

ENVIRONMENTAL AND SOCIAL ACTION PLAN FOR DUNAR FOODS RICE (INDIA) - PROJECT # 30252

No.	Description	Due Date	Deliverable	Responsibility
1.	Implement certifiable environmental management systems (EMS) as per the ISO 14001 standard, with explicit reference to IFC Performance Standards and Guidelines as applicable requirements	December 2012	EMS manuals, internal / external audit reports, ISO 14001 certificate	Management Representative
2.	Establish Food Safety Management System according to ISO 22000:2005 including third-party certification for Amritsar plant.	December 2012	Management system manual, internal / external audit report, ISO 22000 certificate	Director Operation Amritsar
3.	Implement Standing Orders for its workforce Revise the HR manual for both the facilities by incorporating relevant PS2 requirements	Prior to first disbursement but not later than 30 September 2011	Revised HR manual, Copy of Standing Orders approved by labor department.	HR Manager
4.	Include specific clauses related to harmful child labor, workers occupational health and safety (OHS) in standard contracts (<i>e.g., construction, transportation, packaging</i>).	Prior to first disbursement	Copies of revised contracts with clauses related to harmful child labor, OHS requirements	Director Operation (Amritsar and Karnal)
5.	Develop and implement a comprehensive environmental monitoring program (air, water, solid waste emissions, noise, ambient environmental quality etc.) specifying the parameters and frequency of monitoring.	Prior to first disbursement	Updated monitoring program specifying parameters to be monitored, frequency, location, responsibility, sampling analysis procedures and report formats	Director Operation (Amritsar and Karnal)
6.	Based on the monitoring reports for air emissions and wastewater parameters upgrade the pollution mitigation devices, as needed, to ensure compliance with both regulatory and IFC limits.	As soon as a non-compliance is noticed, agree with IFC about an action plan for upgrade of pollution mitigation devices, as needed. Implement the Action Plan as per agreed timeframe	Action Plan, Implement the action plan.	Director Operation (Amritsar and Karnal)
7.	Develop and implement a procedure for its armed security guards in accordance IFC requirements with regard to use of force, and train its security guards accordingly.	Prior to first disbursement	Procedure on use of force for security guards, evidence of training of guards	Director Operation (Amritsar and Karnal)
8.	Develop and implement (i) a grievance mechanism for construction and operational phases as well as (ii) plans for community communication and engagement during operation phase	Documented procedure, photos, summary report of various community engagement and disclosure initiatives	Condition of Disbursement	Director Operations

As on 1 April 2011