

ENVIRONMENTAL AND SOCIAL ACTION PLAN – CPM, Fort Songadh, Surat

#	Action	By whom	Deadline
1	Provide IFC with copies of Consent to Establish and Consent to Operate obtained for CPM.	B P Biyani	Copies of both the consents will be submitted as soon as they are received from GPCB.
2	Obtain updated authorizations from GPCB under the Hazardous Waste (Management and Handling) Rules to include additional hazardous wastes identified in ERS	B P Biyani	Additional hazardous waste identified in ERS will be included in authorization by June 2006.
3	Provide IFC with a written report documenting resettlement of workers from Khetibadi colony at CPM, including relocation process, consultations undertaken, number of people affected, and outcomes achieved. Submission of report satisfactory to IFC to be condition of first disbursement.	B P Biyani	On or before February 10 2006.
4	Complete process changes at both JKPM and CPM to eliminate the use of elemental chlorine at both plants.		Within 6 years of IFC first disbursement.
5	Develop an action plan for ongoing community consultation and disclosure program, in consultation with IFC.	B P Biyani	On or before March 31 2006.
6	Develop and implement a certifiable occupational health and safety (EHS) management system based on OHSAS 18000 standards.	B P Biyani	On or before March 31 2007.
7	Adopt Integrated Pest Management (IPM) program that reduces corporate reliance on synthetic pesticides.	B P Biyani	On or before December 31 2006.
8	Implement measures including, if necessary, design modifications to ensure that air emissions from existing and proposed new facilities meet WBG and host country guidelines.	B P Biyani	On or before December 31 2006.

9	Implement measures to ensure that ambient air quality at CPM plant meets WBG and host country guidelines.	B P Biyani (for CPM)	WBG norms will be achieved on or before December 31 2006.
10	Develop expanded water conservation and recycling action plan for existing and proposed facilities at CPM.	B P Biyani	On or before March 31 2006.
11	Develop plan to further reduce AOX levels to 0.4 Kg/t, in accordance with WBG guidelines for Pulp and Paper Mills.	B P Biyani	After commissioning of ODL, AOX content in our treated effluent has reduced to 0.84 Kg/Tn of AD pulp. During the last quarter of the year 2006 we are going to substitute second hypo stage of bleaching by Chlorine Dioxide which will reduce AOX content further. Once the plant becomes ECF as per clause 4 above, we believe this will be achieved.
12	Include EHS requirements in tender documents and standard operating procedures, for construction contractors.	B P Biyani	On or before February 2006.
13	Install necessary equipment and implement appropriate management system for prevention, detection and control of fire, electrocution and spills.	B P Biyani	On or before December 31 2006.
14	Provide written confirmation to IFC that lime kilns at both CPM and JKPM have been completed, received regulatory approval and commissioned.	B P Biyani (for CPM)	On or before December 31 2007.

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