

**Monte Rosa
Environmental and Social Action Plan (ESAP)**

	Action	Deliverable	Deadline
Integrated Management System			
1.	<p>EH&S Position at Operational Level Monte Rosa will either designate an individual within the organization or hire an outside professional that who have responsibility and authority for all environmental, health and safety, and social matters at Monte Rosa. 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.</p>	<p>Documentary Evidence of:</p> <ul style="list-style-type: none"> - position creation - reporting line - hiring notice 	October 2007
2.	<p>Implement an Integrated Management System for Environment, Social, and Health and Safety (EHSS) matters at Monte Rosa Monte Rosa will consolidate all current systems into an integrated management system that will incorporate the following elements: (i) staff responsible for EHSS issues; (ii) training on EHSS issues (e.g. effluent management, occupational health and safety at work; working conditions at plantations, solid waste management; etc); (iii) community engagement, including clear procedures on disclosure and consultation with affected communities; (iv) monitoring; and (v) reporting. The management system will address identified environmental, health and safety, and social impacts and risks of all existing and future acquisitions and operations at the company and subsidiaries. As part of the implementation, Monte Rosa will develop management programs, procedures, monitoring and reporting protocols, and provide training to employees.</p>	Documentary Evidence to IFC's satisfaction	June 2008
3.	<p>Environmental and Human Resources Policy at Monte Rosa</p> <ul style="list-style-type: none"> (i) Update Company's Environmental Policy in order to include all requirements of IFC Performance Standard on S&E Management Systems (PS1). (ii) Update Company's Human Resources Policy in order to include all requirements of IFC Performance Standard on labor and working conditions (PS2). Include references to non-discrimination, freedom of association and collective bargaining, child labor and forced labor in the supply chain. 	Documentary Evidence	<ul style="list-style-type: none"> (i) September 2007 (ii) October 2007
4.	<p>Environmental and Social Assessment The environmental aspects included in the evaluation done at the Monte Rosa mill cover only pollution prevention and abatement at the mills. Monte Rosa will need to perform an environmental and social assessment for all new projects and expansions, which need to include all aspects (e.g. community health and safety, biodiversity, energy efficiency, labor</p>	Creation of new procedures in the ESMS	September 2007

	and working conditions, etc.) covered under IFC's Performance Standards, which include consultation and community development, labor aspects, supply chain issues, greenhouse gas emissions, community health and safety, cultural heritage and sustainable management of resources.		
5.	Grievance mechanism Monte Rosa has a system to deal with external queries, concerns, and grievances that is used and well understood locally. In keeping with best practice, they will write this process up formally and include it in relevant written public communications.	Provide IFC with a copy of the written procedure.	June 2008
6.	Update procedure for selection of sugar cane suppliers and woodchips suppliers As part of this management system, Monte Rosa should also include environmental criteria (government permits for land clearance and habitat alteration) for the selection of sugar cane suppliers and woodchip suppliers.	Documentary evidence	December 2007
Pollution prevention and Abatement			
7.	GHG emissions Monte Rosa will develop an annual stack monitoring program for the quantification of GHG emissions from all its facilities.	Annual Report	Data submitted in annual AMR
8.	Land Application of Process Wastewater Monte Rosa will develop a groundwater monitoring plan to quantify the impact to groundwater from storage and irrigation of process wastewater from the sugar mill. Review will be conducted by qualified external professional acceptable to IFC. TOR for study will be developed in consultation with IFC. (i) Retain consultant to complete groundwater study (ii) Final report with recommendations and implementation schedule (iii) Implementation of recommendations (iv) Reporting of groundwater monitoring data	(i) Copy of contract and TOR (ii) Copy of final report (iii) Documentary evidence (iv) Monitoring Report	(i) COD (ii) December 2007 (iii) Timeline to be agreed with IFC by January 2008 (iv) Included in annual AMR
9.	Miscellaneous Wastewater Monte Rosa will review its management of process, sanitary, miscellaneous wastewaters and stormwater from the sugar mill in a manner consistent with good international industry		

	<p>practices, and in compliance with applicable WB/IFC guidelines. Review will be conducted by qualified external professional acceptable to IFC. TOR for study will be developed in consultation with IFC.</p> <ul style="list-style-type: none"> (i) Retain consultant to complete wastewater study (ii) Final report with recommendations and implementation schedule (iii) Implementation of recommendations (iv) Reporting of sanitary, miscellaneous wastewaters and stormwater data 	<ul style="list-style-type: none"> (i) Copy of contract and TOR (ii) Copy of final report (iii) Documentary evidence (i) Monitoring Report 	<ul style="list-style-type: none"> (i) COD (ii) December 2007 (iii) Timeline to be agreed with IFC by January 2008 (iv) Included in annual AMR
10.	<p>Conduct a cost benefit analysis for energy recovery from Process Wastewater</p> <ul style="list-style-type: none"> (i) Monte Rosa will conduct a cost benefit analysis of energy recovery alternatives from process wastewater from its sugar mill. The review should include a technical and economic analysis of various alternatives available that are consistent with good international industry practice for the sector. (ii) Implement most efficient energy recovery alternative. 	Copy of Final Report	(i) and (ii) June 2008
11.	<p>Air Emissions</p> <p>Monte Rosa will review emissions at their sugar mill (while using bagasse and Bunker C) against local regulations as well as applicable IFC/WB guidelines. Review will be conducted by qualified professional acceptable to IFC.</p> <ul style="list-style-type: none"> (i) Retain consultant to complete air emissions study (ii) Final report with recommendations, implementation schedule and budget allocation (iii) Implementation of recommendations and independent verification (iv) Reporting of air emissions data 	<ul style="list-style-type: none"> (i) Copy of contract and TOR (ii) Copy of final report (iii) Documentary evidence (iv) Monitoring Report 	<ul style="list-style-type: none"> (i) August 2007 (ii) May 2008 (iii) Timeline to be agreed with IFC by June 2008 (iv) Included in annual AMR

Specific Issues			
12.	Occupational Health & Safety at company and subsidiaries Monte Rosa will monitor and report accident statistics at their sugar mill and all plantations.	Monitoring Report	Annual Monitoring Report
13.	Solid Waste Monte Rosa will review its management of solid waste at Monte Rosa in a manner consistent with good industry practice and in compliance with applicable WB/IFC guidelines. (i) Retain responsible person to complete solid waste study (ii) Final report with recommendations, implementation schedule and budget allocation (iii) Implementation of recommendations and independent verification (iv) Reporting of solid waste data	(i) Name of person and qualifications (ii) Copy of final report (iii) Documentary evidence (iv) Monitoring Report	(i) September 2007 (ii) December 2007 (v) Timeline to be agreed with IFC by January 2008 (iii) Included in annual AMR

COD – Condition of Disbursement; LS – Loan signature