

TIRYAKI (#28467) ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP) – NOVEMBER 2011 COMBINED IFI ESAP: DEG, Proparco, EBRD, FMO, IFC

Item	Action	Completion Indicator	Timetable
PS/PR1: Social and Environmental Assessment and Management Systems (* LS=Loan Signature)			
1.	Hire a Corporate Environment and Occupational Health, Safety Coordinator to coordinate and consolidate the implementation of the systems.	(i) Submit CV and contract of the manager to IFIs.	LS+3Months
2.	Implement Environmental, Health and Safety Management System in compliance with IFCs Performance Standard / EBRD Performance Requirement 1 - in line with ISO14001 and OHSAS 18001 - and integrate to Quality Management System and extend the management system to cover the Mersin plant.	(i) Submit evidence to IFIs that system implementation is completed by means of obtained certificates-	Gaziantep -LS+18 Months Mersin- 18 Months after operation starts
3.	Implement a third party audit for Environment and Occupational Health and Safety for Gaziantep facilities against the applicable local and national requirements and IFC's Environmental and Social Standards and relevant guidelines for both Gaziantep and newly constructed Mersin Plant	GAZIANTEP FACILITY (i) Submit contract with an independent audit company (ii) Submit audit results and action plan to IFIs (iii) Complete action plan items MERSIN FACILITY (iv) Submit contract with an independent audit company (v) Submit audit results and action plan to IFIs (vi) Complete action plan items	LS*+18 Months LS+20 Months LS+24 Months 18 Months after operation starts 20 Months after operations starts 24 Months after operation starts
PS/PR2: Labour and Working Conditions			
4.	-Review and revise, current HR Policy to ensure consistency in rights of blue and white collar workers and include a -section on workers' right to form/join professional trade unions and the	(i) Submit revised and submit HR Policy to IFIs for review	LS+3 Months

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	right for collective bargaining; -Introduce election for worker representatives among workers as an alternative mean to workers' organizations for its employees to express their concerns and grievances regarding working conditions and terms of employment -Place suggestion/complaint boxes to improve worker's grievance mechanism and assess regularly	(ii) Submit the election results and the photo of the boxes to IFIs. (iii) Submit assessment evidence	LS+6 Months LS+12 Months
5.	Supply Chain: As part of the ESMS, develop and implement procedures to ensure compliance of suppliers with IFC PS1, PS2 and PS6 and EBRD PR2 and PR6. These procedures will include: - Risk assessment of the supply chain: develop a risk assessment tool to screen potential high risk areas/region/countries for sourcing for the new commodities and countries - Develop and implement written procedures to identify harmful child labor, forced labor, and biodiversity issues related to farmer encroachment into protected areas or areas of high biodiversity. - Agreement with suppliers: include provisions into agreements with farmers to ensure no child labor, no forced labor, and no issues related to biodiversity or land disputes. - Monitoring of supply chain: develop a system to monitor impacts, risks and issues in the supply chain.	(i) Submit procedures to IFIs for review and comment. Provide copies of procedures. (ii) Submit clear and comprehensive implementation plan that includes; - responsibility & human resources, - budget, - timeline and roll out program and training (iii) Implementation of system as presented in the implementation plan.	LS+6 Months LS+ 12 Months LS+18 Months
6.	OHS Improvements; - Complete risk assessment for all production lines and workplaces and prepare a timely action plan to reduce the risks -Develop, and implement work permit system (hot works, electricity, work at height and confined space work) - Perform noise, dust, and light and measurements for all workplaces and outside area of the plants.	(i) Submit the risk assessments and action plan to IFIS (ii) Submit work permission documents for the related works (iii) Noise dust, temperature and light measurements are performed regularly and the results reported in AMR	LS+9 Months LS+18 Months LS+6 Months LS+12 Months

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	- Improve housekeeping and aspiration systems and keep the working areas and make electrical installations free of dust and covered, complete thermo-graphic analyses and resulted action plan. - Assign a safety officer for Mersin Plant construction site and Establish a Contractor Safety Management System	(iv) Submit report and action plan for thermo-graphic analyses (v) Submit risk assessments and written OHS manual and procedures	LS+3 Months
PS/PR3: Pollution Prevention and Abatement			
7.	Establish the wastewater and air emission monitoring program at all plants, including the Mersin Plant to verify compliance with WBG's guidelines and EU BAT, in addition to local requirements, where compliance with local / international standards is not achieved, develop an action plan to meet compliance.	(i) Submit monitoring analyses results to IFIs in the Annual Monitoring Report (AMR)	LS+9 Months LS +12 Months for development of action plan
8.	Prepare a R22 phase-out plan in line with local legislation, and purchase non-ozone depleting refrigeration agents in future purchasing	(ii) Submit the report to IFIS	LS+6Months
PS4 Community Health, Safety and Security			
9.	- Ensure that contracted logistic company trains drivers on OHS, checks drivers' health conditions, maintains trucks, follow speed limits -Minimize pedestrian interaction with the vehicles on site for both Gaziantep and Mersin facilities	(i) Drivers' training logs are maintained. (ii) Drivers' medical records are maintained. (iii) Trucks' technical maintenance records are available. (iv) Submit the related photos to IFIS	LS+6 Months LS + 9 Months
10.	Commission a study into the potential risks associated with climate change, water scarcity and adverse weather conditions in	Risk management tool and options	Commission study within 12 months, develop a risk management

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	the supply chain, logistics and processing.	analysis	procedure within 1-3 years
PS/PR5: Land acquisition, Involuntary Resettlement and Economic Displacement			
11.	Develop E&S risk management procedures – in line with IFC PS/EBRD PR - to be incorporated into new projects, land acquisition and investments (property and land bank acquisition and disposal), including appropriate stakeholder engagement for new developments.	Policy development and implementation	Prior to next major investment / project.