

World Bank-financed

China Plastic Waste Reduction Project (Shaanxi)

**Consolidated Labor Management Procedure for
the Batch 1 Subprojects**

**Foreign Loan Project Management Office of Shaanxi
Province
November 2022**

User's Guide and Executive Summary

The Batch 1 subprojects include activities implemented by Linwei District, Chengcheng County, Chencang District and Baoji City, and each region involves six project implementation units (PIUs) and relevant township governments and village committees (in the project areas) at the construction and operation stages. Due to the similarity of project activities in the 3 counties / districts and one city, this consolidated labor management procedure (LMP) has been prepared for the Batch 1 subprojects to reduce repetition and facilitate the Bank review and clearance. This LMP is developed generally based on the Bank's labor management procedure template and the LMP framework (LMPF) in the ESMF. Having a comprehensive analysis of the labor risks and impact of the Batch 1 subprojects, it also highlights differences in terms of labor management practices, risks and impacts of different counties / districts, different project activities and different stages of relevant subproject activities and facilities. This LMP covers the applicable domestic laws and regulations, labor management policies of the project management offices (PMOs) and PIUs, and enhanced measures required to comply with Environment and Social Standard 2 (ESS2).

The Foreign Loan Project Management Office of Shaanxi Province (hereafter as "Shaanxi PMO"), Baoji City PMO, 3 county / district PMOs and PIUs have been consulted on this LMP, and a consensus reached. During project implementation, the PMOs at various levels will assign dedicated staff to provide direction and supervision, and the PMOs shall, or shall PIUs to, assign dedicated departments and staff and allocate adequate resources to implement this LMP.

After Bank review of this LMP, the Shaanxi PMO will split this LMP by PIU with the assistance of the external social specialist, and **each PIU will have a separate LMP**. The Shaanxi PMO will organize trainings on how to implement the measures and actions in these LMPs for the PMOs, PIUs, contractors and different types of workers. As a key aspect of external social monitoring, the Shaanxi PMO will appoint an independent external social consultant to monitor LMP implementation and conduct adaptive adjustment based on changes in labor risks of the Batch 1 subprojects.

The PIUs will manage all types of workers as per this LMP during project implementation. The city / county / district PMOs will cause the PIUs to implement this LMP, include labor management requirements for contracted workers in the bidding documents, monitor LMP implementation, and report labor performance to the Shaanxi PMO regularly.

Direct workers involved in the Project are those employed directly by the PMO/PIUs to work specifically in relation to the project, including waste cleaners, transfer workers and facility O&M workers, etc. For the gaps in the management of direct workers (labor contract, labor remuneration, working hours and

occupational health and safety (OHS), etc.) identified in the social audit and social impact assessment (SIA), the PIUs should first improve their relevant policies and procedures, and organizational setup as per this LMP, strengthen labor contract management, ensure that salaries of sanitation workers are not lower than the prevailing minimum salary standard of Shaanxi Province, and arrange days off flexibly; for the waste transfer stations (WTSs) and landfill closure, they should screen and test workplace occupational health hazards, and provide occupational health checkups to workers potentially exposed to occupational hazards per the domestic regulations.

Contracted workers mainly include contracted workers responsible for facility construction, equipment installation, landfill closure, front end rural waste collection and transfer in towns or townships, leachate treatment and biogas power generation for waste landslides, etc. For the management of contracted workers, the social audit finds that the PIUs have not established a procedure to manage and monitor third party (contractor) labor performance, and there is no nonconformity remedy in relevant contracts. Therefore, the PIUs should improve policies and procedures for contracted worker management as per this LMP, strengthen the labor management of contractors and third-party service providers, define contractor's labor management requirements in the bidding documents, and set out relevant provisions in contracts. During project implementation, monitoring and management will be strengthened to ensure that third parties protect the rights of contracted workers as per the specified requirements.

Community workers are mainly rural cleaners and transfer workers in villages of Linwei District, Chengcheng County and Chencang District. Most of them are public welfare positions and are registered low income residents. Social audit and SIA found that village committees have not signed a labor contract with community workers, and not covered personal accident insurance for them. Some village committees have not provided safety training and personal protection equipment (PPE), and their grievance redress channels are limited. Therefore, labor contract management should be strengthened, personal accident insurance covered, safety training offered, sufficient PPE distributed regularly, and an escalating GRM (village committee—township government—county / district environmental sanitation authority)¹ established.

For the above 3 types of workers, the measures and actions for labor contract management, working hours, labor remuneration, OHS risk management, GRM, policy and procedure improvement, clarification of responsibilities and resources of related agencies will be included in the Environmental and Social Commitment Plan (ESCP). During project implementation, the external social consultant appointed by

¹ The PIUs of the 3 counties / districts are the Linwei District ESC, Chengcheng County ESC, and Chencang District Waste Management Service Center.

the Shaanxi PMO will conduct external monitoring semiannually, and report to the Bank regularly. As part of the external social monitoring, the social monitor will also submit a report to confirm that the gaps, specified in the labor audit and the social assessment, have been appropriately filled, consistent with China's Labor Law, Labor Contract Law and ESS2.

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Acronyms

EHSGs	World Bank's Environment, Health and Safety Guidelines
ESCP	Environmental and Social Commitment Plan
ESSs	Environmental and Social Standards
ESC	Environmental Sanitation Center
GRM	Grievance Redress Mechanism
GIIP	Good International Industrial Practice
LMP	Labor Management Procedure
LMPF	Labor Management Procedure Framework
OHS	Occupational Health and Safety
O&M	Operation and Maintenance
PIU	Project Implementation Unit
PMO	Project Management Office
PRC	People's Republic of China
SIA	Social Impact Assessment
SWMC	Solid Waste Management Center
WTS	Waste Transfer Station

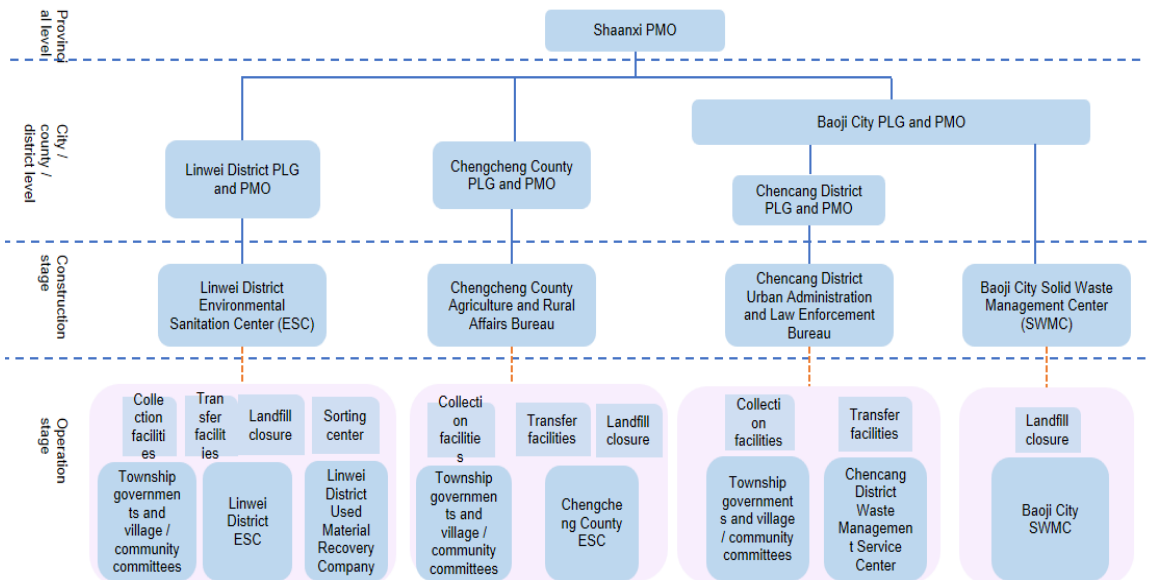
1. Overview

The Batch 1 subprojects of China Plastic Waste Reduction Project (Shaanxi) (hereinafter, the “Project”) include the subprojects in Linwei District, Chengcheng County, Chencang District and Baoji City.

1.1 Project Organization

The agencies responsible for the implementation and labor management of the Batch 1 subprojects include the project management offices (PMOs) and project implementation units (PIUs). The Foreign Loan Project Management Office of Shaanxi Province (hereinafter referred to “Shaanxi PMO”), city / county / district PMOs, and PIUs will assume responsibilities in labor management procedure (LMP) implementation. See Figure 1.

The PIUs are responsible for LMP implementation at the construction and operation stages, including establishing sound grievance redress mechanisms (GRMs) for workers. As part of social risk management, Shaanxi PMO will appoint an experienced external social specialist to offer training on, direct and monitor LMP implementation. The city / county / district PMOs will, or will cause the local PIUs to, implement this LMP, and submit periodic monitoring reports to the Shaanxi PMO² and the World Bank.



² Per the organizational set-up, the PMOs of Linwei District and Chengcheng County (in Weinan City) report to the Shaanxi PMO directly; the Chencang District PMO will report to the Shaanxi PMO through Baoji Municipal PMO.

Figure 1 Organization for labor management of the Batch 1 subprojects

Table 1 PIUs of the Batch 1 subprojects and main types of workers involved

City / county / district	Subproject type	Main activity	Construction stage		Operation stage	
			PIU	Worker type	PIU	Worker type
Linwei District	Collection facilities	Rural: waste collection points and waste bins	Linwei District Environmental Sanitation Center (ESC)	Direct Contracted	Township governments and village committees	Direct Community Contracted
		Urban: waste sorting pavilions and waste bins		Direct Contracted	Linwei District ESC	Direct Community Contracted
	Transfer facilities	Construction / reconstruction of WTSS, and purchase of trucks		Direct Contracted	Linwei District ESC	Direct
	Sorting facilities	Sorting center		Direct Contracted	Linwei District Used Material Recycling Company	Direct
	Disposal facilities	Majiagou Landfill closure		Direct Contracted	Linwei District ESC	Direct Contracted
Chengcheng County	Collection facilities	Purchase of 195 electric collection trucks (including 4 waste bins)	Chengcheng County ESC	Direct Community	Township governments and village committees	Direct Community
	Transfer facilities	Urban WTSS, township WTSS, and trucks		Direct Contracted	Chengcheng County ESC	Direct
	Disposal facilities	Yaotou Landfill closure Chengcheng Landfill closure		Direct Contracted		Direct Contracted
Baoji City	Disposal facilities	Changshougou Landfill closure	Baoji City SWMC	Direct Contracted	Baoji City SWMC	Direct Contracted
Chencang District	Collection facilities	Rural: waste collection points, waste collection sites, and waste bins	Chencang District Urban Administration and Law Enforcement Bureau	Direct Contracted	Township governments and village committees	Direct Community Contracted
		Urban: waste sorting pavilions, waste collection sites, and waste bins		Direct Contracted	Chencang District Waste Management Service Center	Direct Community Contracted
	Transfer facilities	Construction of WTSS, truck maintenance center, and trucks		Direct Contracted	Chencang District Waste Management Service Center	Direct

1.2 Characteristics of project workers

According to the social audit and social impact assessment (SIA), the Batch 1 subprojects mainly engage or involve direct, contracted and community workers, and currently do not involve primary supply workers³. This will be tracked in future project implementation and monitoring.

Table 2 Main types and numbers of workers of the Batch 1 subprojects by facility

City / county / district	Subproject type	Main activity	Construction stage workers		Operation stage workers	
			Type	Number	Type	Number
Linwei District	Collection facilities	Waste collection points, waste sorting pavilions	Direct	4	Direct	2148
			Contracted	30	Contracted	15
			/		Community	3403
	Transfer facilities	Construction / reconstruction of WTSs, and purchase of transfer trucks	Direct	3	Direct	58
			Contracted	41	/	
	Sorting facilities	Sorting center	Direct	2	Direct	24
			Contracted	16	/	
	Disposal facilities	Majiagou Landfill closure	Direct	3	Direct	20
Contracted			47	Contracted	14	
Chengcheng County	Collection facilities	Purchase of 195 electric collection trucks (including 4 waste bins)	/		Direct	651
			/		Community	2608
	Transfer facilities	Urban WTSs, township WTSs, and trucks	Direct	2	Direct	64
			Contracted	31	/	
	Disposal facilities	Yaotou Landfill closure	Direct	3	Direct	8
			Contracted	37	/	
		Chengcheng Landfill closure	Direct	3	Direct	9
			Contracted	47	/	
Baoji City	Disposal facilities	Changshougou Landfill closure	Direct	3	Direct	37
			Contracted	82	Contracted	10
Chencang District	Collection facilities	Waste collection points, waste sorting pavilions, waste collection sites	Direct	4	Direct	647
			Contracted	25	/	
			/		Community	2883
			Direct	3	Direct	45

³ Based on the currently available information, the first batch of investment activities will not involve any of the suppliers that would, on an ongoing basis, provide directly to the project goods or material essential to solid waste management (SWM) services (the project's core function).

City / county / district	Subproject type	Main activity	Construction stage workers		Operation stage workers	
			Type	Number	Type	Number
	Transfer facilities	Construction of WTSS, truck maintenance center, and trucks	Contracted	47	/	

Note: compiled from data provided by the PMOs, PIUs and feasibility study agency

2. Potential risks and impacts

At the preparation stage, a social impact survey and extensive stakeholder engagement were conducted by means of data collection, focus group discussion (FGD), key information interview (KII), etc. The Project's risks and impacts on different types of workers were identified, considering different types of subproject activities, the nature of the social risks and impact, the types of work involved, and different stages of the relevant subprojects and activities of the first batch of investments.

According to the social audit and SIA of Batch 1 subprojects, the PMO/PIUs at the construction and operation stages are mostly government agencies concerned and subordinate agencies, all of which have a sound labor management and supervision system. So, labor risks in terms of child labor, forced labor, recruitment discrimination, etc. will not materialize in Batch 1 subprojects.

Labor risks under the Batch 1 subprojects mainly relate to employment terms and conditions, occupational health and safety (OHS), etc. Labor risks and impacts for Batch 1 subprojects are described below by different stages of relevant subprojects and facilities:

2.1 Front end collection facilities

Front end collection facilities in Linwei District, Chengcheng County and Chencang District mainly involve the construction of waste collection points, waste sorting pavilions (in Linwei and Chencang Districts) and waste collection sites/points (Chencang District only), and the purchase of waste bins and collection trucks. In Chengcheng County, electric collection trucks will be purchased, and the construction of collection sites and sorting pavilions is not involved. Waste collection points will be constructed in rural areas in Linwei and Chencang District, with an average floor area of 20-30 m²; and waste sorting pavilions will be constructed on existing sites in urban communities in the two districts, with an average floor area of 2 m². In addition, 32 waste collection sites will be constructed in Chencang District, including two urban ones and 30 rural areas, with an average floor area of 500 m² each. The urban waste sorting pavilions will be provided with

waste bins, and involve land leveling and waste bin installation; the rural waste collection points and waste collection sites in Chencang District involve small scale construction and waste bin installation. See Table 3 presents the main risks and impacts of related workers during the construction and operation stages.

Labor risks at the construction stage

Workers involved in the construction of front end collection facilities mainly include contracted workers responsible for small scale construction and the PMO/PIUs' staff in charge of daily management (direct workers) in Linwei and Chencang Districts. Direct workers are exposed to low risks, mostly accident risks during construction site inspection. The direct workers of PMO/PIUs are usually covered by accident insurance, and such risks can be avoided by strengthening safety training and site management. Risks to which contracted workers are exposed mainly include construction accidents and delayed or insufficient salary payment. In Chengcheng County, no contracted worker is involved given Chencang will use the loan proceeds to buy waste transportation vehicles for the front-end collection systems rather than to construct rural collection points.

Labor risks at the operation stage

Workers involved in front end collection facilities / systems at the operation stage include cleaners and transfer workers involved in front end waste transfer and front end facility cleaning, and operation and maintenance (O&M) workers, including:

- In urban areas, sanitation workers (mainly including cleaners and transfer workers (drivers, attendants)) employed directly by the environmental sanitation authorities (i.e., Linwei District Environmental Sanitation Center (ESC), Chengcheng County ESC and Chencang District Waste Management Service Center) are responsible for waste collection and transfer, and the O&M of waste sorting pavilions. They are direct workers of respective Environmental Sanitation Center in Linwei, Chengcheng and Chencang.
- In townships, sanitation workers (mainly including cleaners and drivers) employed by township governments are responsible for waste transfer, and the O&M of waste collection points and sites. They are township direct workers. Few townships (e.g., Fengyuan Town, Linwei District) outsource front end services, and these workers are contracted workers.
- In villages, village cleaners and transfer workers are responsible for waste transfer and the O&M of waste collection points; in urban communities,

community cleaners are responsible for waste transfer and the O&M of waste collection pavilions. All these workers are community workers.

The social audit on front end collection and transfer systems finds that though urban and rural sanitation workers are classified into different types of project workers, labor risks to them are similar, including:

- Gaps exist in working conditions and remuneration for some sanitation workers: For example, some workers have not signed a labor contract, have long working hours, and their salaries and overtime pays are lower than the statutory levels.
- OHS risks: injury, working at high temperature and infection (e.g., COVID-19) for sanitation workers; and traffic accidents for drivers

For community workers who usually have relatively short working hours per day, main risks include no labor contract, no personal accident insurance, infection (e.g., COVID-19), lack of safety training and traffic accidents.

Table 3 Types of workers of collection facilities and key risks

Stage	Area		Worker type	Main jobs	Number	Potential risks and impacts	
Linwei District							
Construction	Urban		Direct	Managers	2	Accidents (limited OHS risks)	
			Contracted	Construction workers	10	Construction accidents, delayed salary payment	
	Rural		Direct	Managers	2	Accidents (limited OHS risks)	
			Contracted	Construction workers	20	Construction accidents, delayed salary payment	
Operation	Urban		Direct	Cleaners	1463	Traffic accidents, working at high temperature, infection, insufficient salaries and overtime pay	
				Transfer workers (drivers, attendants)	371	Traffic accidents	
				Managers	140	Limited OHS risks	
			Community	Community cleaners	1000	infection	
	Rural	Townships		Direct	Cleaners	126	Traffic accidents, infection, insufficient salaries and overtime pay
					Transfer workers	48	Traffic accidents
				Contracted	Cleaners	12	Traffic accidents, infection, insufficient salaries and overtime

Stage	Area		Worker type	Main jobs	Number	Potential risks and impacts	
						pay	
				Transfer workers	3	Traffic accidents, infection	
		Villages	Community	Cleaners	2403	Traffic accidents, infection	
Chengcheng County ⁴							
Operation	Urban		Direct	Cleaners	256	Traffic accidents, working at high temperature, infection, insufficient salaries and overtime pay	
				Transfer workers (drivers, attendants)	158	Traffic accidents, infection	
				Managers	61	Limited OHS risks	
			Community	Community cleaners	800	infection	
	Rural	Townships		Direct	Cleaners	141	Traffic accidents, infection, insufficient salaries and overtime pay
					Transfer workers ⁵	35	Traffic accidents, infection
		Villages		Community	Cleaners	1108	Traffic accidents, infection
					Transfer workers	160	Traffic accidents
Chengcang District							
Construction	Urban		Direct	Managers	2	Accidents (limited OHS risks)	
			Contracted	Construction workers	10	Construction accidents, delayed salary payment	
	Rural		Direct	Managers	2	Accidents (limited OHS risks)	
			Contracted	Construction workers	15	Construction accidents, delayed salary payment	
Operation	Urban		Direct	Cleaners	354	Traffic accidents, working at high temperature, infection, insufficient salaries and overtime pay	
				Transfer workers (drivers, attendants)	45	Traffic accidents	
				Managers	32	Limited OHS risks	
			Community	Community cleaners	1000	Infection	

⁴ In Chengcheng County, front end collection and transfer systems involve truck purchase only, and do not involve construction.

⁵ In Chengcheng County, township and rural domestic waste is collected by door-to-door vehicles.

Stage	Area		Worker type	Main jobs	Number	Potential risks and impacts
	Rural	Townships	Direct	Cleaners	173	Infection
				Transfer workers	43	Traffic accidents
		Villages	Community	Cleaners	1627	Traffic accidents, infection
				Transfer workers	256	Traffic accidents

Source: data provided by the feasibility study agency

2.2 Transfer facilities

In Linwei District, Chengcheng County and Chencang District, transfer facilities are newly constructed or reconstructed WTSs. Table 3 presents the job positions, types of workers employed/engaged, and underlying labor risks for constructing and operating the WTSs.

Labor risks at the construction stage

Workers involved in transfer facilities at the construction stage mainly include staff of the Linwei District ESC, Chengcheng County ESC, and Chencang District Urban Administration and Law Enforcement Bureau (direct workers) in charge of daily management of relevant facilities, and contracted workers involved in the construction of WTSs and equipment installation (contracted workers). For PMO/PIUs' direct workers, main risks are accidents, which are low risk, and can be avoided by strengthening safety training and site management.

WTSs do not involve large scale construction and equipment installation. For contracted workers, main risks are construction and operation accidents, delayed salary payment, etc.

Labor risks at the operation stage

Workers involved in WTSs at the operation stage are direct workers of the PIUs. According to the social audit and SIA, risks for workers of the newly constructed transfer facilities at the operation stage are similar to the risks those of workers of existing WTSs, including:

- WTS operators: noise and odor, infection, long working hours, insufficient salaries and overtime pay, and infection to infectious of diseases;
- WTS drivers and attendants: road safety risks and traffic accidents, etc.
- WTS cleaners: long working hours, insufficient salaries and overtime pay, and infection of diseases;
- Staff in management positions and security guards: limited OHS risks

In Chencang District, a truck parking and maintenance center will be constructed. For its contracted workers at the construction stage, main risks are construction accidents and delayed salary payment. For direct workers in management positions and repair workers at the operation stage, main risks include traffic accidents, but are low, and can be avoided by regulating operating processes and strengthening safety training.

Table 4 Types of workers of transfer facilities and key risks

Facility	Stage	Worker type	Main jobs	Number	Potential risks and impacts
Linwei District					
WTS	Construction	Direct	Managers	3	Accidents (limited OHS risks)
		Contracted	Project managers	1	Accidents (limited OHS risks)
			Construction workers	25	Construction safety risks, delayed salary payment
			Installation workers	15	Mechanical injury, working at height, delayed salary payment
	Operation	Direct	Station masters	8	Odor, infection
			Operators	16	Odor, infection
			Cleaners	16	Odor and noise, insufficient salaries and overtime pay, infection
			Security guards	18	Insufficient salaries and overtime pay, infection
Chengcheng County					
WTS	Construction	Direct	Managers	2	Accidents (limited OHS risks)
		Contracted	Project managers	1	Accidents (limited OHS risks)
			Construction workers	20	Construction safety risks, delayed salary payment
			Installation workers	10	Mechanical injury, working at height, delayed salary payment
	Operation	Direct	Station masters	9	Odor, infection
			Operators	19	Odor, infection
			Cleaners	18	Odor and noise, insufficient salaries and overtime pay, infection
			Security guards	18	Insufficient salaries and overtime pay, infection
Chencang District					
WTS	Construction	Direct	Managers	2	Accidents (limited OHS risks)
		Contracted	Project managers	1	Accidents (limited OHS risks)
			Construction workers	20	Construction safety risks, delayed salary payment
			Installation workers	10	Mechanical injury, working at height, delayed salary payment
	Operation	Direct	Station	5	Odor, infection

Facility	Stage	Worker type	Main jobs	Number	Potential risks and impacts
			masters		
			Operators	10	Odor, infection
			Cleaners	10	Odor and noise, insufficient salaries and overtime pay, infection
			Security guards	10	Insufficient salaries and overtime pay, infection
truck maintenance center	Construction	Direct	Managers	1	Accidents (limited OHS risks)
		Contracted	Project managers	1	Accidents (limited OHS risks)
			Construction workers	10	Construction safety risks, delayed salary payment
			Installation workers	5	Mechanical injury, working at height, delayed salary payment
	Operation	Direct	Managers	1	Limited OHS risks
			Repair workers	2	Mechanical injury, infection
			Security guards	7	Insufficient salaries and overtime pay, infection

Source: data provided by the feasibility study agency

2.3 Sorting center

In the Batch 1 subprojects, an operating sorting center in Linwei District will be reconstructed. The sorting center is under operation, for which a social audit was conducted. Table 3 presents the job positions, types of workers employed/engaged, and the underlying risks and impacts to relevant workers during the reconstruction and operation stages.

Reconstruction stage

During the reconstruction of the sorting center, workers mainly include managers of the Linwei District ESC (direct workers), and contracted workers involved in construction and installation (contracted workers). For the staff in management positions, main risks are accidents, but are low, and can be avoided by strengthening safety training and site management.

The reconstruction of the sorting center involves civil works and equipment installation. For contracted workers, main risks are construction and operation accidents, delayed salary payment, etc.

Operation stage

Workers at the operation stage of the sorting center mainly include O&M workers, all being direct workers of Linwei District Used Material Recycling Company. The company has 22 workers, in which 11 are responsible for administrative work (including general manager's office staff, waste plastic officer,

scrap paper officer and scrap metal officer), and the other 11 are operators (including sorters, drivers, equipment operators, etc.). Their risks include:

- Staff in management positions: Their salaries and benefits generally comply with the Labor Law and ESS2, and OHS risks to these workers are low, but the PIU (Linwei District Used Material Recycling Company) should sign a formal labor contract with them.
- Operators and sorters: They have not signed a formal labor contract; they have no social insurance and no fixed day off; they are exposed to workplace OHS risks such as noise and dust, scratch, operation accidents, fires, infection of diseases (including COVID-19), etc.
- Drivers: They have no social insurance and no fixed day off, and may suffer from traffic accidents.

Table 5 Types of workers of sorting facilities and key risks

Facility	Stage	Worker type	Main jobs	Number	Potential risks and impacts
Linwei District sorting center	Construction	Direct	Managers	2	Accidents (limited OHS risks)
		Contracted	Project managers	1	Accidents (limited OHS risks)
			Construction workers	10	Construction safety risks, delayed salary payment
			Installation workers	5	Construction safety risks, delayed salary payment
	Operation	Direct	Managers	4	Limited OHS risks
			Sorters	13	No social insurance and day off, dust / noise, scratch
			Operators	4	No social insurance and day off, operation risks
			Drivers	3	No social insurance and day off, traffic accidents

Source: data provided by the feasibility study agency

2.4 Landfill closure

The Batch 1 subprojects also involve the closure of 4 landfills in Linwei District, Chengcheng County and Baoji City. Table 5 presents the job positions and types of workers involved in landfill closure and post-closure maintenance and the underlying risks and impacts to relevant workers.

Closure stage

Workers involved in landfill closure mainly include staff in management positions of the Linwei District ESC, Chengcheng County ESC and Baoji City SWMC (direct workers), and contracted workers involved in landfill closure (contracted workers). For PIU's direct workers, main risks are accidents, but are low risks, and can be avoided by strengthening safety training and site management.

For contracted workers, main risks are OHS risks, including landfill gas explosion, landfill gas poisoning, slope instability, odor, hot work, etc., as well as working conditions risks, including the lack of accident insurance, delayed salary payment, non-payment of overtime pay, etc.

Post-closure maintenance stage

Workers at the post-closure maintenance stage mainly include workers dealing with landfill maintenance, leachate treatment, landfill gas treatment and biogas power generation. Landfill maintenance is the responsibility of direct workers, and leachate treatment and biogas power generation are handled by contracted workers of third parties. Their main risks are:

- **Direct workers:**
 - The working conditions of cleaners, file clerks have gaps from the regulatory requirements, such as absence of labor contract, long working hours, no day off, and insufficient labor remuneration and overtime pay;
 - OHS risks for disinfectors, safety officers: exposure to chemicals, gas poisoning and explosion, working at high temperature, infection (including COVID-19), etc.; for landfill with slope instability (e.g., the Chengcheng and Changshougou Landfills), also including safety and injury risks
- **Contracted workers:** Workers' working conditions and OHS management generally meet the regulatory requirements. They are exposed to OHS risks mainly, including exposure to chemicals, gas explosion, and infection (including COVID-19).

Table 6 Types of workers of disposal facilities and key risks

Landfill	Stage	Type of workers	Jobs	#	Potential risks and impacts
Linwei District Majiagou Landfill closure	Construction	Direct	Managers	3	Construction accidents, infection (limited OHS risks)
		Contracted	Project managers	1	Construction accidents, harmful gas, infection
			Construction workers	35	Delayed salary payment, construction safety risks, harmful gas, infection
			Safety officers	3	Delayed salary payment, construction safety risks, harmful gas, infection

Landfill	Stage	Type of workers	Jobs	#	Potential risks and impacts		
			Drivers	4	Traffic accidents, harmful gas, infection		
			Operators	4	Operation risks, harmful gas, infection		
	Operation	Direct	Managers	1	Harmful gas impact, infection		
			Disinfectors	2	Insufficient salaries, exposure to disinfectant (chemical), harmful gas		
			Drivers	3	Harmful gas impact, noise, infection		
			Safety officers	2	Harmful gas impact, accidents, infection		
			Measurers	1	Infection		
			File clerks	1	Insufficient salaries, infection		
			Cleaners	3	Insufficient salaries, harmful gas		
			Security guards	7	Insufficient salaries, harmful gas, infection		
			Contracted	Leachate treatment	Managers	1	Harmful gas impact, infection (limited OHS risks)
					Operators	7	Operation risks, harmful gas, infection
	Biogas power plant	Managers		2	Harmful gas impact, infection (limited OHS risks)		
		Operation workers		3	Harmful gas impact, gas explosion, infection		
		Collectors		1	Harmful gas impact, gas explosion, infection		
Chengcheng Landfill closure	Construction	Direct	Managers	3	Accidents (limited OHS risks)		
		Contracted	Project managers	1	Construction accidents, harmful gas, infection		
			Construction workers	35	Delayed salary payment, construction safety risks, landslide, harmful gas, infection		
			Safety officers	3	Delayed salary payment, construction safety risks, landslide, harmful gas, infection		
			Drivers	4	Traffic accidents, harmful gas, infection		
			Operators	4	Operation risks, harmful gas, infection		
	Operation	Direct	Managers	1	Harmful gas impact, infection		

Landfill	Stage	Type of workers	Jobs	#	Potential risks and impacts
			Disinfectors	1	Insufficient salaries and overtime pay, exposure to disinfectant (chemical), harmful gas
			Security guards	2	Insufficient salaries and overtime pay, harmful gas
			Leachate treatment workers	5	Harmful gas impact, infection
Chengcheng County Yaotou Landfill closure	Construction	Direct	Managers	3	Accidents (limited OHS risks)
		Contracted	Project managers	1	Construction accidents, harmful gas, infection
			Construction workers	26	Delayed salary payment, construction safety risks, harmful gas, infection
			Safety officers	2	Delayed salary payment, construction safety risks, harmful gas, infection
			Drivers	4	Traffic accidents, harmful gas, infection
			Operators	4	Operation risks, harmful gas, infection
	Operation	Direct	Managers	1	Harmful gas impact, infection
			Disinfectors	1	Insufficient salaries and overtime pay, exposure to disinfectant (chemical), harmful gas
			Drivers	2	Operation risks, harmful gas
			File clerks	2	Insufficient salaries
			Security guards	2	Insufficient salaries and overtime pay, harmful gas
Baoji City Changshougou Landfill closure	Construction	Direct	Managers	3	Accidents (limited OHS risks)
		Contracted	Project managers	1	Construction accidents, harmful gas, infection
			Construction workers	60	Delayed salary payment, construction safety risks, landslide, harmful gas, infection
			Safety officers	5	Delayed salary payment, construction safety risks, landslide, harmful gas, infection

Landfill	Stage	Type of workers	Jobs	#	Potential risks and impacts	
			Drivers	6	Traffic accidents, harmful gas, infection	
			Operators	10	Operation risks, harmful gas, infection	
	Operation	Direct	Managers	3	Harmful gas impact, infection	
			Disinfectors	1	Exposure to disinfectant (chemical), harmful gas, infection	
			Disinfection vehicle drivers	1	Exposure to disinfectant (chemical), harmful gas, infection	
			Operators	6	Harmful gas impact, noise, infection	
			Truck drivers	7	Traffic accidents, noise, infection	
			Leachate treatment workers	13	Harmful gas impact, infection	
			Safety officers	2	Harmful gas impact, accidents, infection	
			File clerks	1	Infection (limited OHS risks)	
			Security guards	3	Harmful gas impact, infection	
			Contracted (biogas power plant)	Managers	2	Harmful gas impact, infection
				Operation workers	6	Harmful gas impact, gas explosion, infection
		Collectors		2	Harmful gas impact, gas explosion, infection	

3. Overview of labor legislation

3.1 Employment terms and conditions

China has established a sound system of laws and regulations on labor management. As a member of the International Labor Organization (ILO), China has approved 28 conventions (including 20 that have taken effect, as shown in Table 7), including equal remuneration, discrimination, minimum age, child labor, OHS, employment policy, consulting, right of association, etc. In general, the Chinese and Shaanxi policies make provisions on salary payment, working hours, labor protection and labor disputes address, prohibit forced labor and child labor, and protect female and underage workers specially, which is completely consistent with the requirements of ESS2. Table 6 lists applicable domestic labor laws and regulations. Specifically:

- **Labor contract management:** The Labor Law and Labor Contract Law stipulate that an employer shall sign a labor contract in writing with an employee. The labor contract shall cover the basic terms and conditions, including the term, scope and place of work, working hours, rest time, labor remuneration, overtime pay, labor protection, working conditions, protection against occupational hazards, etc.
- **Working hours:** According to the Labor Law, the average working hours of workers shall not exceed 40 hours per week or 8 hours per day; the employer shall ensure that workers has at least one day off per week, and grant leaves to workers on legal holidays, which can be flexible according to the actual situation.
- **Overtime:** An employer shall comply strictly with the labor quota, and shall not force workers to work overtime. In case of overtime work, an employer shall pay an overtime pay to workers. Working hours could be extended due to the needs of production and operation after consultation with the trade union and labors, generally not exceeding one hour per day; Where it is necessary to extend working hours due to special reasons, the extended working hours shall not exceed three hours per day, and 36 hours per month, under the condition that the health of workers is guaranteed.
- **Labor remuneration and benefits:** The state practices a minimum salary policy. The Labor Law stipulates, workers should be paid above the local minimum salary standard, and salaries shall be paid to workers in cash monthly, and shall not be deducted or delayed without justification. Employers shall pay workers during legal holidays and statutory leaves. Both employers and workers shall cover social insurance according to law.

For Community workers on public welfare jobs, the state and provincial regulations stipulate, employers shall sign a labor contract with public welfare workers annually, and pay salaries not lower than the local minimum salary standard monthly. Such workers shall be entitled to legal holidays, paid leaves, personal accident insurance, etc.

ESS2 requires that an employer develop and implement a written LMP for all types of workers, including employment terms and conditions, and statutory entitlements (working hours, salary, overtime, benefits, etc.), pay workers regularly, and provide sufficient rest and leaves. For community workers, their terms and conditions should be specified, including amount and way of payment (if applicable), working hours, and grievance redress channels.

For direct, contracted and community workers, some existing facilities have gaps from the Labor Law, Labor Contract Law and ESS2 in terms of labor contract management, working hours, labor remuneration, etc. **For community workers** involved in rural front end collection and transfer systems also have some gaps from the Labor Law, Labor Contract Law and ESS2 in terms of labor contract management, labor safety risk management, insurance, etc. This LMP will propose measures and actions for such gaps to ensure consistency with the applicable state regulations and ESS2.

Table 7 Applicable laws and regulations on labor and working conditions

No.	Title	Effective year
1	China's Labor Law	1995, amended in 2018
2	Provisions of the State Council on Working Hours of Workers and Staff	1995
3	Regulations on the Implementation of China's Labor Contract Law	2008
4	China's Labor Contract Law	2008, amended in 2012
5	Special Rules on Labor Protection of Female Employees	2012
6	Measures of Shaanxi Province for the Implementation of the Regulations on Work-related Injury Insurance	2004, amended in 2011
7	Regulations on Minimum Salaries of Shaanxi Province	2006
8	Special Rules on Labor Protection of Female Employees of Shaanxi Province	2018
9	Administrative Measures for the Development of Public Welfare Jobs of Shaanxi Province	2019
10	Notice of the Shaanxi Provincial Labor and Social Security Department, and Finance Department on the Management of the Development of Public Welfare Jobs	2020

Source: desk study

Table 8 List of ILO Conventions Ratified by China⁶

Convention	Date
Basic conventions (4)	
C100 - Equal Remuneration Convention, 1951 (No.100)	1990.12.02
C111 - Discrimination (Employment and Occupation) Convention, 1958 (No.111)	2006.01.12
C138 - Minimum Age Convention, 1973 (No.138), specifying the minimum wage of 16 years	1999.04.28
C155 - Occupational Safety and Health Convention, 1981 (No.155)	2007.01.25
C182 - Worst Forms of Child Labor Convention, 1999 (No.182)	2002.08.08
Governance (priority) conventions (2)	
C122 - Employment Policy Convention, 1964 (No.122)	1997.12.17
C144 - Tripartite Consultation (International Labor Standards) Convention, 1976 (No.144)	1990.11.02
Technical conventions (1)	
C011 - Right of Association (Agriculture) Convention, 1921 (No.11)	1934.04.27

⁶ On August 12, 2022, the Chinese government approved the Forced Labor Convention, 1930 (No.29) and Abolition of Forced Labor Convention, 1957 (No. 105), which will take effect one year after approval.

Convention	Date
C014 - Weekly Rest (Industry) Convention, 1921 (No. 14)	1934.05.17
C019 - Equality of Treatment (Accident Compensation) Convention, 1925 (No. 19)	1934.04.27
C026 - Minimum Wage-Fixing Machinery Convention, 1928 (No. 26)	1930.05.05
C027 - Marking of Weight (Packages Transported by Vessels) Convention, 1929 (No. 27)	1931.06.24
C032 - Protection against Accidents (Dockers) Convention (Revised), 1932 (No. 32)	1935.11.30
C045 - Underground Work (Women) Convention, 1935 (No. 45)	1936.12.02
C080 - Final Articles Revision Convention, 1946 (No. 80)	1947.08.04
C150 - Labor Administration Convention, 1978 (No. 150)	2002.03.07
C159 - Vocational Rehabilitation and Employment (Disabled Persons) Convention, 1983 (No. 159)	1988.02.02
C167 - Safety and Health in Construction Convention, 1988 (No. 167)	2002.03.07
C170 - Chemicals Convention, 1990 (No. 170)	1995.01.11
Maritime Labor Convention, 2006 (MLC) According to A4.5 (2) and (10), the government designates the following social security sectors: medical, unemployment benefit, pension, employment injury benefit, and maternity benefit.	2015.12.12, amended in 2016 and 2018

Source: official website of ILO, August 2020

3.2 OHS

In China, there are over one hundred technical codes and standards on OHS, and disease prevention and control. These technical codes and standards are developed based on or updated toward industry best practices, e.g., relevant technical codes/norms of the WHO, EU or USA, and the requirements of the International Labor Conventions. These technical codes and standards must be applicable to the design and operation of the facilities. The laws and regulations of China and Shaanxi Province provide the protection of occupational health and safety for workers. See Table 9.

Table 9 Applicable laws and regulations on OHS

No.	Title	Effective year
1	Work Safety Law of the PRC	Amended in 2021
2	Law on the Prevention and Control of Occupational Diseases	Amended in 2018
3	Regulations on Labor Protection at Workplaces Using Toxic Substances	2002
4	Emergency Response Law of the PRC	2007
5	Measures for the Supervision and Administration of Employers' Occupational Health Surveillance	2012
6	Supervision and Administration Measures for the "Three Simultaneities" of Safety Facilities for Construction Projects	Amended in 2015
7	Supervision and Administration Measures for the "Three Simultaneities" of Occupational Protection Facilities for Construction Projects	2017
8	Provisions on the Administration of Occupational Health at Workplaces	2021
9	Regulations on the Work Safety Responsibility of Production and Business Units of Shaanxi Province	2012
10	Overall Contingency Plan for Emergencies of Shaanxi Province	2021
11	Contingency Plan for Special Equipment Accidents of Shaanxi	2022

No.	Title	Effective year
	Province	
12	Plan of Shaanxi Province for Occupational Disease Prevention and Control (2021—2025)	2022

Source: desk study

According to the above laws and regulations, the main OHS requirements are as follows:

1) Employers shall establish a complete occupational health and safety system, strictly enforce relevant measures and standards, and offer relevant training to workers to prevent accidents at work, and reduce occupational hazards.

2) Labor safety and health facilities must comply with the applicable national standards. Labor safety and health facilities must be designed, constructed and put into operation together with the main part of the newly constructed, reconstructed or expanded project⁷.

3) Employers shall provide labor safety and health conditions, and necessary labor PPE complying with the state provisions to workers, and conduct regular health checkups for workers doing hazardous jobs.

4) Workers doing special jobs must receive special training and be qualified for such jobs.

5) Offer necessary safety training and PPE to workers.

6) Perform pre-job, on-the-job and post-job occupational health checkups for workers.

7) Cover work-related injury insurance for workers.

8) Workers must comply strictly with safety operation regulations at work, and shall have the right to reject employer management staff's nonconforming or risky instructions, and criticize or report activities endangering safety and physical health.

9) The state shall establish a counting, reporting and handling system for casualty accidents and occupational diseases. Labor authorities of governments at or above the county level and employers shall count, report and handle casualty accidents and occupational diseases of workers at work.

⁷ According to the Supervision and Administration Measures for the "Three Simultaneities" of Occupational Protection Facilities for Construction Projects (2017), occupational protection facilities for construction projects must be designed, constructed, and put into operation together with the main part.

The main OHS requirements in ESS2 include: Design and implement OHS measures; develop an implementation procedure; establish and maintain a safe working environment to ensure the safety of workplace, machinery, equipment and processes; offer OHS training and PPE to workers; establish a workplace process for workers to report situations deemed unsafe or unhealthy; consider the Bank's general EHSs and EHSs for certain sectors, and other GIIPs. For community workers, ESS2 requires that potential risks and impacts be assessed, and at least the Bank's general EHSs and EHSs for certain sectors are applied.

Based on the social audit, the existing facilities in the Batch 1 subprojects have some gaps in OHS risk management from the Labor Law, Law on the Prevention and Control of Occupational Diseases, and ESS2. This LMP will propose measures and actions for such gaps to ensure consistency with the applicable state regulations and ESS2.

As mentioned above, the gaps between national law/regulation and ESS2 regarding to labors (including employment terms and conditions, OHS), which are briefly analyzed in Table 10, and briefly summarized as below.

- No LMP is required to be prepared on the project level as per China's labor law.
- The labor management policies and procedures of relevant projects usually do not contain requirements for the project owners to monitor and follow up on the labor management performances for contractors, community workers or primary suppliers.

The project will improve and adopt the LMP, consistent with the domestic regulations and ESS2.

Table 10 Gap Analysis on China’s Legal Framework and ESS2

No.	China’s Laws / regulations	Requirements	ESS requirements	Gap analysis and gap-filling
1	Labor Law of the PRC (amended in 2018); Labor Contract Law of the PRC (amended in 2012)	Employers shall sign a labor contract in writing with an employee. The labor contract shall cover the basic terms and conditions, including the term, scope and place of work, working hours, rest time, labor remuneration, overtime pay, labor protection, working conditions, protection against occupational hazards, etc. Employers shall not force workers to work overtime. In case of overtime work, an employer shall pay an overtime pay to workers. Forced labor shall be prohibited. Anyone who uses laborer by force, threat or illegal restriction of personal freedom shall be prosecuted criminally.	The scope of application of ESS2 depends on the type of employment between the borrower and project workers, including direct workers, contracted workers, primary supply workers, and community workers. The borrower should develop and implement a written LMP applicable to the component. ESS2 requires that the borrower should provide a document that specifies the employment terms and conditions to project workers, and pay them according to the state laws and LMP. As required by the state laws or LMP, project workers should receive a termination slip and a severance pay list timely. ESS2 prohibits forced labor.	Largely consistent Main gaps: <ul style="list-style-type: none"> • No LMP is required to be prepared on the project level as per China’s law. • The labor management policies and procedures of enterprises/projects usually do not include explicit requirements for the project owners to monitor and follow up on the labor management performances for contracted workers, community workers and primary supply workers. Gap-filling: The PMOs and PIUs should improve and adopt LMPs for direct workers, contracted workers and community workers;
2	Regulations on Labor Security Supervision (amended in 2018)	China has a sound labor dispute mediation system through a corporate committee under the formal trade union system. Workers may also appeal through the labor bureau directly. The labor security supervision over enterprises and individual industrial and commercial entities shall be governed by these Regulations. The labor security supervision over job intermediary institutions, occupational skills training institutions, and occupational skills assessment and authentication institutions shall be conducted in accordance with these Regulations.	ESS2 requires that a GRM must be established for all direct and contracted workers to file grievances about the workplace.	The PIUs should establish a mechanism to improve contractors’ labor management, such as including related requirements for the contractors proportionate to the labor risk rating in the TORs, in the bidding documents and contracts to strengthen contracted workers risk management, and protect contracted workers’ health, safety and well-being. The contractors should make clear actions to be taken (as part of their LMP or research plan) before project implementation. In addition, the PMOs will ask relevant staff to attend E&S training to enhance management capacity, and

No.	China's Laws / regulations	Requirements	ESS requirements	Gap analysis and gap-filling
		<p>The labor security supervision over an employing entity shall be under the jurisdiction of the labor security administration at the county level or at the level of a city divided into districts at the locality of employment by the employing entity.</p> <p>Labor security supervision shall be conducted in such forms as routine inspection, written review, special inspection, and complaint investigation.</p>		<p>conduct semiannual monitoring to track their labor management performance.</p>
3	Trade Union Law of the PRC (amended in 2009)	<p>All physical and mental workers of enterprises and public institutions shall have the right to join and organize trade unions, regardless of ethnic group, race, gender, occupation, religion and education. An enterprise or public institution shall establish a trade union according to law within one year after opening.</p> <p>The trade union shall urge enterprises and public institutions to cover endowment, unemployment, medical, injury, maternity and other social insurance for workers according to law.</p> <p>The trade union shall assist enterprises and public institutions in collective welfare, salary payment, social insurance, labor safety and health, etc.</p>	<p>ESS2 specifies that if the laws of the borrower allow workers to organize and bargain freely, such laws will apply. In this case, a worker organization will be established according to law, and information required for effective negotiation provided timely.</p>	
4	Law of the PRC on the Protection of Rights and Interests of Women (amended in 2018); Special Provisions on Labor Protection of Female Employees (2017)	<p>Special protection shall be offered to women and children, and they shall not be hired for dangerous jobs.</p> <p>Women shall enjoy the same labor and social security rights as men, and receive equal pay for equal work.</p> <p>The employer shall protect women's safety and health at work, and not assign unsuitable jobs to women. Women enjoy special</p>	<p>ESS2 proposes appropriate protection and assistance measures to address the vulnerability of certain worker groups, including women, the disabled, migrant workers and child labor.</p>	

No.	China's Laws / regulations	Requirements	ESS requirements	Gap analysis and gap-filling
		<p>protection during menstruation, pregnancy, lying-in and breastfeeding periods.</p> <p>The employer shall prevent sexual harassment on female workers, and protect their privacy when handling their appeals.</p>		
5	<p>Law on the Prevention and Control of Occupational Diseases; (Amended in 2018)</p> <p>Work Safety Law of the PRC (Amended in 2021)</p>	<p>Employers shall establish a complete occupational health and safety system, strictly enforce relevant measures and standards, and offer relevant training to workers to prevent accidents at work, and reduce occupational hazards.</p> <p>Employers shall provide labor safety and health conditions, necessary safety trainings, PPE, related injury insurance and pre-job, on-the-job and post-job occupational health checkups for workers.</p> <p>Workers must comply strictly with safety operation regulations at work, and shall have the right to reject employer management staff's nonconforming or risky instructions, and criticize or report activities endangering safety and physical health.</p> <p>Establish a counting, reporting and handling system for casualty accidents and occupational diseases. Labor authorities of governments at or above the county level and employers shall count, report and handle casualty accidents and occupational diseases of workers at work.</p>	<p>Establish and maintain a safe working environment to ensure the safety of workplace, machinery, equipment and processes;</p> <p>Offer OHS training and PPE to workers;</p> <p>Establish a workplace process for workers to report situations deemed unsafe or unhealthy;</p> <p>Consider the Bank's general EHSGs and EHSGs for certain sectors, and other GIIPs.</p> <p>For community workers, ESS2 requires that potential risks and impacts be assessed, and at least the Bank's general EHSGs and EHSGs for certain sectors are applied.</p>	<p>The two laws and the corresponding set of domestic technical standards are consistent with the relevant aspects of ESS2 on OHS.</p>
6	<p>Three Simultaneities" of Occupational Protection Facilities for Construction Projects (2017)</p>	<p>occupational protection facilities for construction projects must be designed, constructed, and put into operation together with the main part.</p>	<p>Design and implement adequate OHS measures;</p>	<p>This policy and the corresponding set of domestic technical standards are consistent with relevant aspects of ESS2 on OHS.</p>

4. Agencies responsible, responsibilities and resources

For the Batch 1 subprojects, responsibilities and resources (staffing and financial) in labor management are as follows:

4.1 Shaanxi PMO

The Shaanxi PMO will be responsible for project organization, coordination, supervision and guidance, including managing the performance of different types of workers in coordination with the PMO and PIUs, and report to the World Bank. The Shaanxi PMO's main responsibilities in labor management include:

- The Shaanxi PMO has promised to appoint an environmental and a social focal point to coordinate the Project's overall E&S risk management, including the management of risks and impacts on workers;
- Appoint one qualified environmental specialist and one qualified external social specialist, as part of the extended in-house capacity, to assist the Shaanxi PMO in managing E&S risks, and give directions to the PIUs on LMP implementation;
- Prepare a labor risk management training program for workers with the assistance of the external social specialist, prepare a budget to implement the measures and actions in the LMP in coordination with the PMOs and PIUs;
- Organize topical training on how to implement the measures and actions in the LMP for the PMOs, PIUs, contractors, different types of workers during the project implementation;
- Give guidance on including labor management requirements in relevant contracts during bidding and procurement to the city / county / district PMOs and PIUs for contracted worker management at the construction and operation stages;
- Appoint an external social consultant to conduct external social monitoring, covering the implementation of the measures and actions in the LMP and ESCP.

4.2 City /county / district PMOs

The Linwei District PMO is at the Linwei District ESC, the Chengcheng County PMO at the Chengcheng County Agriculture and Rural Affairs Bureau, and the Baoji

City and Chencang District PMOs at the city / district urban administration and law enforcement bureaus respectively. Their main responsibilities include:

- Appoint at least an environmental and a social focal point to coordinate and supervise social risk management (including labor management), and coordinate staff and budgets;
- Urge the PIUs to implement the measures and actions in the LMP and ESCP;
- Implement the labor management requirements for contracted workers in the bidding documents, and include them in the contract;
- Ask the PIUs to conduct internal monitoring on the implementation of social risk management (including the LMP), and report to the county / district PMOs regularly;
- Assist the external social monitor in conducting external monitoring on the implementation of social risk management implementation (including labor management performance), and reporting to the Shaanxi PMO⁸.

4.3 PIUs

The PIUs include those at the construction and operation stages. As the agencies responsible for labor management, these PIUs will appoint at least an environmental and a social focal point to perform labor management as per the LMP, and include adequate costs for labor risks management in their budgets. The PIUs of the first batch of construction subprojects and their main responsibilities are described below.

1) PIUs at the construction stage

The PIUs at the construction stage are mostly the county / district agencies concerned or their subordinate agencies, such as:

- The PIU of the **Linwei District** subproject at the construction stage is the Linwei District ESC under the Linwei District Government;
- The PIU of the **Chengcheng County** subproject at the construction stage is the Chengcheng County ESC under the Chengcheng County Urban Administration and Law Enforcement Bureau;
- The PIU of the **Chencang District** subproject at the construction stage is

⁸ Chencang District is affiliated to Baoji City. Unlike the Linwei District and Chengcheng County PMOs, which report directly to the Shaanxi PMO, the Chencang District PMO will report to the Shaanxi PMO through the Baoji municipal PMO, per the current organizational set-up.

the Chengcheng District Urban Administration and Law Enforcement Bureau;

- The PIU of the **Baoji** subproject at the construction stage is the Baoji City SWMC under the Baoji City Urban Administration and Law Enforcement Bureau.

During construction and landfill closure, the PIUs' main responsibilities are:

- Appoint dedicated staff to supervise LMP implementation at the construction stage;
- Implement the labor management requirements for contracted workers in the bidding documents under the direction of the Shaanxi and county / district PMOs, and include them in the contract;
- Assist in internal and external social monitoring on LMP implementation, and report to the county / district PMOs;
- Depending on the organizational setup, the Chengcheng County PIU should also report labor management performance to the Chengcheng County PMO and its competent authority (Chengcheng County Urban Administration and Law Enforcement Bureau);
- Depending on the organizational setup, the Chencang District PIU should also report labor management performance to the Baoji City PMO through the district PMO.

2) PIUs at the operation stage

In the Batch 1 subprojects, the county / district environmental sanitation authorities will be responsible for the O&M of WTSs and closed landfills at the operation stage. In addition, township governments will be responsible for the O&M of rural front end collection facilities, and an agency under the Linwei District Federations of Supply and Marketing Cooperatives for the O&M of the sorting center. The responsibilities of the PIUs at the operation stage are described below by facility type.

Waste transfer and disposal facilities:

The PIUs responsible for the O&M of transfer and disposal facilities in the Batch 1 subprojects are:

- **For the transfer facilities (including WTSs and truck maintenance center in Chencang District) in Linwei District, Chengcheng County and Chencang District**, the PIUs at the operation stage are the Linwei

District ESC, Chengcheng County ESC and Chencang District Waste Management Service Center, in which the Linwei District ESC is a subordinate agency of the Linwei District Government, and the Chengcheng County ESC and Chencang District Waste Management Service Center are subordinate agencies of the Chengcheng County and Chencang District Urban Administration and Law Enforcement Bureaus respectively;

- **For the Linwei District sorting center**, the PIU at the operation stage is the Linwei District Used Material Recycling Company under the Linwei District Federation of Supply and Marketing Cooperatives;
- **For the landfills in Linwei District, Chengcheng County and Baoji**, the Linwei District ESC, Chengcheng County ESC and Baoji City SWMC will be responsible for O&M.

The main responsibilities of the PIUs at the operation stage are:

- Improve/establish relevant management positions and appoint dedicated staff to implement the LMP at the operation stage, including labor contract, labor remuneration and working hours management, OHS, training, GRM improvement, etc.;
- If any third party service is involved (e.g., landfill leachate treatment and biogas power generation), include the labor management requirements for contracted workers in the bidding documents, and set out relevant remedy provisions for non-compliance in the contract;
- Consistent with the construction stage arrangements, report LMP implementation performance at the operation stage to the city / county / district PMOs.

Front end collection and transfer systems

Township governments and village committees are responsible for the O&M of **rural front end systems**. Their responsibilities are:

- Township governments will improve/establish relevant management positions and appoint dedicated staff to supervise LMP implementation for direct workers at the operation stage;
- If any third party service is involved, township governments include the labor management requirements for contracted workers in the bidding documents under the direction of the county / district PMOs, and set out relevant remedy provisions for non-compliance in the contract;

- Township governments will report LMP implementation at the operation stage to the county / district PMOs regularly;
- Village committees are responsible for LMP implementation for community workers, and township governments and county / district environmental sanitation authorities are responsible for supervision;
- The environmental sanitation authorities of Linwei District, Chengcheng County and Chencang District provide guidance and supervision to regulate the management of township direct and contracted workers, and village community workers.

District / county environmental sanitation authorities are responsible for the O&M of **urban front end systems**. Their responsibilities are:

- Improve/establish relevant management positions and appoint dedicated staff to implement the LMP at the operation stage;
- Report LMP implementation performance at the operation stage to the county / district PMOs regularly;
- Provide guidance and supervision to regulate the management of community workers.

The PIUs will establish/designate dedicated departments for labor management at the construction and operation stages, including employment terms and conditions (labor contract, labor remuneration, overtime pay, working hours, etc.), OHS, contracted worker management, grievance redress, etc. See Table 11.

At the preparation stage, part of the detailed information is unavailable. The PMO/PIUs agreed to fill in the necessary information once the responsible agencies are confirmed, **no later than starting to implement relevant activities**. As part of the scope of work for social monitoring, the social monitor (to be hired by Shaanxi PMO) will follow up on it closely and report the progress in the semi-annual external social monitoring report.

Table 11 Agencies responsible for labor management under the Batch 1 subprojects

PIUs	Agency and contact information			
	Employment terms and conditions	OHS	Grievance redress	Contracted worker management
Linwei District				
Linwei District ESC				
Linwei District Used Material Recycling Company				
Townships				

PIUs	Agency and contact information			
	Employment terms and conditions	OHS	Grievance redress	Contracted worker management
Villages (community workers)	Village committees			
Chengcheng County				
Chengcheng County ESC				
Townships				
Villages (community workers)	Village committees			
Chencang District				
Chencang District Urban Administration and Law Enforcement Bureau				
Chencang District Waste Management Service Center				
Townships				
Villages (community workers)	Village committees			
Baoji City				
Baoji City SWMC				

5. Labor policies and procedures for PIUs

The PIUs of the Batch 1 subprojects are government agencies concerned and subordinate agencies, and would conduct labor management properly as per the applicable state laws and regulations. However, based on the social audit and SIA, their policies and procedures in employment terms and conditions, working conditions, OHS, GRM, etc. still need improvement. The PIUs should improve their relevant policies and procedures at least within one month before the start of construction.

5.1 Linwei District

1) Linwei District ESC

The established personnel and work safety management policies of the Linwei District ESC include:

- Measures for Sanitation Workers Recruitment and Employment of Linwei District (Trial)
- Evaluation Measures for Refined Sanitation Management of Linwei District

(Trial)

- Quality Standard and SOP for Environmental Sanitation of Linwei District
- Work Safety System;
- Landfill Machinery Management System;
- Landfill Disinfection and Deodorization System;
- Transfer Work Safety Management System;
- Incentive Mechanism for Working Vehicle Drivers;
- Reward and Punishment Measures for Drivers of the Transfer Squadron;
- Contingency Plan for Environmental Emergencies, etc.

According to the applicable laws and regulations, and ESS2, the Linwei District ESC should also establish or improve the following policies and procedures⁹ on labor management, designate/establish relevant management positions, and appoint dedicated staff for implementation:

- Improve the management policies and procedures on worker employment and working conditions: Add necessary clauses on labor contracts, ensure that labor remuneration is not lower than the local minimum salary standard, arrange flexible days off, and provide extra overtime pays as per the Labor Law, Labor Contract Law and Articles 10-12 of ESS2.
- Improve the management policies and procedures on OHS: Strengthen workplace OHS management, including the “three simultaneities” requirements for occupational protection facilities at the construction stage and occupational hazard screening at the operation stage, perform pre-job, on-the-job and post-job occupational health checkups for workers exposed to occupational hazards, offer regular OHS (including COVID-19 prevention and control) training, provide necessary PPE based on potential occupational hazards at the construction and operation stages as per the Law on the Prevention and Control of Occupational Diseases, the measures for “three simultaneities” supervision and management of occupational protection facilities, and Articles 24-30 of ESS2.

⁹ Since labor policies and procedures to be improved for different PIUs entails substantive similarities, this part explains the detailed requirements for the improvement of relevant systems/procedures for the first time. If there are no special requirements in the following part of the section, the details will not be repeated to reduce the thickness of this LMP.

- Establish management policies and procedures on contractor labor management: Strengthen contractor labor management at the construction and operation stages by improving existing personnel policies or developing special policies as per the Labor Law and Articles 31-33 of ESS2.
- Management policies and procedures on front end township and village cleaners: Direct and supervise the management of front end rural cleaners as per the Administrative Measures for the Development of Public Welfare Jobs of Shaanxi Province and Article 37 of ESS2.
- Improve worker GRMs: Improve worker GRMs, and ensure that GRMs include multiple channels, written records, disclosure and appeal procedures, etc. as per ESS2 and Appendix 1 to ESS10.
- Establish procedures on labor management performance monitoring and reporting: Monitor the labor management performance of contractors (including grievance redress) at the construction and operation stages, and report to the county / district PMOs regularly as per Articles 30, 32 and 37 of ESS2.

2) Linwei District Used Material Recycling Company

The established management policies of Linwei District Used Material Recycling Company include:

- Sorting and Transfer Management System
- Disinfection and Pandemic Prevention System
- Fire Safety System

Based on the social audit and SIA, Linwei District Used Material Recycling Company need to establish or improve the following labor management policies and procedures to comply with the applicable state regulations and ESS2:

- Establish management policies and procedures on employment and working conditions: Strengthen labor contract management and ensure the labor contract has necessary clauses, ensure that labor remuneration is not lower than the local minimum salary standard, arrange flexible days off, and provide extra overtime pays as per the Labor Law, Labor Contract Law and Articles 10-12 of ESS2.
- Improve the OHS management policies and procedures based on potential

OHS risks at the construction and operation stages (Refer to the corresponding part of **Linwei District ESC** for details);

- Improve the GRM for workers (Refer to the corresponding part of **Linwei District ESC** for details) ;
- Establish a labor management performance monitoring and reporting procedure (Refer to the corresponding part of **Linwei District ESC** for details) .

3) Township governments

Based on the social audit, the township governments pay cleaners and transfer workers monthly, distribute PPE regular, and implement relevant measures to regulate the driving safety of transfer workers, but still have gaps from the applicable state regulations and ESS2 in labor contract management, benefits, safety management, GRM, etc.

According to the applicable laws and regulations, and ESS2, the township governments should still improve the following labor management policies and procedures:

- Establish management policies and procedures on employment and working conditions for sanitation workers: Ensure that the labor contract includes necessary clauses, and that labor remuneration is not lower than the local minimum salary standard;
- Improve the safety management policies and procedures: Cover accident insurance for workers, and offer safety training (including COVID-19 prevention and control) regularly;
- Improve the written GRM for sanitation workers;
- Establish a labor management performance monitoring and reporting procedure;
- For townships providing waste transfer services through third parties, also establish policies and procedures to supervise and manage third party labor management performance.

5.2 Chengcheng County

1) Chengcheng County ESC

The established personnel and work safety management policies of the Chengcheng County ESC include:

- Implementation Rules for Bonuses for Urban Environmental Sanitation Management;
- Pre-job Training System for Cleaners;
- Health and Safety Management System;
- Fire Protection System;
- Disinfection System;
- Working Discipline;
- Job Duties of Drivers;
- Machinery Management System;
- Transfer driver management, traffic safety management, etc.

According to the applicable laws and regulations, and ESS2, the Chengcheng ESC should still improve the following labor management policies and procedures:

- Improve the management policies and procedures on employment and working conditions in terms of provisions on OHS risks management, leaves and break, overtime pay, minimum wages, etc. specified in the labor audit report. (Refer to the corresponding part of **Linwei District ESC** for details)
- Improve the OHS management policies and procedures based on potential OHS risks at the construction and operation stages (Refer to the corresponding part of **Linwei District ESC** for details);
- Establish policies and procedures on the labor management performance management of contractors (Refer to the corresponding part of **Linwei District ESC** for details);
- Establish management function extension policies and procedures for front end township and village sanitation workers to supervise their management (Refer to the corresponding part of **Linwei District ESC** for details);
- Improve the GRM for workers (Refer to the corresponding part of **Linwei District ESC** for details);
- Establish a labor management performance monitoring and reporting procedure (Refer to the corresponding part of **Linwei District ESC** for details).

2) Township governments

Similar to Linwei District, the township governments in Chengcheng County should still improve the following labor management policies and procedures:

- Establish management policies and procedures on employment and working conditions for sanitation workers: Ensure that the labor contract includes necessary clauses on OHS risks management, and that labor remuneration is not lower than the local minimum salary standards;
- Improve the safety management policies and procedures: Cover accident insurance for workers, and offer health and safety training (including COVID-19 prevention and control) regularly;
- Establish, adopt and enforce the formal GRM for sanitation workers;
- Establish a labor management performance monitoring and reporting procedure.

5.3 Chencang District

1) Chencang District Urban Administration and Law Enforcement Bureau

The Chencang District Urban Administration and Law Enforcement Bureau is a government agency, and its workers involved are mostly staff in management positions (direct workers) and contracted workers (community workers).

For staff in management positions

Staff in management positions are civil servants. The Chencang District Urban Administration and Law Enforcement Bureau has established a comprehensive labor management system for direct workers consistent with ESS2 in terms of the provisions on direct workers, and it is not necessary to prepare a separate LMP.

For contracted workers, the Chencang District Waste Management Service Center will establish policies and procedures to manage and monitor contractors' labor management performance.

2) Chencang District Waste Management Service Center

The established personnel and work safety management policies of the Chencang District Waste Management Service Center include:

- Waste Transfer and Staff Management System;
- Attendance Management System;

- Occupational Training and Learning System;
- Letter of Work Safety Responsibility;
- Vehicle Management System;
- Contingency Plan for Fire Safety;
- Contingency Plan for Work Safety in the Flood Season;
- COVID-19 Control Measures;
- Reception System for Complaint Letters and Visits.

According to the applicable laws and regulations, and ESS2, the **Chencang District Waste Management Service Center should still improve the following labor management policies and procedures:**

- Improve the management policies and procedures on employment and working conditions specified in the social audit report (Refer to the corresponding part of **Linwei District ESC** for details);
- Improve the OHS management policies and procedures based on potential OHS risks at the construction and operation stages (Refer to the corresponding part of **Linwei District ESC** for details);
- Establish policies and procedures on the labor management performance management of contractors (Refer to the corresponding part of Linwei District ESC for details);
- Establish management function extension policies and procedures for front end township and village sanitation workers to supervise their management (Refer to the corresponding part of **Linwei District ESC** for details);
- Establish, adopt and enforce the formal GRM for workers (Refer to the corresponding part of **Linwei District ESC** for details);
- Establish and enforce a labor management performance monitoring and reporting procedure (Refer to the corresponding part of **Linwei District ESC** for details).

2) Township governments

Similar to Linwei District, the township governments in Chengcheng County should still improve the following labor management policies and procedures:

- Establish management policies and procedures on employment and

working conditions for sanitation workers: Ensure that the labor contract includes necessary clauses, and that labor remuneration is not lower than the local minimum salary standard;

- Improve the safety management policies and procedures: Cover accident insurance for workers, and offer safety training (including COVID-19 prevention and control) regularly;
- Improve the written GRM for sanitation workers;
- Establish a labor management performance monitoring and reporting procedure.

5.4 Baoji City

The established personnel and work safety management policies of the Baoji City SWMC include:

- Work Attendance and Leave System
- Work Safety Responsibility System
- Machinery Management System
- Landfill Operating Standard Management System
- Environmental Protection and Monitoring Management System
- Machinery and Vehicle Management System
- Regulations on the Annual Review of Driving and Operating Licenses
- Reward and Punishment Regulations
- Regulations on Machinery and Vehicle Accident Handling
- Pandemic Prevention and Control Measures
- Contingency Plan for Flood Control
- Contingency Plan for Environmental Emergencies

According to the applicable laws and regulations, and ESS2, the SWMC should improve the following labor management policies and procedures:

- Improve the management policies and procedures on employment and working conditions (Refer to the corresponding part of **Linwei District ESC** for details);

- Improve the OHS management policies and procedures based on potential OHS risks at the construction and operation stages (Refer to the corresponding part of **Linwei District ESC** for details);
- Establish policies and procedures on the labor management performance management of contractors (Refer to the corresponding part of **Linwei District ESC** for details);
- Improve the GRM for workers (Refer to the corresponding part of **Linwei District ESC** for details);
- Establish a labor management performance monitoring and reporting procedure (Refer to the corresponding part of **Linwei District ESC** for details).

6. Age of employment

China's Labor Law (2018) defines minimum working age at 16, which is more stringent than the requirements of ESS 2 (14 years old).

Both China's Labor Law (2018) and Regulations on Special Protection for Underage Workers (1994) set out specific protection for underage workers (aged from 16 to 18). Underage workers should be prohibited in working in a few hazardous positions such in unhealthy, hazardous or toxic circumstance, during the night, with dangerous machinery, equipment or tools, or involving handling or transport of heavy loads. All underage workers should be registered with the local labor authority. A health examination will be carried out for an underage worker before onboarding, which will be carried regularly on a six-month basis until he/she reaches 18 years old.

Qualified candidates should have received undergraduate or above education, and driver candidates should provide appropriate driving licenses, and be above 18 years. By the end of August 2022, the Linwei District ESC's youngest worker was 32 years, Linwei District Used Material Recycling Company's youngest worker was 35 years, the Chengcheng County ESC's youngest worker was 26 years, the Baoji City SWMC's youngest worker was 32 years, and the Chencang District Waste Management Service Center's youngest worker was 27 years. The PIUs would ask each candidate to provide basic information (e.g., ID card, household register, diploma), which would be further verified by their human resources departments.

During the construction and operation of the Batch 1 subprojects, the PIUs are required to verify the identity and age of all workers to assure no child labor will be

employed. This will require workers to provide official documentation, which could include a birth certificate, national identification card, or medical or school record.

The project shall strictly adhere to provisions to prevent the involvement of child labor (below 16 years old) and any form of forced labor. If a child under the minimum age is identified working on the project, measures will be taken to immediately terminate the employment or engagement of the child in a responsible manner, considering the best interest of the child.

7. Management of direct workers

For direct workers, the PMOs and PIUs have established and implemented relatively sound provisions on employment terms and conditions. However, it is found in the social audit that some of them still have some gaps from the applicable state regulations and ESS2 in terms of employment terms and conditions (e.g., labor contract, salary and benefits, working hours, among others), OHS and GRM. The PMOs and PIUs commit in the ESCP that they will update and improve the relevant labor management policies and procedures before starting the implementation of respective first subproject, including non-discrimination principles in hiring practices and worker orientation (please see in the end of the section the template of the code of conduct for direct workers).

Based on the social audit and SIA, there are some gaps in the labor risk management of direct workers involved in front end collection facilities, and middle and back end facilities (transfer facilities, sorting center, landfill closure, etc.). Considering similarity in labor management procedures and policies for relevant PIUs, common requirements to mitigate gaps in labor management for different facilities are described below, followed by special requirements and additional considerations for respective county or district.

7.1 Front end collection facilities

In the Batch 1 subprojects, the counties / districts involving front end collection facilities are Linwei District, Chengcheng County and Chencang District. Direct workers involved in urban collection facilities mainly include sanitation workers employed by the Linwei District ESC, Chengcheng County ESC and Chencang District Waste Management Service Center, and those involved in rural collection facilities mainly include sanitation workers employed by the township governments. The measures and actions (specified in the social audit) to further improve the labor management of direct workers of the PIUs are described below, and special requirements added.

1) Direct workers involved in urban collection facilities

The Linwei District ESC, Chengcheng County ESC and Chencang District Waste Management Service Center should improve the following aspects as specified in the social audit:

- Strengthen labor contract management: Include clauses on “labor protection, working conditions and occupational hazard protection” in the labor contract, and ensure that the labor contract complies with the Labor Contract Law;
- Increase salary level: Increase salaries of cleaners at least to the prevailing local minimum salary standard;
- Establish and adopt a formal written GRM:
 - Improve the existing GRM for sanitation workers to align with ESS2 and ESS10, and extend to the county / district urban administration and law enforcement bureau;
 - Set up dedicated positions and designate adequate staff for labor management, and keep records properly;
 - Notify the GRM to workers before operation.

In addition, the **Chengcheng County ESC** should sign a formal labor contract with all direct workers; the **Linwei District ESC** and **Chengcheng County ESC** should improve the provisions on rest and overtime pay, arrange appropriate days off for workers by providing sufficient staff and conducting rotation, and provide reasonable overtime pay for extended working hours, consistent with China’s labor laws and regulations and ESS2.

2) Direct workers involved in rural collection facilities

Rural cleaners and transfer workers are employed and managed by township governments, being direct workers. The township governments and county / district environmental sanitation authorities should improve the following aspects as specified in the labor audit:

- **Strengthen labor contract management**: Ensure that all township governments sign formal labor contract with direct workers, and at least include clauses on “working hours, labor remuneration, labor protection, working conditions and occupational hazard protection” in the labor contract.
- **Strengthen labor risk management**: Ensure that all township

governments cover personal accident insurance for cleaners and transfer workers, get trucks insured, distribute sufficient PPE regularly, and offer traffic safety training regularly.

- **Establish and adopt a formal written GRM:** The county / district environmental sanitation authorities should direct and supervise the sanitation worker management of township governments.

7.2 Middle and back-end facilities

In the Batch 1 subprojects, middle and rear facilities include the WTSs in Linwei District, Chengcheng County and Chencang District, the sorting center in Linwei District, and landfill closure in Linwei District, Chengcheng County and Baoji City, and the PIUs involved include the Linwei District ESC (responsible for the O&M of the WTSs in Linwei District and Majiagou Landfill), Linwei District Used Material Recycling Company (responsible for the O&M of the Linwei District sorting center), Chengcheng County ESC (responsible for the O&M of the WTSs in Chengcheng County, Chengcheng Landfill and Yaotou Landfill), Chencang District Waste Management Service Center (responsible for the O&M of the WTSs in Chencang District, and truck maintenance center), and Baoji City SWMC (responsible for the O&M of the Changshougou Landfill). Compared to front end collection facilities, direct workers of middle and rear end facilities are exposed to occupational hazards, so occupational hazard protection measures are needed.

The measures and actions to further improve the labor management of the PIUs are described below, and special requirements added.

First, improve employment terms and working conditions.

- **Strengthen labor contract management:** Sign a labor contract with all direct workers, and its clauses (e.g., scope of work, workplace, remuneration, labor protection, working conditions, occupational hazard protection) should match the position, and be consistent with the Labor Law, Labor Contract Law and ESS2; for jobs involving occupational hazards, potential occupational hazards and their consequences, occupational protection measures, remuneration, etc. should be notified to workers when a labor contract is signed.
- **Set reasonable salary levels and benefits:** Ensure that salaries of all workers are not lower than the prevailing local minimum salary standards, and offer reasonable overtime pays.
- **Arrange days off flexibly.** Appropriate days off are arranged for workers by providing sufficient staff and conducting rotation based on actual work

arrangements as per the Labor Contract Law, and provide reasonable overtime pays for work beyond 8 hours or overtime on legal holidays.

Second, strengthen OHS management.

- Conduct “three simultaneities” management for occupational protection facilities at the construction stage, and appoint a qualified agency to identify potential occupational hazards at the operation stage;
- Set up a bulletin board at an easily visible place to disclose rules and regulations on occupational disease prevention and control, occupational hazard rescue, and occupational hazard screening results;
- Implement a routine occupational hazard monitoring policy;
- Provide free pre-job, on-the-job and post-job occupational health checkups to workers;
- Provide PPE and relevant regular training to workers.

Third, strengthen the GRM.

- Establish or improve internal GRMs, and extend to the county / district environmental sanitation authorities or competent authorities;
- Set up dedicated positions and staff responsible, keep records properly, and report to the county / district environmental sanitation authorities or competent authorities regularly;
- Notify GRM processes and contact information to workers before project construction.

Specifically, for **Linwei District Used Material Recycling Company**, establish formal safety management systems, including the work safety responsibility system, worker training system, comprehensive contingency plan, driver safety management system, safety operating regulations, machinery management system, etc.

The PIUs of landfill closure should take adequate occupational disease prevention and control as set out in the design, and closure and post-closure management plans, and safety protection measures, including developing measures against landslides, fires, explosions during closure, and offering safety training, including safe excavation of waste dump, landfill gas dispersion and explosion, and safe compaction of slopes, thereby protecting workers’ OHS.

Box: Code of Conduct Template

Code of Conduct (Template) for direct workers

As an employee, you are responsible to behave appropriately at work. We outline our expectations here. We can't cover every single case of conduct, but we trust you to always use your best judgement. Reach out to your manager or HR if you face any issues or have any questions.

Sexual Exploiting and Abuse (SEA) / Sexual Harassment (SA)

All workers, regardless of their sex, age, position, type of contract or status, have a responsibility to ensure that the workplace is free from sexual exploiting and abuse/ sexual harassment, to discourage and report unacceptable behavior and to comply with the company's SEA/SA policy.

Any violation of the Code of Conduct will be considered a serious misconduct.

Occupational Health and Safety

All workers should operate in a way that strictly follows the company's health and safety policies and procedures.

All workers are required to immediately report workplace injuries, illnesses or unsafe conditions.

Community Health and Safety

All workers should operate in a way that will not cause any harm to the health and safety of the communities.

YOU MUST:

- *Strictly follow the company's policies on the community health and safety management;*
- *Avoid conflicts with the community residents;*
- *Do not enter or remain in occupied premises if the resident is not present, without prior permission from the resident;*
- *Leave dangerous items, such as electrical wires, exposed;*

Acknowledgement

By certifying to the code of conduct, you acknowledge that:

For example:

- *You have read the entire code of conduct and understand your responsibilities related to it.*
- You agree to abide by its principles.*

8. Contractor management

According to the social audit and SIA, the Batch 1 subprojects may involve the following types of contractors:

- Construction contractors;
- Waste collection and transfer service providers; and

- Pollutant treatment service providers of landfills, such as leachate treatment plants and biogas power generation plants.

In general, contracted workers of similar facilities have similar risks and impacts, so common responsibilities of contractors of different facilities are described generally, followed by special requirements set out in the social audit and SIA to manage the risks.

1) Contractor responsibility requirements

General responsibility requirements:

Contractors and subcontractors (if any) should assume the following responsibilities (without limitation):

- Develop and implement an LMP and an OHS plan in accordance with the ESS2, including non-discrimination principles in hiring practices and worker orientation (please see below the templates of the code of conduct for contractors and contracted workers), which will be submitted to the PIUs for approval;
- Keep contracted worker recruitment and employment records;
- Notify job descriptions and working conditions to contracted workers;
- Establish and implement a GRM for contracted workers;
- Implement prevention and control measures for infectious diseases (e.g., COVID-19);
- Monitor, supervise and report health and safety issues related to infectious diseases (e.g., COVID-19);
- Strengthen worker awareness and training, and prevent and reduce spreading risks of infectious diseases (e.g., COVID-19);
- Strengthen worker awareness and training, and prevent and reduce SEA/SH risks;
- Establish a regular OHS performance review and reporting policy;
- Offer regular induction and OHS education and training to workers;
- Ensure that workers employed by all contractors have learned their job requirements before work;
- Update the LMP if necessary;

- Contractors should report the labor management performance of contracted workers to the PIUs monthly.

Special responsibility requirements for some special contractors:

For some facilities with different types of E&S risks or a higher risk rating, contractors should also assume certain other responsibilities, such as:

For landfill closure contractors: Establish a mechanism to avoid, minimize and manage the workplace OHS, including normative requirements for design and supervision, preparing a construction organization plan, designing safe construction processes and monitoring plans, and contingencies plans for landslides, fires, explosions, etc. offering pre-job safety training, taking construction quality assurance measures (e.g., prohibiting fires), providing sufficient fire-fighting, drainage and monitoring facilities, and strengthening safety management on both sides of the access road.

For rural collection service providers: Sign a formal labor contract with workers, which shall include the necessary information about scope of work, workplace, working hours, remuneration, working conditions, and occupational hazard protection if applicable, and cover social insurance for eligible workers.

For third party companies for landfill pollutant disposal: Have a valid work safety permit, a pollutant disposal qualification, and equipment and professional skills required to perform the contract; conduct occupational disease prevention and control properly, perform occupational hazard testing regularly, and provide occupational health checkups, PPE and trainings to workers exposed to occupational hazards.

2) Contractors management by PMOs and PIUs

The PMOs will review contractor qualifications, and ask all contractors to operate as per ESS2 and the ESCP.

Qualification review

As part of the process to select construction contractors who will engage contracted workers, the relevant PMOs will review the following information:

- Business licenses, registrations, permits, and approvals;
- Documents relating to a labor management system, including OHS issues, for example, LMPs and code of conduct (please see below the template of the code of conduct), including non-discrimination principles, provisions on prevention of SEA/SH at workplace, and accommodation of workers in

the case of presence in local communities.

- Identification of labor management, safety, and health personnel, their qualifications, and certifications;
- Sample labor contracts;
- Worker payroll records, including hours worked and pay received;
- Records of worker benefits;
- Workers' certifications/permits/training to perform required work;
- Records of safety and health violations, and responses;
- Accident and fatality records and notifications to authorities;
- Information in public records, for example, corporate registers and public documents relating to violations of applicable labor law, including reports from labor inspectorates and other enforcement bodies;
- Copies of previous contracts with contractors and suppliers, showing inclusion of provisions and terms reflecting ESS2.

Any contractor using child labor or with historic child labor use should not be eligible for bidding.

Box: Code of Conduct Template

A. Code of Conduct (Template) for Contractors

Message from the Top Management

Include a message about the contractor's commitment to ethics and the importance of the code of conduct.

Introduction

Provide information on how to use the code of conduct.

For example:

Who does it apply to?

Ethical Principles and Core Values

Provide an explanation of the contractor's core beliefs and values.

For example:

- *Honesty*
- *Integrity*
- *Trustworthiness*
- *Respect for others*
- *Accountability*

- *Obedience to the law*
- *Empathy*
- *Teamwork*

Grievance Redress Mechanism (GRM)

In this section, insert the Worker GRM, in addition to clearly indicate the contact numbers and communication channels, for example:

To report a concern:

- *Talk to your manager*
- *Website:*
- *E-mail:*
- *Phone number:*
- *Address:*
- *Other specific and accessible channels*

Outline the company's non-retaliation policy and the commitment of everyone to ensuring there is no retaliation for reporting concerns of any kind. State the company's position on punishment for retaliatory behavior. Make sure that the meaning of retaliation is clearly explained.

For example:

Workers who report a concern in good faith cannot be subjected to any adverse employment action including:

- *Unfair dismissal or suspension*
- *Unfair denial of a promotion or other employment benefit*
- *Bullying and harassment, either in person or online*

Discrimination

Outline the contractor's commitment to protecting workers' equal opportunity without discrimination.

For example:

The employment of project workers will be based on the principle of equal opportunity and fair treatment.

No discrimination with respect to any aspects of the employment relationship, including recruitment and hiring, wages and benefits, working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices.

Sexual Exploiting and Abuse (SEA) / Sexual Harassment (SA)

Explain the contractor's zero tolerance policy on SEA/SA at workplace

For example:

Treat all fellow employees, customers, business partners and other stakeholders with dignity and respect at all times.

Sexual exploitation refers to any actual or attempted abuse of a position or vulnerability; differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation or another.

Sexual abuse refers to an actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual Harassment can include any unwanted sexual advance, request for sexual favor, verbal or

physical conduct of a sexual nature

Any type of SEA/SA, including physical, verbal or other, is prohibited and can result in disciplinary action up to, and including, termination.

Community Health and Safety

Outline the contractor's commitment to protecting the health & safety of the surrounding communities

For example:

The site should operate in a way that will not cause any harm to the health and safety of the communities. you should adopt the following measures at all times:

- *Disclose information about the project, GRM and regular monitoring reports;*
- *Conduct consultation with residents, including vulnerable residents;*
- *Be polite and courteous at all times;*

YOU MUST NOT:

- *Use offensive language, or engage in loud or boisterous behavior;*
- *Comment on the property, the residents or their lifestyles;*
- *Interfere with or mistreat residents' animals or pets;*
- *Block private or common driveways, access paths, crossings, residents' parking areas or vehicles, without prior permission and not for longer than necessary;*
- *Enter or remain in occupied premises if the resident is not present, without prior permission from the resident;*
- *Leave dangerous items, such as electrical wires, exposed;*
- *Remain calm and polite in situations of disputes and refer any problems to us.*
Please call

Occupational Health and Safety

Outline the contractor's commitment to providing employees with a safe and healthy workplace.

For example:

The company operates in accordance with applicable health and safety requirements consistent with domestic requirements and ESS2 and strives for continuous improvement in its health and safety policies and procedures.

All employees are expected to perform their work in compliance with applicable health and safety laws, regulations, policies and procedures and apply safe work practices at all times in all locations.

Applicable safety and health requirements must be communicated to visitors or contractors at any company location.

Employees are required to immediately report workplace injuries, illnesses or unsafe conditions.

Environment and Social Risk Management

Outline the contractor's commitment to minimizing the environmental and social impact of all of its activities.

For example:

The company is committed to operating in an environmentally responsible manner, from the waste transportation, to the waste transfer and disposal, selection of suppliers and other activities.

The company complies with all applicable environmental laws and regulations as well as self-directed commitments to sustainable practices and environmental protection.

Forced Labor: The company and its suppliers shall employ all employees under their own free will with no one being subjected to forced labor.

Child Labor: The company shall not employ any people under the minimum legal working age of the country in which they work (16 years old in this project case).

Code of Conduct Acknowledgement

By certifying to the company code of conduct, you acknowledge that:

For example:

- *You have read the entire code of conduct and understand your responsibilities related to it.*
- *You have had the opportunity to ask questions to clarify any unclear aspects of the code.*
- *You agree to abide by its principles.*
- *You agree to report to the company any violations of the code.*
- *You agree to cooperate in any investigations of violations of the code.*

B. Code of Conduct (Template) for Contracted Workers

As an employee, you are responsible to behave appropriately at work. We outline our expectations here. We can't cover every single case of conduct, but we trust you to always use your best judgement. Reach out to your manager or HR if you face any issues or have any questions.

Grievance Redress Mechanism (GRM)

We provide the sound GRM for all the workers. (here clearly indicate the focal point, contact numbers and communication channels), for example:

All workers can report a concern via the following channels:

- *Talk to your manager*
- *Website:*
- *E-mail:*
- *Phone number:*
- *Address:*
- *Other specific and accessible channels*

Sexual Exploiting and Abuse (SEA) / Sexual Harassment (SA)

All workers, regardless of their sex, age, position, type of contract or status, have a responsibility to ensure that the workplace is free from sexual exploiting and abuse/ sexual harassment, to discourage and report unacceptable behavior and to comply with the company's SEA/SA policy.

Any violation of the Code of Conduct will be considered a serious misconduct.

Occupational Health and Safety

All workers should operate in a way that strictly follows the company's health and safety policies and procedures.

All workers are required to immediately report workplace injuries, illnesses or unsafe conditions.

Community Health and Safety

All workers should operate in a way that will not cause any harm to the health and safety of the communities.

YOU MUST:

- *Strictly follow the company's policies on the community health and safety management;*
- *Avoid conflicts with the community residents;*
- *Do not enter or remain in occupied premises if the resident is not present, without prior permission from the resident;*
- *Leave dangerous items, such as electrical wires, exposed;*

Acknowledgement

By certifying to the code of conduct, you acknowledge that:

For example:

- *You have read the entire code of conduct and understand your responsibilities related to it.*
- *You agree to abide by its principles.*

Procurement and contract management

The contracts with selected contractors will include provisions related to labor and occupational health and safety, as set out in ESS2 and China's regulations.

The PMOs will direct the PIUs to prepare labor management clauses in the bidding documents as per ESS2, such as the above responsibilities of contractors in contracted worker management, including workers employment terms and working conditions, OHS (including COVID-19 prevention and control measures), and GRM, and include relevant provisions in contract management (including remedies for relevant noncompliance). In case of subcontracting, the borrower will cause third parties to include equivalent requirements and nonconformity remedies in the contract with the subcontractor.

Monitoring

Contractors' labor management performance, including GRM establishment and implementation, will be subject to internal monitoring by the PIUs and external monitoring by the PMOs.

The PMOs will manage and supervise the performance of contractors, with focus on their contract compliance, possibly including regular auditing, on-site inspection and/or record review. Contractors' labor management records and reports may include (but not limited to):

- A representative sample of employment contracts or arrangements between third parties and contracted workers;

- Salary payment records;
- Days off;
- PPE distribution records;
- Records of training provided for contracted workers to explain labor and working conditions, and OHS;
- For facilities with occupational hazards, procedure of notifying workers of occupational hazards, occupational hazard screening and testing results, and records on free occupational health checkups offered to workers exposed to occupational hazards;
- Records relating to grievances received and their resolution (including the records for appropriately handling SEA/SH allegations);
- Reports relating to safety inspections, including fatalities and incidents and implementation of corrective actions;
- Trainings provided.

9. Community workers

Community workers involved in the Batch 1 subprojects mainly include rural front end cleaners and transfer workers in Linwei District, Chengcheng County and Chencang District, employed and managed by village committees. Most of them do public welfare jobs and are registered low income residents. They deal with farming mainly, but their agricultural income is low.

To make up the gaps between the existing management policies and ESS2, the township governments / village committees should improve their labor management procedures, with focus on the following aspects:

- Ensure that community workers work voluntarily;
- The Linwei District ESC, Chengcheng County ESC and Chencang District Waste Management Service Center should monitor and supervise community labor management performance in their respective service areas;
- Strengthen labor contract management: The village committees should sign a labor contract with all community workers, and the terms and conditions thereof (e.g., scope of work, workplace, working hours, remuneration, labor protection, working conditions, occupational hazard

protection) should be consistent with the Labor Law, Labor Contract Law and ESS2;

- Strengthen labor safety risk management: Cover personal accident insurance for community workers, distribute sufficient PPE regularly, and provide community workers with sufficient training (including COVID-19 prevention);
- Designate/establish management positions and assign qualified employees to manage and supervise the performance of community workers;
- Monitor, supervise and report health and safety issues (for instances, traffic accidents, COVID-19 prevention and control);
- Ensure that a GRM is available to community workers, and supervise its implementation;
- Implement relevant provisions in this LMP.

10. GRM

An effective and responsive GRM facilitates project progress by providing clear and accountable means for project beneficiaries and affected persons to raise complaints, including concerns of possible tensions and feelings of exclusion, as well as to seek remedies when they believe they have been affected by the project.

The Project involves direct, contracted and community workers. The PIUs will improve and establish sound GRMs for different types of workers according to ESS10 and its appendixes. The GRMs shall be designed to match the nature and scale of a project's potential impacts and risks, including channels, written records, procedure disclosure, transparent decision-making, appeal procedure, etc while complying with principles of confidentiality, data privacy and transparency. The final design of the GRMs will be validated and adjusted as needed during project implementation in consultation with relevant stakeholders to ensure its relevance and convenience of use. Workers who submit their comments, concerns or grievances have the right to request anonymity. Confidentiality will be declared during the process of disseminating GRM information.

1) GRMs for direct workers

Direct workers mainly include urban sanitation workers, and workers of transfer facilities, sorting center and closed landfills, including managers, drivers, operators, cleaners, file clerks, security guards, etc.

For urban sanitation workers, the grievance redress procedure is as follows:

Step 1: A worker may file a grievance to the foreman on duty;

Step 2: If the preliminary solution is unsatisfactory or no solution is provided, the worker may file the grievance to the squadron leader in charge;

Step 3: If the solution is unsatisfactory or no solution is provided, the worker may file the grievance to the brigade leader in charge;

Step 4: If the solution is unsatisfactory or no solution is provided, the worker may file the grievance to the personnel department of the Linwei District ESC, Chengcheng County ESC or Chencang District Waste Management Service Center, or urban administration and law enforcement bureau. Dedicated staff will accept and handle such grievance by means of telephone and face to face. In addition, the worker may file a grievance about any labor dispute to the mediation committee of the trade union, or file a grievance about any OHS issue to the work safety department.

For workers responsible for the O&M of transfer facilities, sorting center, truck maintenance center and closed landfills, the grievance redress procedure is as follows:

Step 1: facility level: A worker may file a grievance to the foreman on duty, and then to the person in charge of the facility;

Step 2: PIU level: If the preliminary solution is unsatisfactory, the worker may file the grievance to the PIU directly (Chengcheng County ESC, Linwei District ESC, Linwei District Used Material Recycling Company, Baoji City SWMC, Chencang District Waste Management Service Center, or Chencang District Waste Management Service Center);

Step 3: competent authority level: If the worker refuses to accept the solution, he/she may report to the human resources department, trade union or work safety department of the competent authority (city / district / county urban administration and law enforcement bureau, or Linwei District Federation of Supply and Marketing Cooperatives). Dedicated staff will accept and handle such grievance by means of telephone and face to face. In addition, the worker may file a grievance about any labor dispute to the mediation committee of the trade union, or file a grievance about any OHS issue to the work safety department.

Workers may also use anonymous ballot boxes installed at facilities and offices, and select any channel freely.

2) GRMs for contracted workers

Contracted workers mainly include contracted workers dealing with construction, and outsourced workers of waste collection and transfer services, and O&M of closed landfills.

For contracted workers dealing with construction and O&M of closed landfills, the grievance redress procedure is as follows:

Step 1: facility level: A worker may file a grievance to the foreman on duty, and then to the person in charge assigned by the third party to the facility;

Step 2: third party level: If the preliminary solution is unsatisfactory, the worker may file the grievance to the human resources department, trade union, work safety department or direct leader of the third party;

Step 3: PIU level: The worker may file the grievance to the PIU directly (Chengcheng County ESC, Linwei District ESC, Linwei District Used Material Recycling Company, Baoji City SWMC, Chencang District Waste Management Service Center, or Chencang District Waste Management Service Center).

For outsourced workers of rural waste collection and transfer services, the grievance redress procedure is as follows:

Step 1: team level: A worker may file a grievance to the team leader;

Step 2: third party level: If the preliminary solution is unsatisfactory, the worker may file the grievance to the human resources department, trade union, work safety department or direct leader of the third party;

Step 3: township government level: A worker may file a grievance to the township government directly.

3) GRMs for community workers

Community workers mainly include rural cleaners and transfer workers, and urban community cleaners. Existing community GRMs are working, and will be improved for the Project.

For rural cleaners and transfer workers, the main grievance channels are the village committee and township government. A worker usually files a grievance to the village committee; if the solution is unsatisfactory or no solution is provided, the worker will file a grievance to the township government; the worker may also

file a grievance to the township government, Linwei District ESC, Chengcheng County ESC or Chencang District Waste Management Service Center directly. The Linwei District ESC, Chengcheng County ESC and Chencang District Waste Management Service Center will direct and supervise the management of rural cleaners and transfer workers, including grievance redress.

For urban community cleaners, the main grievance channels are the community property management company, community committee and sub-district office. A worker usually files a grievance to the community property management company; if the solution is unsatisfactory or no solution is provided, the worker will file a grievance to the community committee or township government.

In addition, all types of workers may file grievances to labor and social security bureaus (competent agencies for labor management) or NGOs (federations of trade unions, women’s federations, etc.) by hotline, online platform, letter, visit, etc.

Table 12 External grievance redress channels for project workers

No.	Agency	Channel	
1	Labor and Social Security Bureau	Linwei District	<ul style="list-style-type: none"> Go to the Linwei District Labor and Social Security Bureau (11/F, District Administrative Service Center, Dongfeng Street, Linwei District). Call the Linwei District Labor and Social Security Bureau (0913-3030360) or the 12345 hotline.
		Chengcheng County	<ul style="list-style-type: none"> Go to the Chengcheng County Labor and Social Security Bureau (4/F, Human Resources Market, No.2 West Street, Chengcheng County). Call the Chengcheng County Labor and Social Security Bureau (0913-6866900) or the 12345 hotline.
		Baoji City	<ul style="list-style-type: none"> Go to the Baoji City Labor and Social Security Bureau (7/F, Building 1, Administrative Center, Chencang Avenue, Jintai District, Baoji City). Call the Baoji City Labor and Social Security Bureau (0917-3260200) or the 12345 hotline.
		Chencang District	<ul style="list-style-type: none"> Go to the Chencang District Labor and Social Security Bureau (3/F, main Building, Chencang District Resettlement Center). Call the Chencang District Labor and Social Security Bureau (0917-6212108) or the 12345 hotline.
2	Federation of trade unions	Linwei District	<ul style="list-style-type: none"> Go to the Linwei District Federation of Trade Unions (100m west of Yiqingli Street and Nantang Road, Linwei District). Call the Linwei District Federation of Trade Unions (0913-2022207) or the 12351 hotline.
		Chengcheng County	<ul style="list-style-type: none"> Go to the Chengcheng County Federation of Trade Unions (No.89 Dongxin Street, Chengcheng County). Call the Chengcheng County Federation of Trade Unions (0913-6712571) or the 12351 hotline.
		Baoji City	<ul style="list-style-type: none"> Go to the Baoji Municipal Federation of Trade Unions (8# Building, Baoji Municipal Administrative Center). Call the Baoji Municipal Federation of Trade Unions (0917-3261761) or the 12351 hotline.

No.	Agency		Channel
		Chencang District	<ul style="list-style-type: none"> Go to the Chencang District Federation of Trade Unions (1# Building, Chencang District Resettlement Center). Call the Chencang District Federation of Trade Unions (0917-6212108) or the 12351 hotline.
3	Women's federation	Linwei District	<ul style="list-style-type: none"> Go to the Linwei District Women's Federation (No.25 Minzhu South Road, Linwei District). Call the Linwei District Women's Federation (0913-2055300) or the 12338 hotline.
		Chengcheng County	<ul style="list-style-type: none"> Go to the Chengcheng County Women's Federation (No.89 Dongxin Street, Chengcheng County). Call the Chengcheng County Women's Federation (0913-6715663) or the 12338 hotline.
		Baoji City	<ul style="list-style-type: none"> Go to the Baoji City Women's Federation (13/F, Building 1, Administrative Center, Chencang Avenue, Jintai District, Baoji City). Call the 12338 hotline.
		Chencang District	<ul style="list-style-type: none"> Go to the Chencang District Women's Federation (1# Building, Chencang District Resettlement Center). Call the Chencang District Women's Federation (0917-6212823) or the 12338 hotline.

Note: This table was prepared by the social consulting agency in August 2022.

Project workers may also use the mediation procedure stipulated in the Labor Law:

Stage 1: The party proposing arbitration should file a written application to the labor dispute mediation committee within 60 days. Generally, the committee should make a decision within 60 days after receipt. If the parties have no objection to such decision, such decision will apply. The committee is composed of representatives of the labor authority, trade unions of the same level, and employers, and chaired by the representative of the labor authority.

Stage 2: If any party has an objection to the decision, it may file a suit in a people's court within 15 days after receipt.

It is necessary to establish a procedure to ensure that everyone is treated equally in similar cases, and that grievances are handled fairly, reasonably and timely. The GRM will be disclosed on the websites of the PIUs, contractors and government agencies. All workers will be informed of the GRM at the time of employment, and acquire details on its operation easily. Team leaders, site managers, and workplace representatives handling grievances should be familiar with the GRM, and be trained to implement it.

Once a grievance is received, the dedicated staff of the PIU will record and investigate it. Such record includes the date of receipt, grievor, brief description, measures taken (including remedy / solution / outcome), and closure date. The PIU staff should notify the grievor of the remedy / solution / outcome in writing or by

telephone or text message. All records and solutions will be reported to the Bank through annual E&S monitoring reports.

For SEA/SH-related grievances, the PMO/PIU will ensure the GRM having specific procedures to receive such grievances anonymously and addressed in a confidential manner. The PIU will have a male and female staff member available for such grievances, so that employees can choose to whom they wish to speak.

The PIU/PMO and contractors are committed to protecting the confidentiality of the grievances raised by workers and they will take the following measures to ensure that confidentiality of data be preserved properly, which are:

- To establish data confidentiality mechanism at all levels from community to the PMO to ensure data security,
- To conduct appropriate data protection training for employees who have permanent or frequent access to relevant data.
- To establish a reward and sanction mechanism for data protection

Direct workers, contracted workers and community workers who believe that they are adversely affected by the Project may submit complaints to the project-level GRMs or they can seek help from the Bank's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Workers may submit their complaint to the Bank's independent Inspection Panel. For information on how to submit complaints to the Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the Bank's Inspection Panel, please visit www.inspectionpanel.org.

As part of the scope of work for social external monitoring, the project's grievances handling will be monitored by the social monitor (to be hired by Shaanxi PMO) in order to verify the GRMs are functioning, and the all the complaints/concerns are appropriately addressed. The E&S external monitoring reports (to be submitted to the Bank semiannually) will be developed to keep track of all grievances submitted. PIUs will conduct internal grievance monitoring and report to PMOs quarterly, which shall include an analysis for the following indicators:

- Number of monthly received grievances (disaggregated by channel, gender, age);
- Categories of grievance received;

- Number of grievances resolved;
- Number of unresolved complaints;
- Timeframe for responding to or resolving complaints, etc.

11. Primary supply workers

Based on the social audit and SIA, the Batch 1 subprojects do not currently involve primary supply workers. Shaanxi PMO and city/county/district PMOs will follow up on it during the subproject implementation. In case primary supply workers involved in the future, relevant provisions of ESS2 will apply.

12. Project-related facilities

Based on the social audit, the Batch 1 subprojects have three related facilities¹⁰, including Weinan Urban WTE Plant, Chengcheng County WTE Plant and Baoji City WTE Plant. A labor management monitoring system will be established for them. As part of the project social monitoring, the PMOs shall arrange sufficient resources for monitoring to ensure that the management of different types of workers involved in project-related facilities is conforming with domestic regulations and ESS2 and will not pose any risk or particular uncertainty to the project operation.

¹⁰ Relevant facilities are those facilities which are not funded as part and are directly and significantly related to the project, carried out or planned to be carried out, contemporaneously with the project, and necessary for the project to be viable. However, the project is not one of the necessary pre-conditions to construct the relevant facilities.