

Environmental and Social Action Plan

ING LU MHP Project, Ukraine

IFC Reference: 29204

Date: April 9, 2010

Issue and reference to PS		Actions	Deliverable	Due Date
<p>PS1: Social and Environmental Assessment and Management System</p> <p>Improvement of the corporate EHS management system adequate to a multifunctional vertically integrated organization; consistent with international standards, such as ISO 14001 and OHSAS 18001</p>	1	Appoint suitable qualified environmental manager at the corporate level	Documents (C.V.) to IFC's satisfaction	December 2010
	2	Identify adequate authorities and functional responsibilities for new corporate environmental manager and recently assigned OHS manager	Documents (Role and Responsibilities and Organigram) to IFC's satisfaction	December 2010
	3	Develop corporate environmental and occupational health and safety organizational structure reflected functional communications of individual sites and corporate management	Corporate EHS organizational structure	December 2010
	4	Develop a corporate audit program for the EHS management system and legal compliance to be undertaken internally or by an external consulting companies to identify gaps and opportunities for improvement	Documents (Terms of Reference of the Audit, Audit Report and timetable for implementation of the Audit Recommendations) to IFC's satisfactions	January 2011
	5	Based on audit reports and recommendations, develop/update corporate EHS management programs focused on improvement of EHS management system and performance of core businesses, including poultry production and processing; feed production and crop growing.	EHS management programs for core businesses. Programs will incorporate objectives to be achieved; key performance indicators to measure performance and indication of responsibilities, resources and time for implementation of measures.	September 2011
	6	Implement corporate EHS programs in accordance with specified time frame	Report on progress in Annual Monitoring Report (AMR)	As specified in the Programs above
	7	Conduct ESIA studies for new or reconstructed on-site petrol stations, as requested by the national EIA regulations and IFC standards	Copies of ESIA summary	Prior to commissioning

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PS2: Labor and Working Conditions	8	Develop a procedure for internal monitoring, registering and reporting on incidents and near-misses	Corporate procedure	March 2011
Establishing an OHS communication and reporting system between corporate management and local sites	9	Develop procedure for dealing with actual and potential non-conformities and for taking corrective and preventive actions	Corporate procedure	April 2011
Enhancement of the corporate HR policy and grievance mechanism	10	Enhance corporate HR Policy by focusing on the management commitments to employees' rights for labor protection; reduction of staff turnover; HR organizational structure and responsibilities; internal communications.	Revised HR policy	March 2011
	11	Develop corporate grievance process consistent with IFC's Performance Standard 2	Corporate procedure	March 2011
PS 3: Pollution Prevention and Abatement	12	As a part of its corporate EHS management program (see item#5 above), identify adequate measures for improvement, including monitoring of actual amount of generated wastewaters and condition of sludge and receiving ponds to prevent potential leakage	Report on progress in AMR	Annually in the AMR
Wastewater management improvement				
Development of the comprehensive waste management system for MHP core businesses	13	Develop Waste Management Plan that encompass except of inventory of waste sources and types and will include proper methods for collection and temporary on-site storage of biological wastes prior to appropriate disposal; management responsibilities and proper staff training programs and monitoring of compost composition	Waste management plan for core businesses, including poultry production and processing and grain handling operations	July 2011; Report on progress in AMR
	14	Minimize or avoid use of asbestos containing materials (ACMs) in new construction and renovation	Corporate Resolution to avoid or minimize using ACMs, and ban using of PCBs in new construction and	July 2011

Issue and reference to PS		Actions	Deliverable	Due Date
Hazardous materials handling			renovation	
	15	Inventory of polychlorinated biphenyls (PCBs) and develop feasible actions for stepwise replacement of equipment containing PCBs	Inventory report and plan for replacement	July 2011
	16	Develop a formal documented Pesticide Management Plan which will cover the areas of pesticide selection and handling, application and storage, staff training, safety requirements, and disposal	Pesticide Management Plan	November 2011
Reduction of GHG emissions	17	Develop a program for reduction of GHG emissions and report annually on the progress to IFC	Program for reduction of GHG emissions; Report on progress in AMR	October 2012; Annually
PS4: Community health, safety and Security Reduce potential risks to community health and safety	18	Conduct studies to confirm that drug and pesticide residues poultry products meet maximum residue limits (MRLs) recommended by the World Health Organization (WHO) and Food and Agriculture Organization; and will undertake corrective actions, if needed to comply with MRLs	Report on compliance with MRLs including correction action plan ; reporting on the plan implementation	April 2012; and annually in AMR
PS1: Enhancement of communication with communities and third interested parties	19	Disclose information about environmental and social aspects of the proposed IFC investment locally in an appropriate manner	Document to IFC's satisfaction	Before IFC Board approval
	20	Establish a set of corporate procedures for handling grievances of third parties including affected communities	Corporate procedures for grievance mechanism	November 2011