

Balrampur Chini Mills Limited
Environmental And Social Action Plan

Date: February 26, 2007

#	Action	Balrampur	Tulsipur	Rauzagaon	Babhnan	Kumbhi	Gulharia
1.	Implement EHS Management System certified to ISO 14001 and OHSAS 18001 standards with IFC Performance Standard requirements appropriately incorporated	June 2008	October 2008	October 2008	October 2008	March 2009	March 2009
2.	Appoint a fulltime senior executive at the corporate level for oversight of EHS aspects across all of BCML's operations	June 2007					
3.	Designate at least one person at each operating facility as EHS manager	Prior to first disbursement	Prior to first disbursement	Prior to first disbursement	Prior to first disbursement	Prior to first disbursement	Prior to first disbursement
4.	Develop and implement EHS standards for contractors and their sub-contractors and ensure adherence to the EHS standards during construction and operation	June 2007	June 2007	June 2007	June 2007	June 2007	June 2007
5.	Prominently display the Standing Orders (conditions of work), in the local language at each of its plant and project locations	June 2007	June 2007	June 2007	June 2007	June 2007	June 2007
6.	Develop and implement an employee grievance redress procedure consistent with PS2 requirements	December 2007	December 2007	December 2007	December 2007	December 2007	December 2007
7.	Upgrade the disciplinary procedure to make it consistent with IFC PS2 requirements	June 2008	June 2008	June 2008	June 2008	June 2008	June 2008
8.	Articulate a maternity leave and benefits policy in accordance with host country requirements	October 2007	October 2007	October 2007	October 2007	October 2007	October 2007
9.	Develop and implement an occupational health and safety program as detailed in the ESRS under PS2	December 2007	December 2007	December 2007	December 2007	June 2008	June 2008

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10.	Put in place a departmental and plant level safety committee comprised of both management and worker representatives.	October 2007	October 2007	October 2007	October 2007	June 2008	June 2008
11.	Upgrade the program on enhancing farmer awareness on safe pesticide handling and use.	December 2007	December 2007	December 2007	December 2007	June 2008	June 2008
12.	For each location, map the groundwater drawdown profile on account of groundwater extraction.	-	-	-	-	March 2007	March 2007
13.	Develop an action plan to ensure that particulate matter emissions remain within meet IFC limits	June 2007	June 2007	June 2007	June 2007	-	-
14.	Implement a monitoring program, including for RPM monitoring in stack emission and RSPM monitoring in ambient air, to demonstrate compliance with IFC norms and if required implement measures to meet IFC limits	During and within the first year after disbursement	During and within the first year after disbursement	During and within the first year after disbursement	During and within the first year after disbursement	During and within the first year after disbursement	During and within the first year after disbursement
15.	Upgrade management of hazardous materials and wastes in accordance with IFC guidelines on hazardous materials management and as detailed in the ESRS at PS3.	December 2007	December 2007	December 2007	December 2007	-	-
16.	Implement a companywide Bagasse Ash Disposal Management Plan, which defines: appropriate selection criteria for land to be used for filling with bagasse ash; prohibited fill and disposal areas and techniques; and criteria for compaction, drainage and final cover	March 2008	March 2008	March 2008	March 2008	October 2008	October 2008
17.	Develop and disseminate to cane growers a Pesticide Handling/ Management Guideline consistent with IFC Performance Standard 3 requirements	June 2007	June 2007	June 2007	June 2007	June 2008	June 2008

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18.	Develop and Implement a program to improve awareness of farmers on IPM, IVM and safe pesticide handling	June 2008	June 2008	June 2008	June 2008	June 2008	June 2008
19.	Develop and Implement a Security Personnel procedure, consistent with IFC Performance Standard 4	June 2007	June 2007	June 2007	June 2007	June 2007	June 2007
20.	Prepare and implement an onsite and offsite disaster management plan and link it to the district emergency response plan	October 2007	October 2007	October 2007	October 2007	October 2007	October 2007
21.	Develop and Implement a community grievance redress procedure for receiving and responding to community complaints	October 2007	October 2007	October 2007	October 2007	October 2007	October 2007