

TAMEK (#30294) ENVIRONMENTAL AND SOCIAL ACTION PLAN – JANUARY 2011

Unless a specific plant name is not mentioned, all three plants are responsible for the action item

Item	Action	Completion Indicator	Timetable
	PS1: Social and Environmental Assessment and Management Systems		(LS=Loan Signature)
1.	Obtain Certification for ISO22000/HACCP for all plants. Address any corrective actions that arise from the certification process.	(i) Submit adequate evidence to IFC that system implementation is completed. (ii) Provide copies of accredited Certification Body certificates. (iii) Provide adequate evidence to IFC that all corrective actions are completed.	LS (Loan Signature)+12 Months
2.	Hire/Assign a corporate Environment and Occupational Health, Safety Manager/Coordinator to coordinate and consolidate the implementation of the systems.	(i) Submit CV and contract of the manager to IFC.	LS+ 3 Months
3.	Implement Environmental Management System in line with ISO14001 and integrate to Quality Management System	(i) Submit adequate evidence to IFC that system implementation is completed. (ii) Provide copies of accredited Certification Body certificates. (iii) Provide adequate evidence to IFC that all corrective actions are completed.	LS+18 Months LS+24 Months LS+30 Months
4.	Implement Occupational Health and Safety Management System in line with OHSAS18001 and integrate to Quality management system.	(i) Submit adequate evidence to IFC that system implementation is completed. (ii) Provide copies of accredited Certification Body certificates. (iii) Provide adequate evidence to IFC that all corrective actions are completed.	LS+15 Months LS+21 Months LS+27 Months

TAMEK (#30294) ENVIRONMENTAL AND SOCIAL ACTION PLAN – JANUARY 2011

Unless a specific plant name is not mentioned, all three plants are responsible for the action item

Item	Action	Completion Indicator	Timetable
PS2: Labour and Working Conditions			
5.	Enlarge capacity of the canteen and social areas to meet the seasonal workers additional needs in Karacabey Plant	(i) Submit photos of re-organised canteen and social areas	KARACABEY: LS+9 Months
6.	Supply Chain: As part of the ESMS, develop and implement procedures to ensure compliance of suppliers with IFC PS1, PS2 and PS6. These procedures will include: - Mapping the supply chain: develop and implement written procedures for the buying centers, including recording, and tracking of all individual farmers, their produce, area of sourcing and quantities. - Risk assessment of the supply chain: develop a risk assessment tool to screen potential high risk areas/region/countries for sourcing; - Develop and implement written procedures to identify harmful child labor, forced labor, misuse of pesticides and fertilizers, land disputes and biodiversity issues related to farmer encroachment into protected areas or areas of high biodiversity. - Develop a system to monitor the working conditions of migrant workers for Tamek's contracted farms. Ensure that the transportation, sheltering, eating and drinking facilities and working conditions of this immigrant workers are in line with local internationally recognized standards - Agreement with suppliers: include provisions into agreements with farmers to ensure no child labor, no forced labor, and no issues related to biodiversity or land disputes. - Monitoring and reporting of supply chain: develop a system to monitor impacts, risks and issues in the supply chain.	(i) Submit procedures to IFC for review and comment. Provide copies of procedures. (ii) Submit clear and comprehensive implementation plan that includes; - responsibility & human resources, - budget, - timeline and roll out program and training (iii) Implementation of system as presented in the implementation plan.	LS+12 Months LS+ 21 Months LS+36 Months
7.	- Modify services and construction contracts to mandate full implementation of an occupational health and safety and environmental management system for contracted services; and full compliance with Tamek's Human Resources Policy and Practices for Employees. - Perform asbestos inventory before demolishing any buildings, seriously monitor potential asbestos handling and provide safe	(i) Provide IFC with evidence that services and construction contracts have been modified to mandate occupational safety and health programs and flow down of Tamek's Human Resources policies and OHS system to contractor personnel (ii) Submit asbestos inventory report and document handling procedures	LS+6 Months BEFORE A DEMOLITION STARTS

TAMEK (#30294) ENVIRONMENTAL AND SOCIAL ACTION PLAN – JANUARY 2011

Unless a specific plant name is not mentioned, all three plants are responsible for the action item

Item	Action	Completion Indicator	Timetable
	disposal (e.g. replacement of roof material)		
8.	OHS Improvements; - Complete risk assessment for all production lines and workplaces and prepare a timely action plan to reduce the risks (slip and trip risks; work at height hazards; dangerous stairs, ladders and platforms; lifting and repetitive work; electrical risks; noise and vibrations; chemicals and detergents; and rotating and moving machinery parts) -Improve machine guarding, develop (confined spaces, standalone working ,electrical work), and implement work permit system, ensure implementation of LOTO (lock out tag out) system for maintenance and cleaning jobs, install padlocks for necessary equipments - Separate pedestrian and vehicle traffic on plant sites - Perform noise and light measurements for all workplaces and outside area of the plants and ensure ear plugs are used in required workplaces - Ensure that PPE, emergency body and eye showers are readily available at the usage and storage areas of HNO₃ and NaOH and train employees on safe practices of chemicals handling. - Periodically maintain ammonia tanks and compressors, provide detection system and necessary PPE (special clothes, carbon filtered masks, eye and body showers etc).	(i) Submit the risk assessments and action plan to IFC (ii) Complete the actions (iii) Submit the related photos and documents to IFC (iv) Submit the related photos to IFC (v) Noise and light measurements are performed regularly and the results reported in AMR. (vi) Submit the related photos to IFC (vii) Submit maintenance records to IFC	- LS+8 Months - LS+12 Months - LS+12 Months - LS+3 Months - LS+9 Months - LS+9 Months - LS+9Months
9.	Tamek will install fire detection and alarm system on production buildings and warehouses. Emergency lightening and exit signs will be improved. Daily visual inspections conducted. This information is reported in AMR to IFC.	(i) Submit evidence to IFC	LS+12 Months

TAMEK (#30294) ENVIRONMENTAL AND SOCIAL ACTION PLAN – JANUARY 2011

Unless a specific plant name is not mentioned, all three plants are responsible for the action item

Item	Action	Completion Indicator	Timetable
	All new buildings will be designed, constructed, and operated in full compliance with local building codes, local fire department regulations, local legal/insurance requirements, and in accordance with an internationally accepted life and fire safety (L&FS) standard. An independent fire consultant will perform an audit to ensure effectiveness of the system for new buildings. Tamek will have regular L&FS training and drills according to the plan, which would involve adjacent companies and neighbouring communities.	(ii) Submit fire systems design and plan for the new buildings (iii) Submit audit results to IFC (iv) Emergency preparedness plan and records of regular trainings and drills are maintained.	BEFORE THE CONSTRUCTION OF NEW BUILDINGS STARTS AFTER THE CONSTRUCTION IS COMPLETED LS+12 Months
PS3: Pollution Prevention and Abatement			
10.	Tamek will undertake a Cleaner Production (CP) Audit to identify opportunities to save energy and water and decrease pollutant load in its effluent.	(i) Submit CP Audit Action plan to IFC (ii) Provide evidence to IFC that the program is implemented.	Starting before 1ST Disbursement - ongoing LS+18 Months
11.	Tamek will design and construct a waste water treatment plant for Karacabey Plant in line with host country and applicable WBG Guidelines requirements Tamek will extend wastewater monitoring program to cover all parameters within WBG guidelines	(i) Submit Design Documents to IFC (ii) Submit completion certificates to IFC (iii) Submit data in AMR	LS+3 Months LS+12 Months LS+12 Months
12.	Tamek will perform an inventory for CFCs (R12, R11 etc) used for air-conditioning and other purposes in the plants and will prepare a phase out plan in line with national legislation	(iv) Inventory is submitted; phase out plan is drafted and agreed with IFC.	LS+6 Months
PS4 Community Health, Safety and Security			
13.	Ensure that contracted logistic company trains drivers on H&S, checks drivers' health conditions, maintains trucks, follow speed limits	(i) Drivers' training logs are maintained. (ii) Drivers' medical records are maintained. (iii) Trucks' technical maintenance records	LS+9 Months

TAMEK (#30294) ENVIRONMENTAL AND SOCIAL ACTION PLAN – JANUARY 2011

Unless a specific plant name is not mentioned, all three plants are responsible for the action item

Item	Action	Completion Indicator	Timetable
		are available.	
PS 6 Biodiversity Conservation and Sustainable Natural Resources Management			
14.	Ensure that all wells are licensed by local authorities in Kiziksa and Karacabey plants. Commission an hydrogeological evaluation to ensure that the reserves of groundwater sources allow for the proposed extraction increase	(i) Send well licences/permits for all wells in use (iii) Ensure that the reserves of groundwater allow for the proposed extraction increase	LS+9 Months LS+ 12 Months