

Environmental and Social Action Plan

Globino Project, Ukraine (# 29195)

Date: April 8, 2010

Issue and reference to PS		Actions	Deliverable	Due Date
PS1: Social and Environmental Assessment and Management System				
Improvement of the EHS management system consistent with international standards ISO 14001 and OHSAS 18001 and adequate in-house expertise for its development, implementation, reporting and auditing	1	Appoint a suitable qualified EHS manager at the corporate level	Documents to IFC's satisfaction (curriculum vitae/resume, order of appointment)	May 2010
	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 of qualification and presentation of the work plan	July 2010
	3	Develop a Program/Plan for design and implementation of the Corporate EHS Management System appropriate to the nature and scale of the rapid growing of operations	Management program for the EHS management system development and implementation	November 2010
	4	Implement the EHS management system in accordance with time frame specified in the Program	Report on progress in Annual Monitoring Report (AMR)	As specified in the Program (see Action Item 3)
Environmental and Social Impact Assessment (ESIA) Studies of new and upgraded facilities	5	Assess applicability of the Ukrainian's environmental legal and regulatory requirements as it relates to what facilities being reconstructed (pig farms, slaughterhouse and dairy mill) are subject for ESIA studies	Documents approved by the Company's legal adviser and/or outside consultant to the satisfaction of IFC	Condition of first disbursement
	6	Conduct ESIA studies required for new/ reconstructed facilities, in accordance with the Ukrainian's environmental legal and regulatory requirements.	Copies of ESIA Studies, with ESIA summaries in English; Conclusions of the State Environmental Expert Review Committee; Terms and Conditions of the Environmental Licenses	Prior to the commissioning of facilities

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		For facilities that do not require ESIAs, develop E&S measures to mitigate potential negative impacts on environment and affected communities Completion of an overall Environmental and Social Action Plan for the expansion plan, taken into account the following: 1) ESIA's Environmental Management Plan (EMP) of all facilities; 2) Terms and Conditions, as spelled out in the environmental license.	Written documents with E&S mitigation measures Submission of Globino's corporate environmental and social Action Plan	
	7	Implement corrective actions identified in the ESIAs or in the E&S mitigation measures documents	Report on progress in AMR	Annually
PS: 2 Labour and Working Conditions				
Enhancement of the corporate HR Policy and grievance mechanism	8	Review and upgrade HR Policy on the management commitments to employees' rights for labor protection, including right /freedom for professional associations, trade unions; non-discrimination principles based on gender, race, age, ethnic and religious association, or nationality in employment; HR organizational structure and responsibilities; corporate approaches to workforce hiring; reduction of staff turnover; professional training; internal communications	Revised HR Policy	March 2011
	9	Develop corporate grievance process consistent with IFC's Performance Standard 2 to be implemented at all local facilities	Corporate procedure. Submission of its implementation plan	February 2011
PS3: Pollution Prevention and Abatement				
	10	Ensure adequate treatment of wastewaters from	Documents to IFC's satisfaction	

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Wastewater management improvement		the slaughterhouse and the dairy after completion of its reconstruction to meet Ukrainian and the World Bank/ IFC guidelines for liquid effluents	to confirm that WTPs are sufficient to provide water quality acceptable for discharge to land and surface water including relevant approvals/ conclusions of local authorities and photos to confirm installation of WTPs prior operation of reconstructed facilities	December 2010 for the slaughterhouse; June 2010 for the dairy mill
	11	Identify adequate measures to prevent potential leakage or run off from pig farms' sedimentation ponds and manure disposal areas	Documents to IFC's satisfaction including report on facilities' conditions; list of corrective actions and confirmation of its implementation	November 2010; and annually in AMR
	12	Monitor, on a monthly basis, liquid effluent quality after treatment at the WTPs for the meat processing plant and the dairy farm and implement corrective actions, if needed, to meet the World Bank/ IFC guidelines for liquid effluents	Report on progress in AMR	Annually in AMR
Development of the comprehensive waste management system for pig farming, meat processing and dairy operations	13	Develop Waste Management Plans for pig farming, meat processing and dairy operations that, except of inventory of waste sources and types, will include proper methods for collection and temporary on-site storage of biological wastes prior to appropriate disposal; management responsibilities and proper staff training programs	Waste management plans for pig farming, meat processing and dairy operations	July 2011; Report on progress in AMR
	14	Minimize or avoid use of asbestos containing materials (ACMs) in new construction and renovation	Corporate resolution to avoid or minimize using ACMs and ban using of PCBs in new construction and renovation	September 2010
	15	Inventory polychlorinated biphenyls (PCBs) and develop feasible actions for stepwise replacement of equipment containing PCBs	Inventory report and plan for replacement	October 2011

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Hazardous materials handling	16	Develop a formal documented Pesticide Management Plan which will cover the areas of pesticide selection and handling, application and storage, staff training, safety requirements, and disposal	Pesticide Management Plan	November 2010
	17	Upgrade existing ammonia refrigeration units of the dairy mill to comply with internationally recognized norms and standards	Plan for upgrading of dairy's ammonia refrigeration units	July 2010
Reduction of carbon footprint	18	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; Report on progress in AMR	October 2011; Annually in AMR
PS4: Community Health, Safety and Security				
Reduce potential risks to community health and safety	19	Conduct studies to confirm that drug and pesticide residues in milk and pig tissue meet maximum residue limits (MRLs) recommended by the World Health Organization (WHO) and Food and Agriculture Organization; and will undertake corrective actions, if needed to comply with MRLs	Report on compliance with MRLs including correction action plan ; Reporting on the plan implementation	April 2011; Annually in AMR
	20	Develop a Veterinary Health Plan that will cover disease prevention strategies, parasite controls, antibiotics application, etc. based on the FAO/WHO recommendations and implement corrective actions, if needed, including staff training	Veterinary Health Plan; reporting on the plan implementation	September 2011; Annually in AMR
PS1: Local disclosure of E&S information about the project	21	Disclose information about environmental and social aspects of upgrades and new assets locally in an appropriate manner	Document to IFC's satisfaction	Before IFC Board approval