

SSL II # 29692 Environmental Social Action Plan (ESAP)

May 2010

Ref.	Proposed Actions	Timetable Implementation
1	Water Permit Related Matters Implement program to meet remaining obligations under the terms of the March 2010 Water Permit. These are: 1. Separation of waste water streams 2. Continuous monitoring of waste water quality 3. Neutralization of overflow water from the White Sea pond 4. Sanitary waste water treatment facility 5. Run-off water treatment (with oil separators and sand filters)	Completion of works: 1. December 2010. 2. December 2012 3. August 2012 4. Priority measure – August 2011 5. August 2012
2	Occupational Health & Safety Management Programme Prepare and implement Health & Safety Management Plan in accordance with OHSAS 18000, with a view to eventual certification.	Obtain OHSAS 18001 certification of the OHS management system by March 2011.
3	Air Monitoring Extend existing air emissions monitoring program to include a wider range of environmental parameters (twice yearly). SSL will establish, in coordination with Tuzla Canton, SSL's contribution to the overall pollution, and accordingly to implement corrective actions. Also SSL should extend the existing air emissions monitoring program beyond just PM to include a wider range of environmental parameters such as SO ₂ , NO ₂ , CO, O ₃ .	First report including extended monitoring parameters to be provided to IFC in March 2011.
4	Air Emissions Control SSL shall repair the electrostatic precipitator serving boiler stack # 7 in order to reduce point source particulate emissions to IFC guideline levels.	June 2011.
5	Fly Ash Disposal – Black Sea Examine options to utilize fly ash in neighboring cement factory as an alternative to disposal in the "black sea"	December 2010.

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6	Process Waste Management – Tailings Ponds 1. Prepare long-term operational management and closure and rehabilitation plan for the “White Sea” 2. Assess the options for installing of Monitoring wells required at the tailing ponds. 3. Monitoring wells installed	1. In 2011 white sea settling ponds 3 and 4 are scheduled to be built up / volume enlarged capacity while pond 1 should be emptied during 2011 and pond 2 during 2012. Also, there are plans to check if it is possible to use white and black seas sludge for roads and mine area recultivations. A dam stability assessment has been undertaken. The Study is done by Tuzla Geological Faculty providing evidence that the integrity and stability of the dam is not jeopardized – a further built-up of 17 meter on top of the existing dam is possible enabling disposal for the next 120 years. 2. September 2010. 3. During 2011 and confirmed in AMR report.
7	Community Engagement Program Initiate adequate staffing and training of staff for proper and regular interaction with all stakeholders.	1. Staff to be designated by September 2010.
8	Prepare Retrenchment Policy compliant with IFC PS2 requirements and national labor law.	To be submitted to IFC for verification by June 15th 2010
9	Prepare Retrenchment Plans for any retrenchment of 10 or more persons in any given quarter.	Submit such Plans to IFC for review.
10	If retrenchment-related concerns are raised by large number of employees or labour unions or as a result of observations made during IFC supervision visits SSL will, after consultation with IFC, commission an independent labour audit. Implement key recommendations (if any), in consultation with IFC.	Positive covenant. Terms of Reference and consultant selection to be agreed between IFC and SSL if the need for an audit is identified. Draft and final audits to be submitted to IFC for review.