

Environment & Social Action Plan Atul Expansion

Issue and Task (include a short but specific description of the requirement to be met by the project proponent)	Indicator of Completion (Describe objective evidence to be supplied to IFC)	Required Completion Date (Calendar date, condition of disbursement, etc.)
PERFORMANCE STANDARD 1 – SOCIAL AND ENVIRONMENTAL ASSESSMENT AND MANAGEMENT SYSTEMS		
<p>1. Environmental and social assessment Issue: There is a need for improved information on environmental and social impacts relating to the expansion in relation to existing industrial activity in the area.</p> <p>Task: Conduct cumulative impact assessments for the Atul's main site and Ankleshwar site .</p>	<ul style="list-style-type: none"> Cumulative impact assessment reports for Atul's main site and Ankleshwar site. 	<ul style="list-style-type: none"> By last disbursement or December 2010, whichever is earlier
<p>2. EHS management Issue: Need to improve OHS refresher training.</p> <p>Task: SHE department to implement an annual refresher training program to ensure all employees receive annual refresher training specific to their positions.</p>	<ul style="list-style-type: none"> OHS refresher training plan and implementation records. 	<ul style="list-style-type: none"> On-going First round done by June 2011.
<p>3. Monitoring of drinking water to communities Issue: Atul provide piped water to local communities</p> <p>Task: Periodic reports should be developed and kept for easy access at any time and disseminated to communities in an appropriate format</p>	<ul style="list-style-type: none"> Routine Water test data to be summarized and submitted annually to IFC 	<ul style="list-style-type: none"> On-going
<p>4. Formulation of grievance mechanism Issue: currently there is an informal grievance mechanism with information difficult to access Task: Formalize Atul's grievance mechanism by establishing a database that can be accessed easily when needed. The grievance mechanism should at least consist of nature of the grievance, date grievance received, date closed out, corrective actions taken and status.</p>	<ul style="list-style-type: none"> Grievance records to be consolidated and submitted annually to IFC 	<ul style="list-style-type: none"> On-going
PERFORMANCE STANDARD 2 – LABOUR AND WORKING CONDITIONS		
<p>5. Occupational health and safety (OHS) Issue: personal protection equipment (PPE) management could be improved.</p>		

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<p>Task: Review PPE inventory, check PPE effectiveness, and improve PPE procedures for some critical processes, such as phosgene and chlorine manufacturing.</p> <p>Issue: OHS performance of contractors</p> <p>Task: Improve OHS management for contractors</p>	<ul style="list-style-type: none"> • Submit the PPE management progress report. • Submit the contractor OHS management plan. 	<ul style="list-style-type: none"> • December 2010. • December 2010.
<p align="center">PERFORMANCE STANDARD 3 – POLLUTION PREVENTION AND ABATEMENT</p>		
<p>6. Wastewater discharge Issue: Large amounts of wastewater are discharged with potential impacts on local fishing grounds.</p> <p>Task 1: Prepare a detailed water saving and pollution reduction plan.</p> <p>Task 2: Monitor toxicity parameters in the effluent according to the WBG EHS guideline to ensure minimum impacts to local fishing grounds.</p> <p>Task 3: Conduct a wastewater effluent characteristics study to find ways to reduce contaminant loading in the effluent.</p> <p>Task 4: Reduce the source pollutant loads and increase treatment efficiency to ensure the wastewater effluent meets applicable WBG EHS guideline limits</p>	<ul style="list-style-type: none"> • Water saving and pollution reduction plan • Toxicity monitoring reports • Effluent characteristics data • Effluent monitoring reports 	<ul style="list-style-type: none"> • December 2010 • September 2010 • September 2010 • December 2011
<p>7. Air emission Issue: Air emissions from incineration, though meets local regulatory norms, do not currently meet all IFC requirements.</p> <p>Task: Increase the scrubber efficiency to reduce particulate matter and formaldehyde emissions from the incinerator to meet World Bank Group (WBG) EHS guideline limits</p>	<ul style="list-style-type: none"> • Emission monitoring report. 	<ul style="list-style-type: none"> • March 2011
<p>8. Equipment and pipeline safety Issue: Corrosion of older equipment and pipelines</p> <p>Task: Apply anti-corrosion coating or paint to older production units, starting</p>	<ul style="list-style-type: none"> • Photos of coating/paints. 	<ul style="list-style-type: none"> • Phosgene unit:

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with the phosgene and chlorine units		December 2010 <ul style="list-style-type: none"> • Chlorine unit: June 2011 • All other units: December 2011
PERFORMANCE STANDARD 4 – COMMUNITY HEALTH, SAFETY AND SECURITY		
<p>9. Transportation safety Issue: Hazardous material transported on public highways.</p> <p>Task 1: Coordinate with local responsible agencies to expand the existing emergency response (ER) program for chlorine transportation to include all hazardous materials.</p> <p>Task 2: Conduct off-site ER drills for hazardous material transportation with responsible government agencies, local hospitals, and community representatives.</p> <p>Task 3: Complete a recognized defensive driver training course for all Atul drivers. All the drivers should have annual refresher safe driver training.</p> <p>Task 4: Contract a transportation safety expert to audit the existing vehicle providers and transportation contractors and only work with contractors that can demonstrate that their drivers have completed a recognized defensive driver training course.</p>	<ul style="list-style-type: none"> • Road transportation ER plan. • Photos, logs, etc. for the off-site ER drills for transportation • Record of the training courses • Audit report 	<ul style="list-style-type: none"> • September 2010 or last disbursement whichever is earlier. • Once/year • September 2010 or last disbursement whichever is earlier. • December 2010