

ENVIRONMENTAL AND SOCIAL ACTION PLAN FOR MODERN DAIRIES (#26947)

Action		Deliverables and Deadline	Responsible Person
Integrated Management System			
1.	Update and enhance the environmental, social, occupational health and safety management system(s) and documentation (manuals, SOPs etc.) Enhance the existing integrated management system that will incorporate the following elements: (i) organizing; (ii) training; (iii) documentation; (iv) community engagement, including clear procedure on disclosure and consultation with affected communities; (iv) monitoring; and (v) reporting. The management system will address identified environmental & health and safety impacts and risks of all existing and future operations. As part of the implementation Modern Dairy will update the existing management programs, procedures, monitoring and reporting protocols, and provide training to employees.	Documentary evidence to show that the company has allocated resources (staff/ consultant) and initiated this work (<i>prior to first disbursement</i>)	Mr. Nayar and Mr. Oberoi
2.	Develop and implement a corporate training program for all staff to raise awareness about the environmental, social, occupational health and safety management system	Updated management system documentation and internal audit report to show that an updated management system is in place (<i>within 6 months of first disbursement</i>) Documentary evidence such as training records (<i>within 6 months of first disbursement, subsequently through the annual submission of Annual Monitoring Report</i>)	Mr. Nayar and Mr. Oberoi
Labor and working conditions			
3.	Safety Audit and Management Conduct a Safety Audit and develop a documented work-plan based on the audit finding to improve the occupational health and working conditions in the Karnal plant for its labors and contract labor Child Labor Include specific clauses related to prevention of child labor, workers occupational health and safety in standard contracts for various services (<i>e.g., construction, fleet operations, security, casual labor, etc.</i>).	Provide IFC with safety audit report and safety management plan (<i>prior to first disbursement.</i>) Provide IFC with relevant contract copies (<i>prior to first disbursement</i>)	Mr. Nayar and Mr. Oberoi
Pollution prevention and Abatement			
4.	Workplace and Environmental Monitoring Develop and implement a documented comprehensive environmental monitoring program (air, water, solid waste emissions, noise, ambient environmental quality etc.) specifying the parameters and frequency of monitoring.	Provide IFC with environmental and workplace monitoring plan (<i>prior to first disbursement</i>), Subsequently, the monitoring data to be submitted to IFC (<i>annually as part of the Annual Monitoring Report</i>).	Mr. Nayar and Mr. Oberoi
14.	Waste Management Modern Dairy will update their policies and procedures to avoid the risks and impacts to health and agriculture. Modern Dairy will also establish Standard Operating Procedures (SOPs) for waste management (collection, handling, storage,	Submit to IFC the updated procedures and SOPs (<i>within 3 months of 1st disbursement</i>)	Mr. Nayar and Mr. Oberoi

	treatment, recycling and disposal) covering solid/hazardous wastes, wastewater and air emissions to ensure that there is no uncontrolled waste emissions outside company premises		
	Chemical Storage and Handling Develop and implement a training program for concerned staff about the best practices in chemicals storage, handling and management, and establish a documentation / reporting system	Documentary evidence such as training records and chemical handling documentation system (<i>within 6 months of first disbursement, subsequently through the annual submission of Annual Monitoring Report</i>)	Mr. Nayar and Mr. Oberoi
Community Health, Safety and Security			
	Risks and Emergency Management Plans Complete documented risk assessment study and develop a documented emergency management plan for the company staff as well as the neighborhood community to handle the emergencies such as fire, explosion etc.	Provide to IFC copies of the Risk Assessment Report and documented Emergency Management Plan (<i>within 3 months of first disbursement</i>)	Mr. Nayar and Mr. Oberoi
	Community Awareness Program Plan and implement community awareness programs related to community health (e.g. HIV AIDS), general hygiene etc. leveraging the network of milk collection centers at village levels	<i>Within one year of first disbursement</i>	Mr. Nayar and Mr. Oberoi

Date: 28 May 2008