

Environmental and Social Action Plan

Project Mriya II, Ukraine (#30798)

Date: April 6, 2011

Issue	##	Actions	Deliverable	Due Date
PS1: Social and Environment Assessment and Management System				
Avoid/ mitigate or compensate E&S impacts associated with operation of new facilities	1.	a) Submit copies of positive conclusions of Environmental Authorities for silos (Derenivka, Khorostkiv, Kozova, Borschiv); and the seed plant; b) Develop E&S Management Plans for new operations to avoid/ mitigate negative impacts	a) Copies of positive conclusion of Environmental authorities for new silos and the seed plant; b) E&S Management Plans to avoid/ mitigate negative impact for new silos and the seed plant	a) Upon receiving documents from authorities; b) Prior to the commissioning of the facilities
Identify strengths, weaknesses, and opportunities of the current EHS management system, define key actions to effectively address future E&S impacts and health and safety risks to employees and communities	2.	Conduct an independent audit of the current EHS management system and related performance of Mriya's operations	a) Documents on competence (C.V., for instance) of the independent consultant, at IFC satisfaction; b) Copy of the contract with the independent consultant for conducting the audit, at IFC satisfaction; c) Copy of the Audit Report and timeline for the implementation of the corrective measures	a) August 2011; b) October 2011; c) February 2012;
Achieve development of the integral EHS management system to manage effectively the current and future EHS issues that might arise from	3.	Develop the corporate management program for further improvement of the EHS management system consistent with ISO 14001, OHSAS 18001, national, international and IFC's Performance Standards based	Corporate management program for further improvement of the EHS management system that will include objectives; key EHS performance indicators; responsibilities and timeframe for implementation	May 2012

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the rapid grow of operations		on findings of the above-mentioned audit		
	4.	Continuous implementation of the EHS management system	Progress reports in the Annual Monitoring Reports (AMR)	Annually
	5.	Refine the training program through adding special modules on environmental and OHS awareness for all groups of employees, including senior management	Training module on environmental and OHS awareness and best practices and training schedule	October 2011
Disclosure of E&S aspects of the project locally	6.	Disclose information about E&S aspects of the proposed IFC's investment locally in an appropriate manner	Document evidences to IFC's satisfaction	Before IFC Board approval
	PS2: Labor and Working Conditions			
Ensure compliance of working conditions and terms of employment of seasonal workers that constitute about 40% of Mriya's workforce with PS2	7.	Revise working conditions and terms of employment that, inter alia, define responsibility of the employer to provide safe workplace conditions, personal protective equipment, leave for illness, compensations in case of incidents	a) A copy of a revised contract with seasonal workers; b) Document evidences on completion of new contract s' signing with seasonal workers	a) June 2011; b) August 2011
Prevent potential risks to personnel and material assets associated with crop/grain unloading to silos' receiving bunkers/ hoppers	8.	Install designed-in protection shields/devices to cover hoppers between operations	Document evidence on installation (photos) of designed-in protection shields/devices to cover bunkers/ hoppers between operations for new silos operated by Mriya (Derenivka, Khorostkiv, Kozova, Borschiv)	Before the commissioning of the facilities
Improve working conditions of personnel handling crop protection products (pesticides)	9.	a) Complete a list of workers/ workplaces handling pesticides including new workplaces; b) Revise/ develop pest handling operational procedures for each	a) List of workers/workplaces handling crop protection products; b) Documentary evidence that adequate PPE has been provided to workers based	a) June 2011 b) July 2011

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		workplace; c) Arrange adequate training, product's Material Safety Data Sheets (MSDS)-based technical education for any chemical formulation employed, in the use of adequate PPE; d) Inventory of available Personal Protection Equipment (PPE) and ensure availability of adequate PPE for employees exposed to contact with products; e) Arrange regular cholinesterase testing of employees to define if specific employees should be allowed to continue such practices and what specific levels dictate when employees should cease participating in such activities; f) Adopt and implement the policy for workers rotation to avoid chronic exposures to specific pesticides.	upon MSDS; c) List of procedures and an example of a procedure; d) Training programs and schedule; e) Protocol for cholinesterase testing f) Policy for pest application workers rotation to avoid chronic exposures to specific pesticides	c) July 2011 d) August 2011 e) September 2011 f) November 2011
Improve safety work conditions of personnel under Mriya operation and control (grain production business and sugar plants)	10.	a) revise current operational and safety procedures, b) arrange regular safety training, c) internal monitoring of workplace conditions; d) arrange reporting on workplace safety conditions and statistic	a) List of revised procedures and an example of a procedure, b) Training program and a schedule, c) Plan and schedule for monitoring of workplace conditions; d) Procedure on internal reporting on safety conditions and statistics	a) June 2011 b) July 2011 c) August 2011 d) September 2011

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	PS 3: Pollution Prevention and Abatement			
Improvement of affiliated sugar plants' wastewater treatment systems to prevent contamination of soils and groundwater	11.	a) Install water meters at water supply and process water discharge systems before next operation period of sugar plants; b) Conduct internal assessment of wastewater systems' efficiency and develop a long-term gradual program for reconstruction of wastewater systems; reduction of areas occupied by sedimentation ponds and remediation of areas occupied by wastewater treatment systems	a) Document evidence on installation of water meters; b) Program for reconstruction of wastewater systems; reduction of areas occupied by wastewater treatment systems/sedimentation ponds and soil remediation of these areas	a) August 2011 b) March 2012
Continuous implementation of the Integrated Pest Management (IPM) Plan	12.	Adopt a corporate IPM statement/policy to ensure continuous implementation of IPM practices consistent with the international codes and WBG's EHS Guidelines	Corporate IPM statement/policy	July 2011
Hazardous materials handling	13.	Revise procurement procedure and contracts with suppliers/distributors through including requirements related to a set of documents supplied with crop production products: certificates, MSDS, recommended PPE, terms and conditions for disposal of empty containers	Copy of a typical revised procurement procedure and a revised contract with suppliers/distributors of crop production products	October 2011