

ATATEKS (23676)
Environmental and Social Action Plan (ESAP)

	Action	Deliverable	Deadline
Integrated Management System			
1.	EHS&S Position at Corporate Level Atateks will appoint one suitably-qualified individuals acceptable to IFC to have responsibility and authority for all environmental and health and safety matters at the company. The 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.	Provide IFC with documentary evidence of: - position creation - reporting line - hiring notice - CVs of appointees	COD
2.	Environmental and Social Assessment (i) Atateks will include review of environmental, health & safety, human resources and social issues consistent with IFC Performance Standards as part of their due diligence process. (ii) Atateks will produce an ESIA for any Greenfield project in accordance with IFC Performance Standards.	(i) Documentary Evidence to IFC's satisfaction (ii) Deliver ESIA to IFC for review and comment.	(i) LS + 6 months (ii) Prior to construction of Egypt site or any other new Greenfield project.
3.	Implement an Integrated Management System (ESMS) for Environment, Health & Safety, Human Resources and Social matters at company Atateks will consolidate all current systems into an integrated management system that will incorporate the following elements: (i) staff responsible for EHSS issues; (ii) training on EHSS issues (e.g. environmental permitting; occupational health and safety; life and fire safety; working conditions and terms of employment; solid waste management; etc); (iii) community engagement; (iv) monitoring; and (v) reporting. The management system will address identified environmental, health and safety, human resources and social impacts and risks at all current and future operations.	Part 1: Submission of the ESMS framework and implementation plan Part2: ISO14001, OHSAS 18001 and SA8000 certification	Part1: LS + 6 months Part 2: LS + 2 years
Labor and working conditions			
4.	Human Resources at Corporate Level Atateks will appoint a suitably-qualified individual acceptable to IFC to have responsibility and authority for all human resources matters at the company. 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	Provide IFC with documentary evidence of: - position creation - reporting line - hiring notice	COD

	regulations.	-	CV of appointee	
5.	Workers' organization (i) Atateks will ensure that workers' representative at the Corlu and Jordan facilities are elected by the workers through a voting system. (ii) Atateks will also provide a clear description of the function and training to all workers' representative and workers in order to ensure that they understand the functions of the position and the responsibilities towards workers.	(i) Provide IFC with documentary evidence (ii) Provide description of function and training content	(i) COD (ii) LS + 6 months	
6.	Screening mechanism for outsourcing operations (i) Atateks will develop a screening mechanism in order to ensure that outsourced supplier companies comply with national regulation regarding environmental, health and safety and social aspects. (ii) Atateks will also ensure that EHS and terms of employment provisions are included in contracts with these companies, and that these companies implement these provisions to address these issues consistent with PS2. Indicators will be developed to ensure monitoring of performance.	(i) Provide IFC with example of screening mechanism implemented (ii) Provide IFC with example of contract	(i) LS + 1 year (ii) LS + 1 year	
7.	Workplace Monitoring (i) Atateks will develop a workplace monitoring program which will include fumes, temperature, noise, and Volatile Organic Compounds (VOCs). (ii) Corrective actions will be implemented according to an implementation plan to be presented. (iii) Monitoring data will be submitted as part of the Annual Monitoring Report (AMR).	(i) Provide IFC with workplace monitoring program (ii) Provide IFC with implementation plan (iii) Monitoring data in AMR	(i) LS + 6 months (ii) LS + 1 year (iii) AMR	
8.	Accident Monitoring and Reporting Atateks will ensure that the accident monitoring program they have implemented at the plant in Corlu is also implemented at all their facilities.	Provide accident statistics for all plants in the format provided by Corlu	LS + 6 months	
9.	Assessment of Health and Safety risks for all operations (i) Atateks will do an OHS risk assessment at all their operations including all aspects listed in WBG/IFC guidelines. This will include risk and impacts of VOCs. (ii) Corrective actions will be implemented according to an implementation plan to be presented.	(i) Provide IFC with OHS risk assessment report (ii) Provide IFC with implementation plan	(i) LS + 6 months (ii) LS + 1 year	
Pollution Prevention and Abatement				

10.	Liquid effluent monitoring at Corlu Atateks will monitor and report all parameters (TSS, oil and grease, heavy metal, color, total phosphorus, ammonia, and total nitrogen), as per IFC guidelines, for industrial wastewater at their operations. (i) Monitoring report with recommendations and implementation schedule (ii) Implementation of recommendations (iii) Reporting of wastewater for all facilities	(i) Copy of final report (ii) Documentary evidence (i) Monitoring Report	(i) LS + 6 months (ii) LS + 1 year (iii) Annual Monitoring Report
11.	Energy Audit Atateks will undertake an Energy Audit at all their operations, identify areas of improvement and present an implementation schedule.	Submission of audit executive summary	LS + 1 year
12.	Solid Waste Atateks will review its management of solid waste at all plants and present recommendations for improvements according to best practice and begin a control and monitoring program. (i) Report with recommendations and implementation schedule (ii) Implementation of recommendations (iii) Reporting solid waste management	Provide IFC with documentary evidence	(i) LS + 6 months (ii) LS + 1 year (iii) Annual Monitoring Report
13.	Hazardous material management and use Atateks will assess its hazardous material management and present recommendations for improvements according to best practice and begin a control and monitoring program (i) Report with recommendations and implementation schedule (ii) Implementation of recommendations (iii) Reporting hazardous material management	Provide IFC with documentary evidence	(i) LS + 6 months (ii) LS + 1 year (i) Annual Monitoring Report
14.	Fire Safety Atateks will assess their fire risk at all warehouses and report on recommendation for improvements according to best practice. Implement corrective actions in an appropriate timeframe.	Provide report to IFC for review	Annual Monitoring Report

COD – Condition of Disbursement; LS – Loan signature