

Matco Project #34181
ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP) - Dated Nov 3, 2011

	Action	Deliverable	Responsible Person	Deadline
1	Provide copies of all clearance documents including environmental clearance/exemption letter from Pakistan EPA for Matco 1 and Matco 2 facilities.	Clearance documents from provincial EPA authorities confirming compliance with Pakistan environmental regulations	Mazhar Hussain Admin. Manager	Within 6 months of commitment
2	Amend the current environmental, health and safety policies, to incorporate the social aspects of IFC PSs and EHS guidelines. The social, environmental, health and safety management system (SEHS) will reflect consolidated policies, roles and responsibilities, implementation procedures and tools used across the various clearing and monitoring procedures.	SEHS manual and procedures	Asif Hussain HR Manager	Within 6 months of disbursement
3	Commission a fire/explosive atmospheres risk assessment, and develop mitigation measures on the basis of the assessment findings. The fire/explosive atmospheres risk assessment will be prepared by a suitably qualified professional acceptable to IFC. Agree with IFC a mutually acceptable time frame for implementing any corrective actions resulted from the fire/explosive risk assessment.	Audit report and CAP for each facility	M.Sarfraz uddin HSE Engineer	Within 6 months of commitment
4	Amend HR manual including grievance mechanism that conforms fully to PS2 requirements.	HR Manual	Asif Hussain	Within 6 months of disbursement
5	Conduct environmental audit to identify potential sources of non-compliance to effluent parameters. Develop and implement an action plan for non compliant parameters in air emissions/wastewater discharge to be acceptable to IFC to ensure compliance with EHS guidelines. Monitor air emissions & wastewater discharges from all sources to ensure compliance with relevant IFC EHS guidelines, and monitor energy and water use as part of overall energy/water savings program.	Action Plan for non compliance (wastewater discharge in particular BOD & COD) Annual monitoring reports	M. Sarfraz uddin HSE Engineer	Within 6 months of disbursement Within 12 months of disbursement
6	Ensure that third party security forces adhere to PS 4, and establish a community grievance mechanism.	Policy and procedures incorporated into SEHS	Mazar Hussain	Within 6 months of disbursement
7	Amend all suppliers' contracts with proper covenants to ensure full compliance with PS2 requirements for avoidance of child and forced labor in the supply chain.	Amended contracts for supply chain	Asif Hussain HR Manager	Within 3 months of commitment