

TRIO INVEST (24492)
ENVIRONMENTAL ACTION PLAN (EAP)

	Task Description	Output	Required Completion/Submittal Date
1.	<u>Present Environmental Impact Assessment (EIA) for the construction of both access road and railroad spur.</u> The Project includes the construction of both access road and connection to an existing railroad line. Under Russian legislation new developments are required to carry out an environmental impact assessment (EIA) study to identify, avoid or mitigate potential environmental and social risks associated with the project.	IFC receipt of EIA report and evidence of compliance with national and IFC requirements. List of corrective measures and proposed schedule for implementation of required measures to close top priority gaps between actual operations and IFC guideline requirements is required.	Condition of disbursement
2.	<u>Complete Environmental Impact Assessment-Identified Corrective Actions.</u> Complete required corrective measures to close Environmental Impact Assessment-identified gaps.	IFC receipt of Management-certified completion of top priority corrective measures required to comply with IFC guidelines.	Condition of disbursement
3.	<u>Establish Integrated Management Unit for Environmental Affairs, and Occupational Health and Safety (OHS) Management.</u> Assign qualified environmental and OHS manager/specialist(s) for Trio operations.	Provide copies of internal memoranda signed by Trio Invest highest-level management announcing the establishment of management unit, purpose for and the objectives of the unit. Submit CVs for assigned staff.	Prior to Construction start-up.
4.	<u>Develop Social and Environmental Affairs, and OHS Management Policy Statement.</u> Develop statement of vision and mission for environmental affairs and OHS management.	Provide copy of approved policy statement for IFC endorsed by Trio highest-level management.	Prior to Construction start-up.
5.	<u>Develop and Implement an Integrated Management System for Social and Environmental Affairs, and Occupational Health and Safety Management.</u> Establish an integrated management system based upon internationally recognized management systems such as ISO 9001-2000, ISO 14000, and OHSAS 18000. Design the system to ensure compliance with Russian regulations and IFC policies and guidelines requirements. This activity to be implemented according to a 4 stage process as follows: <ul style="list-style-type: none"> ➤ Stage 1 – Design of the management system. ➤ Stage 2 – Detailed development of procedures. ➤ Stage 3 – Initial audit of all activities and installations (against standards defined in the system and as per established procedures). ➤ Stage 4 – Implementation of the management system. 	<ul style="list-style-type: none"> ➤ Stage 1 – provide copy of the report describing the management system to IFC. ➤ Stage 2 – Provide copies of procedures for IFC. ➤ Stage 3 – Provide IFC with list of all corrective actions required by the initial audit and detailed schedule. ➤ Stage 4 – Submit progress report demonstrating complete implementation of all procedures. 	<ul style="list-style-type: none"> ➤ Stage 1: Condition of disbursement. ➤ Stage 2: Condition of disbursement + 12 months ➤ Stage 3: Condition of disbursement + 18 months ➤ Stage 4: Condition of disbursement + 24 months
6.	<u>Develop and Implement Environmental Monitoring Program for Hazardous Materials and Waste.</u> As part of the integrated management system for environmental and social affairs and occupational health and safety, develop monitoring protocols, procedures, corrective measures and commence quantitative data collection for ammonia and CO ₂ . This will ensure that all hazardous	<ul style="list-style-type: none"> ➤ Task 1 - Submit procedures for ammonia and CO₂ handling, usage and disposal. ➤ Task 2 - Complete inventory of all hazardous materials proposed for use in Trio Invest operations; submit inventory to IFC; 	<ul style="list-style-type: none"> ➤ Task 1 and 2: Condition of Disbursement. ➤ Task 3- At facility startup. ➤ Task4 - Condition of

	materials used or stored at the facilities by any party, and all solid and hazardous wastes generated by these facilities are managed and disposed of in an environmentally sound and legal manner.	<ul style="list-style-type: none"> ➤ Task 3 - Submit results of CO₂ base-line measurements on all point sources. ➤ Task 4 – Implement all procedures and corrective actions. 	Disbursement + 24 months.
7.	<u>Develop and Implement an Environmental and Occupational Health and Safety Management Plan for the Construction Phase of Trio's new Warehouse.</u> This plan will include procedures that will guarantee all construction works are managed and conducted according to Trio's established environmental affairs, and occupational health and safety management standards, as well as Russian and World Bank/IFC policies and guidelines.	Present management plan including procedures to IFC.	Prior to Construction start-up.
8.	<u>Implement Environmental, Occupational Health and Safety specifications for third party contracted services during construction and operation of Trio's operations.</u> All contractors will follow Trio's developed Environmental, Occupational Health and Safety specifications.	Present technical specifications to IFC.	Prior to Construction start-up.
9.	<u>Demonstrate Facility Design Compliance with Russian Federation Life and Fire Safety requirements.</u> Documentation shall clearly demonstrate that the facility has been designed to comply with Russian life and fire safety requirements.	Submit certification of design adequacy and compliance with Russian Federation regulatory requirements.	Prior to Construction start-up.
10.	<u>Demonstrate Facility Construction Compliance with Russian Federation Life and Fire Safety Engineering and operations requirements.</u> Construction should be implemented faithfully in accordance with the approved design.	Submit certification of facility construction compliance with Russian Federation regulatory requirements.	Prior to facility startup
11.	<u>Prepare and submit proposed consolidated annual environmental monitoring report (AMR) format for IFC approval.</u> Devise and submit proposed annual monitoring report format to IFC. Report should be designed to facilitate IFC's understanding of the compliance status of all facilities, outstanding compliance issues and target resolution dates, and the results of benchmarking activities among the Company's operations. The report should be designed to have maximum utility for Trio's management and informational brevity for IFC.	Submit Proposed Format to IFC for Approval.	Condition of Disbursement