

Conaprole (24791)
Environmental and Social Action Plan (ESAP)

#	Action	Responsible	Deliverable	Deadline
I. Environmental, Health and Safety Assessment and Management Systems				
1.	<u>Conduct an Environmental and Social Impact Assessment (ESIA) for proposed project at Plant 8.</u> This study will consider the potential risks and impacts of all stages of the project cycle. The study will include an environmental and social management plan and listing of mitigation measures.	Conaprole	Provide IFC a copy of the ESIA for review and comment, and evidence of local disclosure and consultation around this document.	Condition of first disbursement
2.	<u>Develop and implement an Environmental, Health & Safety, and Social Policy.</u> The policy will include social (including community engagement and development), environmental, and occupational health and safety management commitments in compliance with IFC performance standards. a) Develop the ESHS Policy document b) Implementation of the ESHS Policy	Conaprole	- Point a), Provide IFC with a copy of the ESHS Policy document. - Point b), submit progress report of implementation of ESHS policy	Point a is Conditions of first disbursement Point b August 31, 2007
3.	<u>Develop an “Environmental and Social Department” and assign clear responsibilities for environmental and social issues to qualified professional for the Group’s operations.</u> a) Conaprole will establish a “Corporate Environment and Social Department”, reporting directly to senior management, with adequate level of authority and close coordination with safety coordinators in each operation, to implement the ESHS policy and ensure compliance with Uruguay and IFC policies and guidelines requirements b) Conaprole will appoint a Corporate Environmental and Social Manager .One of the main responsibilities of this professional will be the	Conaprole	Provide IFC with a copy of the internal memorandum creating the Corporate Environment and Social Department, and the appointment of the Manager, endorsed by Conaprole’s highest corporate management level	Points a and b are Conditions of first disbursement

	implementation of the integrated management system (ESMS) at a Group level and at each operation.			
4.	<u>Develop a Plan for the implementation of an Integrated Management System for Environment, Health and Safety and Social Issues.</u> This plan will indicate activities, responsible people, and timeframes specifying the way Conaprole will plan, implement, monitor, report and review their management system.	Conaprole	Provide IFC the implementation plan for review	May 31, 2007
5.	<u>Implement an Integrated Management System for Environment, Health and Safety and Social Management.</u> The integrated management system will incorporate the following elements: (i) organizational capacity; (ii) training; (iii) community engagement; (iv) monitoring; and (v) reporting and will be commensurate with potential impacts. The system will be designed to ensure compliance with Uruguayan national law and IFC performance standards and guidelines requirements.	Conaprole	Internal audit report to IFC for review	September 30, 2008
II. Labor and Working Conditions				
6.	<u>Develop induction training program for new employees.</u> All new employees will receive an induction training where all policies, guidelines, environmental and social risks and impacts, and ways of working are explained in detail.	Conaprole	Provide IFC with a copy of the training material	August 31, 2007
7.	<u>Occupational Health and Safety.</u> Conaprole will conduct a health and safety risk evaluation study in all plants. A corrective action plan will be developed and actions implemented.	Conaprole	Provide IFC a copy of the evaluation study, the corrective action plan and implementation schedule for review.	August 31, 2007
III. Pollution Prevention and Abatement				
8.	<u>Particulate Stack Emissions</u> - Conduct particulate stack emissions measurements for all operating boilers at all plants during production peak. - During the same period, undertake stack emissions particulate distribution analysis using actual stack emissions data. Compare projected levels to IFC's General Environmental Guideline for ambient air concentrations.	Conaprole	Provide IFC with a report of the stack emissions measurements and the stack emissions particulate distribution analysis.	December 31, 2007
9.	<u>Effluent Management Plan.</u>	Conaprole	a) Present to IFC the	Point a) is

	a) Conaprole will present an Effluent Management and Monitoring Plan to ensure effluents at all plants are in compliance with national laws and regulations and IFC guidelines. This plan will include an implementation schedule for all plants indicating the corrective actions needed to bring discharged effluent levels into compliance with IFC guideline levels. b) Implementation of the Effluent Management and Monitoring Plan.		management and monitoring plan including implementation schedule. b) Data for all plants	Condition of first disbursement Point b) May 31, 2007 for Plants 10, 14, 11 y 16. August 31, 2007 for Plants 7 CIM. March 31, 2008 for Plants 9. Plant 8 to be ready in November 30, 2008
10.	<u>Conduct a comprehensive chemical/physical/microbiological assessment of groundwater and establish a baseline at all plant.</u> For all plants that are using untreated effluent and sludge in land application, and for those that have ponds that are not lined an annual groundwater monitoring report will be required. If assessment demonstrates deterioration, Conaprole will take specific action to mitigate the situation. Sample locations, parameters and methodology will be determined as per a groundwater monitoring study.	Conaprole	Provide IFC with a groundwater monitoring study for all affected plants.	August 31, 2007
11.	<u>Odor issue at Villa Rodriguez:</u> Present an action plan in order to solve the problem at Villa Rodriguez in relation to odor coming from untreated effluents.	Conaprole	Present action plan to IFC for review and approval	Condition of first disbursement
IV. Biodiversity Conservation and Sustainable Natural Resource Management				
12.	<u>Monitoring of sustainable wood supply:</u> Conaprole will purchase wood from suppliers that have introduced sustainable forest management practices for their plantations, and are certified by an independent agency.	Conaprole	Proof of certification from suppliers	March. 31, 2007

V. Community Engagement and Disclosure				
13.	<u>Update community engagement process:</u> Conaprole will disclose appropriate information to affected communities and relevant government agencies, and inform affected communities of significant risks and impacts.	Conaprole	Present to IFC a copy of the updated process	Condition of first disbursement
14.	<u>Develop and implement a grievance mechanism.</u> Conaprole will also appoint a senior manager as responsible for evaluation, action and monitoring of corrective actions.	Conaprole	Present to IFC a copy of the grievance mechanism for review	May 31, 2007