

Chipita Turkey (#32940) ENVIRONMENTAL AND SOCIAL ACTION PLAN – October 2013

Item	Action	Completion Indicator	Anticipated Completion Date
PS1: Social and Environmental Assessment and Management Systems			
1.	Chipita SA will define and implement a corporate EHS Policy which will apply to its existing and future operations complying with legal and regulatory requirements of the host country as well as IFC Performance Standards and WBG EHS Guidelines.	Submission of the draft EHS policy for IFC review and approval	March 2014
2.	Chipita Turkey will apply and obtain from the local authorities all necessary operational permit and licenses	Submission of official letter from the authorities indicating operational permit	Prior to start up
3.	<p>-Chipita SA will design and implement an Integrated Environmental, Occupational Health and Safety Management System(ESMS) to be consistent with ISO 14001, OHSAS 18001 and HACCP/ISO 22001 and in accordance with IFC PS1 requirements to be reviewed and approved by IFC, defining roles and responsibilities, and other necessary elements (manual procedures) to enable it to comply with local laws and regulations, IFC Performance Standards and applicable WBG's Environmental, Health and Safety Guidelines.</p> <p>Chipita SA will appoint an EHS coordinator who will be responsible for implementing corporate ESMS and fulfilling the ESAP conditions</p>	<p>(i) ESMS design in place and approved by IFC</p> <p>(ii) Submission of the evidence of complete implementation (e.g. draft documentation of the ESMS, plans, manual procedures and programs, e.g training logs, monitoring records, minutes of progress reviews).</p> <p>(iii) Submission of CV and qualifications/training background of the appointed personnel for IFC review.</p>	<p>(i) June 2014</p> <p>(ii) December 2014</p> <p>(iii) March 2014</p>
4.	Chipita Turkey will develop a comprehensive EHS training program, including technical terms for quality, environment and safety as well as OHS risks of each job	Submission of training log, training material and records	(i) December 2014
5.	Chipita Turkey will prepare an Emergency Preparedness and Response Plan that addresses the responsibilities of the emergency response team, and specific emergency response actions for each emergency situation (accident, earthquake, fire, road accident and spill) reflecting the final operational settings for the operational phase.	(i) Submission of the copy of the Emergency Preparedness and Response Plan for the operation phase	(i) December 2014
6.	Chipita Turkey will develop an extensive EHS monitoring program, including monitoring of air emissions, solid wastes, effluents and occupational accidents, trainings, effectiveness of the management program, as well as compliance with any relevant legal and/or contractual obligations and regulatory requirements	Submission of the monitoring program to IFC	(i) March 2014
7.	Chipita Turkey will conduct detailed risk analyses in scope of the management system to identify major OHS risks and implement necessary mitigation measures to minimize those risks	Submission of risk analysis studies for the operation phase	Prior to start up

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8.	<p>As part of the ESMS, Chipita SA will develop and implement procedures to ensure compliance of suppliers with IFC PS1, PS2 and PS6' supply chain related requirements. These procedures will include:</p> <ul style="list-style-type: none"> - Develop and implement written procedures to identify harmful child labor, forced labor, and biodiversity issues related to farmer encroachment into protected areas or areas of high biodiversity. - Agreement with suppliers: include provisions into agreements with suppliers to ensure no child labor, no forced labor, and no issues related to biodiversity or land disputes for the renewed contracts. 	<ul style="list-style-type: none"> (i) Submission of risk assessment to IFC (ii) Submission of procedures to IFC (iii) Submission of the copy of relevant part of contracts to IFC 	<ul style="list-style-type: none"> (i) When new commodity and country selected (ii) June 2014 (iii) December 2014
9.	A formalized community grievance mechanism for all Chipita Turkey facilities regarding the requirements of IFC's PS requirements will be established	Submission of the Community Grievance Procedures to IFC	(i) December 2014
PS2: Labour and Working Conditions			
10.	<p>Chipita Turkey will develop a Human Resources policy applicable to both direct and contractor employees to include all of the key requirements of IFC's PS2 on labor and working conditions (e.g. Non-discrimination, freedom of association and collective bargaining, child labor and forced labor) and will communicate to all employees</p> <p>Chipita Turkey will develop a formal employees' grievance mechanism and will give training to workers on how the mechanism works and will ensure that communication channels works efficiently between all levels of employees</p>	<ul style="list-style-type: none"> (i) Submission of the documented evidences to IFC (ii) Submission of the documented evidences to IFC 	<ul style="list-style-type: none"> (i) Before 1st disbursement (ii) December 2014
11.	Chipita Turkey will develop and implement a procedure for monitoring compliance of contractors with PS 2 requirements.	Submission of the procedure to IFC	Prior to Contractor Work for the facility
12.	Chipita Turkey will develop an OHS procedures, including the key elements such as a permit to work system, lock out tag out procedures, chemical management to ensure prevention of accidental release and use/installation of secondary containments, monitoring of exposure to vibration	<ul style="list-style-type: none"> (i) Submission of the OHS procedures to IFC (ii) Submission of the evidence of implementation of the OHS procedures 	<ul style="list-style-type: none"> (i) March 2014 AMR Submission
13.	Chipita Turkey will develop a preventive maintenance program applicable to all machines and equipment used in the workplace and will ensure high risk equipments are periodically checked and certified by external authorized agencies to confirm their safe operation	Submission of the Preventive Maintenance Program to IFC	(i) December 2014
PS3: Pollution Prevention and Abatement			

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14.	- Chipita Turkey will undertake a study in order to assess energy and water use efficiency against industry benchmarks as outlined in the WBG's EHS sector specific guidelines and to monitor its carbon footprint.	Submission of monitoring results in the AMR	AMR Reporting- on-going
15.	Chipita Turkey will monitor on an annual basis stack air emissions from its boiler and generators to ensure consistency with WBG EHS Guidelines for point source emissions to air and will report them in the IFC Annual Monitoring Report.	Submission of monitoring results in the AMR	AMR Reporting- on-going
16.	Chipita SA will develop a waste management plan, including the types of wastes, sources, amounts and appropriate disposal methods to deal with solid waste, hazardous waste and domestic sanitary waste in accordance with Good International Industry Practices.	Submission of the waste management plan to IFC	AMR Reporting- on-going
PS4: Community Health, Safety and Security			
17.	Chipita SA will develop and implement a community engagement procedure to be included into the ESMS, including a mechanism for receiving, addressing and resolving community grievances and complaints in line with IFC's requirements	Submission of the copy of the procedure for IFC review and approval	June 2014