

Banvit (25711)
Corrective Action Plan (CAP)

	Action	Deliverable	Deadline
1.	<p>EH&S Position at Corporate Level Banvit will either designate or hire an individual or individuals within the organization with specific responsibility and authority for all environmental, health and safety, labor and social matters at the company including contract operations such as broiler and breeder farms, seasonal labor, etc. The individual's role will be clearly defined, including a written job description, and sufficient management authority and resources will be provided to ensure compliance with relevant and applicable laws and regulations.</p>	<p>Documentary Evidence</p> <ul style="list-style-type: none"> - position creation - reporting line - hiring notice - budget allocation 	<p>Condition of First Disbursement</p>
2.	<p>Extend and Integrate Management System for Environment, Social, and Health and Safety (ESHS) Extend and integrate into its existing environmental management system (i) social assessment and management of risk and (ii) comprehensive oversight of ESHS for all its own, contracted or leased operations in Turkey and Romania. The management system will incorporate the following elements: (i) organizational capacity; (ii) training; (iii) community engagement, including clear procedure on disclosure and consultation with affected communities; (iv) monitoring; and (v) reporting. The management program will address identified environmental & health and safety impacts and risks of all existing and future acquisitions and operations.</p>	<p>Documentary Evidence</p>	<p>FD + 180</p>
3.	<p>Update Human Resources Policy</p> <ul style="list-style-type: none"> (i) Review and update their Human Resources Policy to ensure documented consistency with Turkish laws and IFC Performance Standards, including specific references to non-discrimination, freedom of association and collective bargaining and child labor and forced labor. Review will be by a qualified attorney retained by Banvit for the purpose. (ii) Update documentation if needed and implement policy at a corporate level for all operations for all its own, contracted or leased operations in Turkey and Romania. 	<p>Documentary Evidence</p>	<ul style="list-style-type: none"> (i) FD + 180 (ii) FD + 240
4.	<p>Land Acquisition Procedure</p> <ul style="list-style-type: none"> (i) Develop a procedure in compliance with IFC Performance standard on Land acquisition for future land acquisition processes. (ii) Update documentation if needed and implement this procedure at a corporate and at each operation for all its own, contracted or leased operations in Turkey and Romania. 	<p>Documentary Evidence</p>	<ul style="list-style-type: none"> (i) FD + 180 (ii) FD + 240
5.	<p>Community Engagement</p> <ul style="list-style-type: none"> (i) Develop a community engagement plan which will include disclosure of environmental and social information and consultation with affected communities, implementation of grievance mechanism. The plan needs to specify person responsible, actions, timing, budget and management oversight. Specific topics to be addressed will include the following: <ul style="list-style-type: none"> • Information sharing and consultation with nearby communities, and an emergency response plan with regards to risks from avian influenza. • Formal grievance mechanism (ii) Implementation of community engagement plan. 	<p>Community engagement plan</p>	<ul style="list-style-type: none"> (i) FD + 180 (ii) FD + 360

	Action	Deliverable	Deadline
6.	<p>Land Application of Wastewater Banvit will develop a groundwater monitoring plan to quantify the impact to groundwater from storage and irrigation of wastewater from feedlot and related operations. Review will be conducted by qualified professional acceptable to IFC. TOR for study will be developed in consultation with IFC.</p> <ul style="list-style-type: none"> (i) Retain consultant to complete groundwater study (ii) Final report with recommendations and implementation schedule (iii) Implementation of recommendations (iv) Reporting of groundwater monitoring data 	<ul style="list-style-type: none"> (i) Copy of contract and TOR (ii) Copy of final report (iii) Documentary evidence (iv) Monitoring Report 	<ul style="list-style-type: none"> (i) FD + 60 (ii) FD + 180 (iii) FD + 360 (iv) FD + 360
7.	<p>Miscellaneous Wastewater Banvit will review its management of process, sanitary, miscellaneous wastewaters and stormwater from all its facilities in a manner consistent with good international industry practices, and in compliance with applicable WB/IFC guidelines. Review will be conducted by qualified professional acceptable to IFC. TOR for study will be developed in consultation with IFC.</p> <ul style="list-style-type: none"> (i) Retain consultant to complete wastewater study (ii) Final report with recommendations and implementation schedule (iii) Implementation of recommendations (iv) Reporting of sanitary, miscellaneous wastewaters and stormwater data 	<ul style="list-style-type: none"> (i) Copy of contract and TOR (ii) Copy of final report (iii) Documentary evidence (iv) Monitoring Report 	<ul style="list-style-type: none"> (i) FD + 60 (ii) FD + 180 (iii) FD + 360 (iv) FD + 360
8.	<p>Air Emissions Banvit will (i) review emissions from its facilities, associated facilities and contract or leased operations for compliance with applicable WB/IFC guidelines and greenhouse gas emissions, and (ii) review and update as needed existing program for its out growers to facilitate switching from coal burning furnaces to locally available natural gas or cleaner fuel alternatives. Review will be conducted by qualified professional acceptable to IFC.</p> <ul style="list-style-type: none"> (i) Retain consultant to complete air emissions study (ii) Final report with recommendations, implementation schedule and budget allocation (iii) Implementation of recommendations and independent verification (iv) Reporting of air emissions data 	<ul style="list-style-type: none"> (i) Copy of contract and TOR (ii) Copy of final report (iii) Documentary evidence (iv) Monitoring Report 	<ul style="list-style-type: none"> (i) FD + 60 (ii) FD + 180 (iii) FD + 360 (iv) FD + 360