

Nicaragua Sugar (25331)
Environmental Action Plan (EAP)

#	Action	Responsible	Deliverable	Deadline
1.0 <u>Environmental, Health, and Safety Assessment and Management Systems</u>	<u>Integrated Management Systems</u> NSEL will update their current management system in order to include all requirements of IFC performance standards. New ESIAs will comply with requirements of Nicaragua law and IFC performance standards.	NSEL	Provide IFC copies of the modifications of the management system as specified.	Condition of disbursement
2.0 <u>Labor and Working Conditions</u>	<u>Records on Contractor Compliance with Legal Work Regulations</u>			
	a) Starting with the 2006-2007 harvest, NSEL will develop a record keeping mechanism to register their supervisory field and mills visits to ensure contractor compliance with legal work and safety regulations	NSEL	Provide IFC with a copy of the communication sent to contractors concerning the human resources policy (including disciplinary actions), and signed by NSEL top administration manager.	Condition of disbursement
	b) Establish worker grievance mechanisms for contracted personnel and a disciplinary policy for contractors	NSEL	Provide IFC with a copy of the procedure.	March 2007

<u>3.0 Pollution Prevention and Abatement</u>	<u>Particulate Stack Emissions</u> a) Conduct particulate stack emissions measurements for the three operating boilers at ISA during all the 2006-2007 harvest b) During the same period, undertake stack emissions particulate distribution analysis using actual stack emissions data	NSEL	Provide IFC with a report of the stack emissions measurements and the stack emissions particulate distribution analysis.	June 2007
	<u>Alpha Boiler:</u> NSEL will retrofit the Alpha Boiler with an emissions scrubber during the maintenance period after the 2006-2007 harvest season to reduce the stack emissions to <100 mg/m ³		• Technical report to IFC • Report of the stack emissions measurements	July 2007
	<u>Retrofit stack emissions controls:</u> NSEL will retrofit stack emissions controls in the event that particulate emissions exceed ambient limits established in IFC's General Environmental Guidelines		Technical report to IFC	June 2007
	<u>Sanitary landfill:</u> A sanitary landfill will be implemented for the 2006-2007 harvest (Zafra) maintenance period		Construction plans to be presented to IFC	January 2007
<u>4.0 Biodiversity Conservation and Sustainable Natural Resource Management</u>	<u>Monitoring of sustainable management of natural resources</u> NSEL will develop a plan for achieving certification of sustainable forest management for their eucalyptus plantation, in compliance with IFC's PS6 requirements	NSEL	Plan with timeline acceptable to IFC	January 2007