed timelines with the company.

Table 1: Environmental and Social Action Plan (ESAP)

Issue	Proposed measures	Deliverables/Indicators	Deadline for completion
E&S policies	• Integrate GBV, SEAH and cultural heritage into the E&S policy (social policy principles) • All ESMS policies (E&S, CSR, health and safety) should be signed off by the WCL Board.	GBV, SEAH and cultural heritage aspects integrated into the E&S policy All ESMS policies signed by WCL Board	Before commencement of construction period
Identification of risks and impacts	• Incorporate E&S risk control measures in the contractor and supplier agreements and contracts and include defined performance indicators aligned with the WCL ESMS.	WCL E&S risk management integrated along the supply chain	Before commencement of construction period and throughout operation
Regulatory compliance	• Develop and periodically maintain a WCL Legal Obligations Register • Develop a list of licenses, permits and approvals required for all project implementation phases in compliance with Zambian laws	• Approved Legal Obligations Register • List of permits, licenses and approvals	Before commencement of construction period
E&S Management procedures	• Develop an Occupational Health and Safety (OSH) Plan that includes measures for managing and reporting any incidents • Develop E&S Risk Assessment procedures and tools • Finalize all E&S management plans and implementation procedures listed in WCL ESMS • All EPC contractors to prepare Construction ESMPs for their respective scope of work	• OSH Plan approved by WCL Board • E&S procedures and management plans approved by WCL Board/ E&S Director • EPC Contractor ESMPs approved by WCL	Before commencement of construction period
Organizational capacity	• Include in the organogram the position of a Health and Safety Manager, Gender Management	HSES recruitment requirements defined and all ESG unit staff recruited,	Before mobilization for construction

Issue	Proposed measures	Deliverables/Indicators	Deadline for completion
	officer and Labour Management officer • Define minimum qualifications for HSES officers • Fill all ESG vacancies (HSES officers, Contractor E&S staff) • Develop a training program to ensure that all staff understand the ESMS elements that are relevant to their roles and how to implement new or improved procedures.	inducted and periodically trained	
ESG budget	• Develop a budget for management of E&S risks (due diligence, monitoring, reporting, training)	Approved ESMP implementation budget	Before mobilization for construction
Grievance handling	• Elaborate a clear referral path for grievance management • Define the composition of the different grievance management committees • Select and train grievance management committees • Public disclosure of GRM	Functional Grievance Redress System disclosed to the public	During project preparation studies (RAP, etc.)
ESG Reporting	• Undertake monthly E&S monitoring and reporting. • Communicate and disclose information to affected communities • Publish annual ESG reports on the Company website	Monthly E&S monitoring reporting templates and reports	Continuous throughout all project phases
ESG Implementation records	• Maintain ESG records (meetings, inspections, OSH, grievances, etc.)	ESG records database/ SharePoint	Continuous throughout all project phases
ESMS Monitoring and Review	• Formulate E&S performance targets and indicators. • Define a procedure and evaluation criteria for ESMS internal audits. • Hold senior management review meetings to evaluate the WCL's ESMS performance. • Review the effectiveness of ESMS documents regularly (at least annually) or whenever WCL operations change significantly	Annual ESMS Reviews completed	Continuous throughout all project phases

8. CONCLUSION

The assessment shows that WCL has established an ESMS with a framework for identifying, managing, and monitoring E&S risks and impacts for the proposed road project. The assessment concludes that the WCL's ESMS is rated as Good. Recommendations are presented in section 7 above to ensure that the ESMS is finalized and fully implemented during the current preparation activities and throughout the construction and operation phases.