

March 30, 2011

Pakistan: Zorlu Pakistan (IFC Project #29251): Environmental and Social Action Plan (ESAP)

No.	Action	To be verified by:	Implementation Schedule
1 (PS1)	Update the Environmental Management Plan (Chapter 9 of the April 2010 EIA) based on the final arrangement with phase II construction contractors and O&M operator.	Updated Environmental Management Plan.	For construction phase: Before start of phase II construction. For operational phase: Within 3 months from commissioning of phase II.
2 (PS2)	Develop HR policy and procedures for Zorlu Pakistan in line with IFC Performance Standard 2 (Labor and Working Conditions). They should address employees workers rights related to wages and benefits, working conditions, terms of employment, the principle of equal opportunity, fair treatment and non-discrimination, grievance mechanism.	Copy of the HR policy and procedures	Prior to first disbursement
3 (PS3)	Implement environmental mitigation measures and monitoring programs described in the Environmental Management Plan (Chapter 9 of the April 2010 EIA) or its updated versions.	Implementation status to be reported by Annual Monitoring Report to be submitted to IFC	Annually
4 (PS4)	Implement mitigation measures to reduce negative impacts and risks to the communities by the construction or operation of the Project as summarized in the IFC ESRS	Implementation status to be reported by Annual Monitoring Report to be submitted to IFC	Annually
5 (PS6)	Develop and implement a detailed bird monitoring program in consultation with the environmental organization engaged with protection of Keenjhar Lake.	Copy of the detailed monitoring program, and its implementation reports	Monitoring program: Prior to first disbursement. Implementation reports: Annually for two years after phase II commissioning.
6 (PS6)	Evaluate the outcome of the detailed monitoring program after two years from the commercial operation of phase II by engaging independent ornithologists / biologists to determine whether additional follow-up mitigation measure would be needed or not.	Copy of the evaluation report	Within 3 years of phase II commissioning.
7 (PS6)	If the evaluation by independent ornithologists / biologists indicates significant bird strikes by the Project, implement follow-up mitigation measures recommended by the independent ornithologists / biologists to address the negative impacts including if so required a shutdown system protocol and enhanced collision monitoring program.	Description of the follow-up mitigation measures if recommended by the independent ornithologists / biologists.	Within 3 years of phase II commissioning.
8 (PS1)	Develop a comprehensive community development plan ("CCDP") as described in the April 2010 EIA to address the needs and expectations of the Project affected communities.	Copy of the CCDP	Prior to first disbursement