

## Environment & Social Action Plan Galaxy Chemicals

<b>Issue and Task</b> (include a short but specific description of the requirement to be met by the project proponent)	<b>Indicator of Completion</b> (Describe objective evidence to be supplied to IFC)	<b>Required Completion Date</b> (Calendar date, condition of disbursement, etc.)
<b>PERFORMANCE STANDARD 1 – SOCIAL AND ENVIRONMENTAL ASSESSMENT AND MANAGEMENT SYSTEMS</b>		
<p><b>1. Environmental and Social Impact Assessment (ESIA)</b>            Issue: ESIA does not cover the new wastewater treatment approach.</p> <p>Task: Revise the ESIA to evaluate the effectiveness of membrane bio-reactor (MBR) for further treatment of the wastewater and the possibility of wastewater reuse.</p>	<ul style="list-style-type: none"> <li>• Revised ESIA with assessment of wastewater treatment with MBR unit and analysis of the possibility for wastewater recycle.</li> </ul>	<ul style="list-style-type: none"> <li>• Prior to the first disbursement</li> </ul>
<p><b>2. Environment, Health, and Safety (EHS) Management</b>            Issue: No EHS management system at current early project stage.</p> <p>Task: Set up an effective EHS management system in accordance with the project construction and operation.</p>	<ul style="list-style-type: none"> <li>• Hire environment, health, and safety (EHS) manager.</li> <li>• Draft all EHS programs and procedures for its operations.</li> <li>• Obtain ISO 14000 certificate or demonstrate the effectiveness of the EHS management system</li> </ul>	<ul style="list-style-type: none"> <li>• By the end of 2010</li> <li>• Prior to the trial production</li> <li>• One year after the trial production starts.</li> </ul>
<p><b>3. Community Engagement</b>            Issue: There is no community engagement plan at the early stage of the project.</p> <p>Task: Hold a public consultation, identify the vulnerable community in the project area, and develop a feasible community development plan.</p>	<ul style="list-style-type: none"> <li>• Identify the vulnerable community in the project area and develop a feasible community development plan.</li> <li>• Hold a public consultation with local community.</li> </ul>	<ul style="list-style-type: none"> <li>• By the end of 2010</li> <li>• Prior to the trial production</li> </ul>
<b>PERFORMANCE STANDARD 2 – LABOR AND WORKING CONDITIONS</b>		

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<b>4. Human Resource (HR) Policy</b> Issue: There is no HR policy and procedures at the early stage of the project  Task: Prepare a qualified human resources (HR) policy and procedures for the Egypt operation	<ul style="list-style-type: none"> <li>• An HR policy and procedures that meet requirements of Egypt regulations and IFC Performance Standards</li> </ul>	<ul style="list-style-type: none"> <li>• Three months prior to the trial production</li> </ul>
<b>5. Occupational Health and Safety (OHS)</b> Issue: There are no OHS procedures at the early stage of the project  Task: Prepare OHS procedures for each operation position and train all the employees for OHS procedures based on their positions.	<ul style="list-style-type: none"> <li>• Prepare OHS procedures for each operation position.</li> <li>• All the new employees have the OHS training</li> </ul>	<ul style="list-style-type: none"> <li>• Three months prior to the trial production</li> <li>• Prior to the trial production</li> </ul>
<b>PERFORMANCE STANDARD 3 – POLLUTION PREVENTION AND ABATEMENT</b>		
<b>6. Wastewater Treatment</b> Issue: Effluent could not meet IFC EHS guideline limits  Task: Adopt membrane bio-reactor technology (MBR) to further treat wastewater and ensure the effluent meet World Bank Group EHS guideline limits	<ul style="list-style-type: none"> <li>• Construct and test MBR</li> </ul>	<ul style="list-style-type: none"> <li>• Prior to the trial production</li> </ul>
<b>7. E&amp;S Performance of Key Raw Material Suppliers</b> Issue: No information about E&S performance of key suppliers  Task: Audit E&S performance of key suppliers.	<ul style="list-style-type: none"> <li>• Audit E&amp;S performance of key supplier once every three years</li> </ul>	<ul style="list-style-type: none"> <li>• During project execution</li> </ul>
<b>8. Process Safety</b> Issue: No quantitative information for process safety control  Task: Contract external experts to conduct hazard operability (HAZOP) study	<ul style="list-style-type: none"> <li>• HAZOP documents ready for review</li> </ul>	<ul style="list-style-type: none"> <li>• Prior to trial production</li> </ul>
<b>PERFORMANCE STANDARD 4 – COMMUNITY HEALTH, SAFETY AND SECURITY</b>		

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<p><b>9. Community Safety</b>            Issues: Community safety for road transportation and emergency response</p> <p>Task: Ensure that the community is informed for project danger and react promptly during emergency</p>	<ul style="list-style-type: none"> <li>• Coordinate with neighboring companies and involve the local hospital, fire brigade, and representatives from nearby community in the emergency response drills.</li> <li>• Only contract with transportation companies that have defensive driving programs, acceptable safe driving records, and sufficient emergency response methods</li> <li>• Quarterly accident report from the hazardous material transportation companies.</li> </ul>	<ul style="list-style-type: none"> <li>• During project execution.</li> <li>• During project execution.</li> <li>• During project execution.</li> </ul>
<b>PERFORMANCE STANDARD 8 – CULTURE HERITAGE</b>		
<p><b>10. Potential Culture Heritage Site</b>            Issues: Though the ESIA confirms that there is no culture heritage site at or near the project location, there is still chance to discover a culture heritage site in Egypt.</p> <p>Task: Develop a chance finding procedure to project construction and operation.</p>	<ul style="list-style-type: none"> <li>• Prepare a chance finding procedure and implement it during construction and operation.</li> </ul>	<ul style="list-style-type: none"> <li>• Prior to the first disbursement.</li> </ul>