

DRAFT Environmental and Social Action Plan

Mriya Project, Ukraine

IFC Reference: 28632

Date: February 23, 2010

Item	Action	Deliverable	Due Date
1	To ensure sustainable operations in future potential expansion areas suitable for Mriya's grain production:		
1.1	Amend and document the existing internal E&S screening procedure in compliance with IFC Guidelines, PS1 and PS6.	Documented procedure	August 2010
1.2	Develop a formal documented Pesticide and Fertilizer Application Management Plan, which will cover the areas of pesticide and fertilizer selection and handling, application and storage, staff training, safety requirements, and disposal, consistent with national laws and regulations and IFC's guidelines	Pesticide and Fertilizer plans prepared and documented	August 2010
1.3	Develop a program for reduction of GHG emissions by improving energy and water use and report annually on the progress to IFC	Program for reduction of GHG emissions	January 2011 and annually in AMR
2	Ensure adequate in-house expertise for development, implementation and auditing of EHS management system consistent with international standards ISO 14001 and OHSAS 18001:		
2.1	Appoint a suitable qualified EHS manager at the corporate level	Document to IFC's satisfaction	June 2010
2.2	Train two management representatives as follows: EMS Lead Auditor Training Course (5 days); OHS Lead Auditor course (5 days), both to be trained at both courses	Certificates	September 2010
3	Strengthen communication and relationship between Mriya and its employees: Develop and implement a formal internal grievance process consistent with PS 2.	Document to IFC's satisfaction	August 2010
4	Ensure effective EHS management and improve health and safety conditions of Mriya's affiliated sugar plants by undertaking the following high-priority actions:		
4.1	Improve sanitary and hygiene conditions of workers' locker rooms consistent with good international practices	Document to IFC's satisfaction	May 2010

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4.2	Identify need for and provide appropriate personal protective equipment (safety shoes, helmets, protective clothes and gloves, etc.) depending on specific OHS risks and its proper handling (storage, cleaning, etc.)	Document to IFC's satisfaction	May 2010
4.3	Monitor liquid effluent quality of sugar plants while facilities are operated; prepare action plans if the effluents exceed guideline limits and implement corrective actions, if needed, to meet the World Bank/ IFC guidelines for liquid effluents	Document monitoring to IFC's satisfaction	September 2009 results used to prepare a corrective action plan by July 2010 if deficiencies are found and annual reporting in AMR
4.4	Arrange independent audits of the sugar plants to identify potential cost beneficiary measures to improve efficiency of energy and water use; develop and implement corrective action plans based on audit recommendations	Audit report	October 2010 and annual reporting in AMR
4.5	Repair/revamp production buildings (ceilings, windows, walls, floors, stairs, electrical installations, etc.) to safe conditions in buildings to remain in operation	Plan for upgrade/phase out	December 2010
5	Ensure effective EHS management of all facilities under Mriya's operation and control (incl. storage facilities, farms, and affiliated sugar plants, etc.):		
5.1	Arrange regular internal EHS audits of compliance with international standards and IFC's guidelines; develop and implement corrective action plans where deficits are revealed by the audits	Audit program	May 2011 and annual reporting in AMR
5.2	Develop a Waste Management System that will include (but not be limited) inventory of waste sources and types; collection methods; the most appropriate disposal ways including disposal of empty pesticide containers; management responsibilities and proper staff training	Waste Management Program	July 2011; and annual reporting in AMR
6	Ensure continuous stakeholder engagement by:		
6.1	Disclose a summary of the IFC findings (the ESRS in full or part) on environmental and social aspects of the project locally in a culturally appropriate (local language) manner	Document to IFC's satisfaction	Before IFC Board approval
6.2	Establish a formal grievance mechanism to receive and respond to potential community concerns about Mriya's environmental, health, safety and social performance	Documented procedure	September 2010