

## PROJECT SAVA (#31667) ENVIRONMENTAL AND SOCIAL ACTION PLAN – MARCH 2012

Item	Action	Completion Indicator	Timetable
<b>PS1: Social and Environmental Assessment and Management Systems</b> <span style="float: right;"><i>(LS=Loan Signature)</i></span>			
1.	Hire/Assign a corporate Environment and Occupational Health, Safety Manager/Coordinator at MK Group level to coordinate and consolidate the implementation of the systems in all facilities.	(i) Submit CV and contract of the manager to IFC.	LS+ 6 Months
2.	Implement Environmental Management System in line with ISO14001 and Occupational Health and Safety Management System in line with OHSAS18001 and integrate to existing Quality Management System for Carnex	(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
3.	Create key environmental and safety performance indicators; eg. Water, energy use and solid waste formation per ton product and accident related lost time per employee to closely monitor the results of EHS improvements for Carnex.	(i) Submit monitoring results to IFC	LS+12 Months
<b>PS2: Labour and Working Conditions</b>			
4.	Review Group Level HR Policy and update in accordance with IFC's PS2	(i) Submit updated HR Policy	LS+6 Months
5.	Develop a system to monitor the working conditions of seasonal workers for MK Group's own and contracted farms. Ensure that the transportation, sheltering, eating and drinking facilities and working conditions of this seasonal workers are in line with local internationally recognized standards	(i) Submit procedures to IFC for review and comment.  (iii) Implementation of system as presented in the implementation plan.	LS+6 Months  LS+ 12 Months
6.	OHS Improvements;  - Establish written work permission system for hot works, work at height, stand alone worker, electrical works and confined space for all facilities	(i) Submit relevant forms and instructions to IFC	LS+12 Months

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	<p>- Implement work permit system, ensure implementation of LOTO (lock out tag out) system for maintenance and cleaning jobs, install padlocks for necessary equipments for all facilities</p> <p>- Periodically maintain ammonia tanks and compressors, provide detection system and ensure that necessary PPE are available ( special clothes, carbon filtered masks, eye and body showers etc) for Carnex</p>	<p>(ii) Submit the related photos and documents to IFC</p> <p>(iii) Submit maintenance records and details of detection system to IFC</p>	<p>LS+12 Months</p> <p>LS+12 Months</p>
<b>PS3: Pollution Prevention and Abatement</b>			
7.	Undertake a water audit and study including the pig farms, and identify measures to improve water usage efficiency for Carnex.	<p>(i) Submit Audit Action plan to IFC</p> <p>(ii) Provide evidence to IFC that the program is implemented.</p>	<p>LS+12 Months</p> <p>LS+18 Months</p>
8.	Commission waste water treatment plant being constructed in Carnex	(i) Provide monitoring results of BOD, COD, SS, O&G to IFC	LS+12 Months
9.	Provide permits for waste water lagoons for pig farms	(i) Submit permits to IFC	LS+36 Months
10.	Implement all actions related to air emission at the existing action plan for Sunoko Sugar Plants	(ii) Provide updated action plan	AMR Submission