

GLORIA S.A. CORRECTIVE ACTION PLAN

Environmental, Health and Safety Action Item	Completion Schedule
1. Huachipa Plant: ▪ Complete Preliminary Environmental Diagnosis [Diagnostico Ambiental Preliminar (DAP)] and incorporate International Finance Corporation/World Bank Group (IFC/WBG) policies and guidelines requirements including numerical guideline limits on discharges to the environment, occupational safety and health program statistics including workplace monitoring, and solid and hazardous waste management; ▪ Complete the Environmental Compliance Program [Programa de Adecuacion al Medio Ambiente (PAMA)] and incorporate IFC/WBG numerical guideline limits for liquid effluents, air emissions, occupational safety and health statistics, and solid and hazardous waste management into monitoring and compliance requirements; ▪ Submit the PAMA to INRENA and IFC for review; Implement the PAMA ▪ Institutionalize all measures in the PAMA required to sustain compliance with Peruvian environmental and social regulations and IFC/WBG environmental and social policies and guidelines.	December 2001 February 2002 February 2002 July 2003
2. Huachipa Plant: ▪ Complete construction of industrial wastewater treatment plant at Huachipa; ▪ After start-up, submit analytical laboratory results for three months. ▪ Prepare side-by side-comparison of treated effluent parameters data with IFC/WBG guideline and Peruvian regulatory limits for treated wastewater parameters. ▪ Submit data results and comparisons to IFC.	October 2002 February 2003 February 2003 February 2003
3. Huachipa Plant: ▪ Complete construction of sanitary wastewater treatment plant at Huachipa; ▪ After start-up, submit analytical laboratory results for three months.	December 2001 April 2002

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▪ Prepare side-by side-comparison of treated effluent parameters data with IFC/WBG guideline and Peruvian regulatory limits for treated wastewater parameters. ▪ Submit data results and comparisons to IFC.	April 2002 April 2002
4. Arequipa Plant: ▪ Update the preliminary Environmental Diagnosis [Diagnostico Ambiental Preliminar (DAP)] and incorporate International Finance Corporation/World Bank Group (IFC/WBG) policies and guidelines requirements including guideline limits on discharges to the environment, occupational safety and health program statistics and solid and hazardous waste management data; ▪ Complete the Environmental Compliance Program [Programa de Adecuacion al Medio Ambiente] (PAMA) and incorporate IFC/WBG guidelines limits for liquid effluents and air emissions, occupational safety and health statistics, and solid and hazardous waste management data into monitoring and compliance requirements; ▪ Submit the PAMA to IFC and INRENA for review; Implement the PAMA; ▪ Institutionalize all measures in the PAMA required to sustain compliance with Peruvian environmental and social regulations and IFC/WBG environmental and social policies and guidelines in accordance with the execution term provided by Peruvian Regulations.	January 2002 April 2002 April 2002 August 2003 – August 2007
5. Arequipa Plant: ▪ Implement technical actions to bring steam boiler emissions into compliance with IFC/WBG guidelines limits for particulate matter and NO₂ and into compliance with IFC/WBG guideline and Peruvian numerical limits regulations for SO₂. ▪ After start-up, submit air emissions data for three months. ▪ Prepare side-by side-comparison of air emissions data with IFC/WBG guideline and Peruvian regulatory numerical limits for air emissions.	July 2002 November 2002 November 2002

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Submit data results and comparisons to IFC.	November 2002
6. Arequipa Plant: - Bring treated liquid effluent into compliance with Peruvian regulations and IFC guidelines for BOD₅ and other treated liquid effluent quality parameters. - Submit analytical laboratory results for three months; - Prepare side-by side-comparison of treated effluent parameters data with IFC/WBG guideline and Peruvian regulatory numerical limits for treated wastewater parameters. - Submit data results and comparisons to IFC.	March 2003 June 2003 June 2003 June 2003
7. Cajamarca Plant - Prepare a Preliminary Environmental Diagnosis [Diagnostico Ambiental Preliminar] (DAP)] and incorporate International Finance Corporation/World Bank Group (IFC/WBG) policies and guidelines requirements including guideline limits on discharges to the environment, occupational safety and health program statistics and solid and hazardous waste management data; - Submit DAP to IFC for review and comment; - Prepare an Environmental Compliance Program [Programa de Adecuacion al Medio Ambiente (PAMA)] and incorporate IFC/WBG guidelines limits for liquid effluents, air emissions, occupational safety and health statistics, and solid and hazardous waste management data into monitoring and compliance requirements; - Submit the PAMA to INRENA and IFC for review. Implement the PAMA. - Institutionalize all measures in the PAMA required to sustain compliance with Peruvian environmental and social regulations and IFC/WBG environmental and social policies and guidelines in accordance with the execution term provided by Peruvian Regulations.	January 2002 February 2002 June 2002 June 2002 November 2003 – November 2007

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8. Cajamarca Plant ▪ Submit analytical data for treated sanitary and industrial wastewater effluents at Cajamarca; ▪ Submit analytical data for air emissions from Cajamarca plant; ▪ Submit analytical laboratory and/or on-site testing data results for three months. Provide side-by-side-comparison of performance data with IFC/WBG numerical guideline and Peruvian regulatory numerical limits for treated wastewater parameters and air emissions. ▪ Prepare technical solutions and implementation schedules for remedial measures needed to bring discharges to the environment into compliance with IFC/WBG guidelines and Peruvian regulations. ▪ Complete all required changes to sanitary and industrial wastewater treatment works to bring treated liquid effluent into compliance with World Bank Group guidelines ▪ Complete all required changes to combustion and process equipment to bring air emissions into compliance with World Bank Group guidelines ▪ Institutionalize all measures in the PAMA required to sustain compliance with Peruvian environmental and social regulations and IFC/WBG environmental and social policies and guidelines in accordance with the execution term provided by Peruvian Regulations.	January 2002 January 2002 May 2002 May 2002 August 2002 June 2003 June 2003 November 2003 – November 2007
9. Cajamarca Plant ▪ Submit current data to IFC on Occupational Safety and Health Statistics; ▪ Submit current data to IFC on Solid and Hazardous Waste Management.	October 2001 October 2001
10. Farpasa Pharmaceutical ▪ Commence monitoring of liquid effluent discharged to sanitary sewer to determine compliance with Sedapal regulatory limits for discharges to public sewerage. ▪ Develop pretreatment scheme for Farpasa effluents if monitoring program illustrates exceedances in Sedapal regulatory levels.	October 2001 February 2002

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Construct any required pretreatment to comply with Sedapal regulatory requirements.		August 2002
11. Gloria S.A. Annual Environmental and Social Performance Monitoring Report Collaborate with IFC and reach mutual agreement on format and technical content of an annual report for Gloria S.A. milk product operations in Arequipa, Huachipa and Cajamarca and for other Gloria S.A. operations: Planta Centro Papelero El Augustino and Planta Farpasa.		October 2001
12. Gloria S.A. Manufacturing Operations – Energy Plans Prepare Energy Plans for all manufacturing plans using the IFC model as a guideline. Establish corporate responsibility, individual plant responsibilities, committees and goals in each plant. Report to IFC annually on the principal energy indicators, quantities used during the year, reductions from previous years, activities undertaken to reduce energy use, and ways and means of motivating employees and stimulating ideas for reduction of energy use in all plants.		December 2001

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