

Erbil Hotel Project #28566
FINAL ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP) - Dated October 23, 2009

	Action	Deliverable	Person Responsible	Deadline
1	(a) Develop environmental, health and safety procedures, facility guidelines and maintenance procedures and incorporate them into a comprehensive Social, Health, Safety and Environmental (SHSE) system in compliance to host country regulations and IFC's PS and Environment, Health and Safety (EHS) guidelines. (b) Enter into written agreement with Rotana to require compliance with IFC E&S requirements as well as host country regulations.	Final outline of SHSE manual including compliance with IFC PSs and EHS guidelines Written agreement signed by Malia and Rotana	Thomas Touma (Rotana) and Ibrahim Fayad	Within 6 months of date of hotel opening Prior to first disbursement.
2	Develop guidelines for emergency response plan including fire, hazard, assault, violence and personal injury and ensure the hotel operator incorporates the plan in its operation manual.	Emergency Response Plan	Ibrahim Fayad	Within 6 months of first disbursement
3	(c) Review current policies and procedures and amend the HR policy to conform fully to national labor law and regulations as well as IFC PS2 requirements including a formalized employee grievance mechanism, freedom of association and collective bargaining, child labor and forced labor. (d) Ensure that the hotel operator HR policy and procedures reflect all requirements of PS 2 and amend these if needed.	HR manual, policies and procedures Memorandum of Understanding to that effect with hotel operator	Mirna Brax Ibrahim Fayad/Mirna Brax	Within 6 months of first disbursement Condition of first disbursement
4	Monitor air emissions & wastewater discharges from all sources to ensure compliance with relevant IFC guidelines, and monitor energy and water use as part of overall energy/water savings program.	Annual monitoring reports	Ibrahim Fayad	Within 12 months of first disbursement
5	Commission a life and fire safety (LF&S) audit of the hotel design and construction compliance with IFC requirements, to be prepared by a suitably qualified professional acceptable to IFC.	Audit report certifying that design and construction meets the requirements of national laws and IFC's L&FS guidelines.	Audit commissioned (Ibrahim Fayad)	Within 3 months of commitment
6	(a) Ensure that hotel operator develops HACCP process for food handling (b) Operating Manual that addresses employee occupational health and Safety (OHS) procedures and safeguards.	Hotel Operator SOP Hotel Operator SOP	Thomas Touma Thomas Touma	Within 12 months of first disbursement Within 6 months of first disbursement
7	Ensure that third party security forces adhere to PS 4, and establish a community grievance mechanism.	Policy and procedures incorporated into SHSE	Mirna Brax Fouad Chehab	Within 6 months of first disbursement