

Environment & Social Action Plan
Galaxy Chemicals – Projects # 29246 & 3118 - Egypt
October 13, 2011

Action	Indicator of Completion	Required Completion Date
PERFORMANCE STANDARD 1 – SOCIAL AND ENVIRONMENTAL ASSESSMENT AND MANAGEMENT SYSTEMS		
1. Set up an effective EHS management system in accordance with the project construction and operation. - Draft all EHS programs and procedures for its operations - Obtain ISO 14000 certificate or demonstrate the effectiveness of the EHS management system	- Submit EHS programs and procedures for its operations. - Submit ISO 14001 certificate or audit reports showing the effectiveness of the EHS management system	- Prior to the trial production - Two years after the trial production starts.
2. Community Engagement: Hold a public consultation with local community, and develop a feasible community development plan.	- Minutes and records of the public consultation. - Submit feasible community development plan.	- Condition of Disbursement - Prior to the trial production
PERFORMANCE STANDARD 2 – LABOR AND WORKING CONDITIONS		
3. Prepare a qualified human resources (HR) policy and procedures for the Egypt operation that meet requirements of Egypt regulations and IFC Performance Standards	Submit copy of the HR policy and procedures	Three months prior to the trial production
4. Develop and implement a mechanism to assess Occupational Health and Safety (OHS) capacity of the contractors during construction. Draft procedures/programs to ensure that contractors have identified the existing hazards and that employees hired by the contractor companies have the proper training, have been informed about the risks, and are provided with adequate protective equipment.	- Copy of the mechanism to assess OHS capacity of the contractors during construction. - Submit reports on follow up of contractors during construction.	- Condition of Disbursement - Three months after disbursement

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PERFORMANCE STANDARD 3 – POLLUTION PREVENTION AND ABATEMENT		
5. Complete installation of membrane bio-reactor technology (MBR) to further treat wastewater and ensure the effluent meet World Bank Group EHS guideline limits - Complete installation and test MBR - Monitor and report to IFC liquid effluents parameters to ensure compliance with local and WBG limits when operating at normal conditions.	- Report of installation and test MBR - Monitoring results of liquid effluents showing compliance with local and WBG limits.	- Prior to the trial production - Six months after operations starts
6. Monitor and report to IFC air emission levels to ensure compliance with local and WBG limits when operating at normal conditions.	Monitoring results of air emissions showing compliance with local and WBG limits.	Six months after operations starts
7. Audit E&S performance of key raw material suppliers once every three years.	Audit reports for E&S performance of key suppliers	During project execution
PERFORMANCE STANDARD 4 – COMMUNITY HEALTH, SAFETY AND SECURITY		
8. Community Safety: Ensure that the community is informed for project danger and react promptly during emergency - Coordinate with neighboring companies and involve the local hospital, fire brigade, and representatives from nearby community in the emergency response drills. - Only contract with transportation companies that have defensive driving programs, acceptable safe driving records, and sufficient emergency response methods - Quarterly accident report from the hazardous material transportation companies	- Records of communications and coordination with relevant stakeholders. - Evidence of implementation of controls for transportation companies - Report hazardous material transportation companies through AMR.	- During project execution. - During project execution. - During project execution.