

Columbus (25912), Environmental and Social Action Plan – May 19, 2008

Item	Action	Completion Indicator	Timetable
PS1: Social and Environmental Assessment and Management Systems			
1	Columbus will provide regular information to IFC on the status of its permits and status of approvals for its onsite contractors.	Columbus has obtained its permits / approvals for water use, air emission (APPA), waste storages, and provided them to IFC. Columbus has caused its onsite contractors to obtain their permits / approvals for water use, air emission (APPA), waste storages, as applicable, and provided them to IFC.	Update to be provided before disbursement. If events beyond the Company's control cause delay, the Company will-inform IFC in a timely manner and provide an expected date for permit issuance.
PS2: Labor and Working Conditions			
2	Columbus will extend OHREP to cover all contractor work areas and employees.	Columbus has extended (or has caused to extend) OHREP and provided the profiles to IFC.	By December 2008 or three months after first disbursement, whichever comes first.
3	Columbus will also ensure that adequate workplace monitoring is conducted by the main contractor operating in the plant area, particularly the contractors involved with slag management and waste management	3.1 Columbus has provided to IFC the workplace monitoring results. 3.2 Columbus has developed (or has caused the contractors to develop) an Action Plan to address the areas of concern, if any, and this plan has been submitted and agreed with IFC.	3.1 By December 2008 or three months after first disbursement, whichever comes first. 3.2 Six months after submittal of the workplace monitoring results.
4	Columbus will cause all onsite contractors to use adequate PPE, their workers to be subject to medical surveillance and examinations, and contractors to ensure safe working conditions to their workers.	Columbus has provided to IFC evidence that the conditions are met for all onsite contractors.	By six months after completion of Action 3.
PS3: Pollution Prevention and Abatement			
5	Columbus will revise the monitoring program to ensure that representative testing is conducted and meets IFC emission guidelines. Columbus will prepare a plan to increase the number of stack emission points which are subject to continuous	Columbus has revised the air emission monitoring program and IFC has reviewed and agreed with it.	By December 2008.

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	monitoring for dust.		
6	Columbus will assess the content of heavy metals in particulate matter emitted from existing stacks, as well as in ambient air PM10.	6.1 Columbus has submitted the assessment to IFC. 6.2 If heavy metals are present in the particulate matter in concentrations that may represent a health risk, Columbus has developed a plan to further reduce emissions, submitted it to IFC and IFC has accepted it.	6.1 By December 2008. 6.2 By December 2009.
7	Columbus will develop a Fugitive Dust Control and Abatement Program to reduce fugitive emissions from all areas.	Columbus has developed and submitted the Program to IFC. IFC has reviewed and accepted it.	By December 2008 or three months after first disbursement, whichever comes first.
8	Columbus will regularly update the air emission dispersion model. Columbus will review the location of the monitoring station, to ensure that the monitoring data are representative of the air quality conditions at the closest residential receptors.	Columbus has updated the model before commissioning of the new cold-rolling mill and subsequently every two years or in case of a major change in the emissive pattern due to modified plant operations. Columbus has reviewed the location of the monitoring station and provided evidence to IFC that the location is representative.	Before commissioning of the new cold-rolling mill.
9	Columbus has developed a plan to install double HDPE liners with leachate control and underdrain control in all its storage ponds and dams which can be used to collect contaminated water. Columbus will also construct a new Dam 6 to collect all potential contaminated runoff from the slag management areas. Columbus will ensure that all slag material stockpiles are adequately stored within Dam 6 drainage area and stockpiles located outside this area are removed.	Columbus has installed the liners in all its storage ponds and dams, and constructed Dam 6.	By December 2009.
10	Columbus will add to its surface water monitoring network, two new stations along the Klein Olifants river, located immediately upstream and downstream of the confluence of Vaalbank spruit.	Columbus has started monitoring and provided the results to IFC.	By August 2008.

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11	Columbus will implement noise monitoring at plant boundaries.	Columbus has included noise monitoring in its environmental monitoring program and started monitoring.	By December 2008.
12	Columbus will provide the filter cake storage area with a cover and adequate bunding to prevent runoff contamination	Columbus has installed a roof and containment.	By December 2008.
13	Columbus will continue to work for the development of an Energy Reduction Investment Program.	Columbus has developed the Program and presented it to IFC.	By December 2009.
PS4 Community Health, Safety and Security			
14	Columbus will monitor that its transport contractors comply with regulations and good practice to minimize risks associated to dangerous goods transport, particularly with regard to selected transport routes and implementation of incident prevention measures.	Columbus has developed a specific monitoring procedure and presented it to IFC. IFC has reviewed and accepted it.	By December 2008.
PS6 Biodiversity and Sustainable Natural Resource Management			
15	Columbus will reinstate the old borrow pits, taking into consideration biodiversity protection elements.	The borrow pits have been reinstated.	As soon as Columbus receive government approval.