

KK Kingston (28111)
Environmental and Social Action Plan (ESAP)

	Action	Deliverable	Due Date
Environmental and Social Management System			
1.	<p>EH&S Position at Corporate Level KK Kingston will either designate an individual within the organization or hire a new person with responsibility and authority for all environmental, social, health and safety (ESHS) and labor matters at the company. The individual's role will be clearly defined, including a written job description, and sufficient management authority and resources will be provided to ensure compliance with relevant and applicable laws and regulations. The individual will ensure consistency with good international industry practice for ESHS performance and maintain compliance with all regulatory and IFC requirements, prior to and beyond implementation of a certification regime.</p>	Documentary Evidence - Position creation - Reporting line - Hiring notice	Condition of Disbursement (COD) - First
2.	<p>Certification of Management Systems KK Kingston is currently working on achieving the following certifications (i) ISO 9001 for Quality (ii) HACCP for Food Safety</p>	Documentary Evidence - Certification by an Accredited Agency	June 30, 2011
3.	<p>Integrated Environmental and Social Management System KK Kingston will implement an integrated ESH&S management system to provide continued oversight of ESH&S for all its operations and those of its subcontractors. The management system must ensure consistency with good international industry practice for ESHS performance and maintain compliance with all regulatory and IFC requirements. Specifically, the Management system must include (but not limited to): (i) Screening of business opportunities against IFC Performance Standards (PS 1 through PS 8). (ii) Integrated OHS functions – training, monitoring, and reporting. (iii) Procurement procedures to provide oversight and contractually require that its suppliers and subcontractors comply with national regulatory requirements and KK Kingston's ESHS policies. (iv) Procedures for communicating environmental and social aspects to external interested parties, including clear procedures for receiving, documenting and responding to concerns from any external interested parties related to the project.</p>	Documentary Evidence - Operating Procedure and Policy - Procedures on Community Engagement	June 30, 2010

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Labor and Working Conditions			
4.	<p>Review HR Policies and Procedures KK Kingston will review and update its existing HR policies and procedures to ensure formal documentation of its policies and procedures to ensure operational consistency with IFC Performance Standard 2 on Labor and Working Conditions. Specifically, this must include explicit reference to (but not limited to):</p> <ul style="list-style-type: none"> (i) Principles of non-discrimination and equal opportunity; (ii) Freedom of association; and (iii) Grievance procedures. 	Documentary evidence - Employee Handbook	COD – First
5.	<p>Workplace Safety Review with external assistance KK Kingston’s OHS policies, procedures and training program for consistency with good international industry practice. Review of OHS procedures must include bleach manufacture and safe handling of Chlorine gas. Specific milestones are:</p> <ul style="list-style-type: none"> (i) Identify suitable Consultant; obtain quote for services and agree on timing of review. (ii) Completion of review by consultant and allocation of resources; and (iii) Implement recommendations from consultant review. 	Documentary evidence (i) Copy of Contract (ii) Consultant Review and Recommendation (iii) Implementation plan with resource (management + fiscal) allocation	(i) COD – First (ii) + 180 days (iii) + 360 days
Pollution Prevention and Abatement			
6.	<p>Discharge of Treated Process and Sanitary Wastewater and Stormwater</p> <ul style="list-style-type: none"> (i) Identify suitable supplier of wastewater treatment system, obtain quote for suitable water treatment system, and include cost of purchase and commissioning of water treatment system in capex budget for 2010. (ii) Performance Guarantee from Supplier/Vendor for all KK Kingston operations. <ul style="list-style-type: none"> - Validation of adequacy of wastewater treatment system to meet consistent compliance with local regulatory requirement and IFC guidelines for the direct discharge of treated effluent to surface water. Specifically, the wastewater treatment plants have to meet effluent discharge standards shown in the relevant IFC Sector Guideline, and better than or equal to for (but not limited to): <ul style="list-style-type: none"> a. BOD and COD of 30 mg/L and 250 mg/L respectively b. TSS of 10 mg/L c. Total Nitrogen of 10 mg/L d. Total Phosphorus of 2 mg/L e. Coliform of 400 MPN/100 mL (iii) Storm water management plan (must include plan to mitigate accidental release of product/chemicals on plant property). Specifically: <ul style="list-style-type: none"> a. Stormwater management plan b. Implementation of identified mitigation measures 	Documentary evidence (i) Fiscal Allocation for Equipment and Training. (ii) Legally binding Performance Guarantee from Supplier/Vendor and Equipment Commissioning Date. (iii) Stormwater Management Plan	(i) COD – First (ii) + 360 days (iii) + 360 days

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7.	<p>Disposal of Hazardous Wastes Review with external assistance KK Kingston’s hazardous waste disposal procedures and assess alternatives available for the safe disposal, and implement remedial actions that are protective of human health and the environment. Specific milestones are:</p> <ul style="list-style-type: none"> (i) Identify suitable Consultant; obtain quote for services and agree on timing of consultants review. (ii) Completion of review by consultant and allocation of resources; and (iii) Implement recommendations from consultant review. 	<p>Documentary evidence</p> <ul style="list-style-type: none"> (i) Copy of Contract (ii) Consultant Review and Recommendation (iii) Implementation plan with resource (management + fiscal) allocation 	<ul style="list-style-type: none"> (i) COD – First (ii) + 180 days (iii) + 360 days
Community Health, Safety and Security			
8.	<p>Update Emergency Response Procedures for Chlorine Gas Handling KK Kingston will review and update its procedures, training and infrastructure to ensure safe operations and emergency response associated with transportation, storage and handling of chlorine gas used in bleach manufacturing operations. Updated procedures must include a community involvement component that addresses communication of risk, appropriate behavior, and safety measures to be implemented in the event of release of chlorine gas. Specific milestones are:</p> <ul style="list-style-type: none"> (i) Identify suitable Consultant; obtain quote for services and agree on timing of consultants review (ii) Completion of review by consultant and allocation of resources; and (iii) Implement recommendations from consultant review. 	<p>Documentary evidence</p> <ul style="list-style-type: none"> (i) Copy of Contract (ii) Consultant Review and Recommendation (iii) Updated procedures and implementation plan with resource (management + fiscal) allocation 	<ul style="list-style-type: none"> (i) COD – First (ii) + 90 days (iii) + 120 days