

Environmental and Social Action Plan
ECOM – APRIL 2008

	Action	Deliverable	Deadline
Integrated Management System			
1.	Implement an Integrated Management System for Environment, Social , and Health and Safety (EHSS) Management at corporate and all subsidi aries Implement an integrated management system that will incorporate the following elements: (i) organization; (ii) training; (iii) community engagement, including clear procedure on disclosure and consultation with affected communities; (iv) monitoring; and (v) reporting. The management program will address identified environmental & health and safety impacts and risks of all existing and future operations. The management system should also provide oversight of ESH&S performance of the supply chain. i. EHS organization: ECOM will assign a qualified professional to manage the environmental, health and safety, and social performance of their operations. This position should be at a corporate level and report directly to senior management. ii. Environmental and Social Policy: ECOM to develop and implement an environmental and social policy addressing all provisions in IFC performance standards. iii. Implementation of management system at all subsidiaries: - o Present an implementation plan with schedule, action items and responsibilities. - o Final implementation	i. Documentary Evidence ii. Documentary Evidence iii. Documentary Evidence	i. COD ii. LS + 3 month iii. LS + 6 months and LS + 3 years
2.	Assessment criteria ECOM will include criteria to ensure that impacts are managed in accordance with IFC Performance Standards and applicable IFC Environmental, Health & Safety Guidelines. ECOM will assign and disseminate to its subsidiaries a Performance Metrics Guideline for ESH&S issues consistent with its existing annual monitoring report requirements (yellow form).	Documentary Evidence	LS + 6 month

3.	Supply Chain (i) ECOM will develop and implement a screening mechanism to identify risk of child labor and forced labor in their supply chain. Corrective actions will be taken using best commercial efforts to address these issues . (ii) ECOM will develop a plan in order to extent their areas of assistance to farmers. The aspects that need to be included are working conditions and environmental aspects. ECOM will base this new approach on the current model they are implementing in Central America for their certified coffee operations in Central America.	(i) Provide screening procedure to IFC for review and comments (ii) Provide IFC with implementation plan for review and comment	LS + 8 months
Labor and working conditions			
4.	Human Resources Policy ECOM will include and implement all requirements under PS2 into their Human Resources Policy. Review consistency of HR policies and procedures of its subsidiaries with ECOM policies.	Provide IFC with HR policy for review and comment	LS+ 3 months
5.	Grievance mechanism (i) ECOM will develop a clear grievance procedure, including steps to be taken, mediation process, responsible persons, and how feedback will be given. (ii) Implement grievance procedure at a corporate level and at each operation.	(i) Present grievance procedure and implementation plan (ii) Documentary Evidence	(i) LS + 6 months (ii) LS + 1 year
6.	Review OH&S Policies and Procedures Comprehensive review of ECOM OH&S Policies and Procedures at all their facilities, and implementation of corrective actions to address gaps identified in the review.	Present plan to IFC for review and comment	LS + 1 year
Pollution prevention and Abatement			
7.	Wastewater Treatment Review wastewater treatment at company owned and operated wet milling facilities against local regulatory standards and applicable WB/IFC guidelines, and in the event of a gap, propose a corrective action plan.	Present plan to IFC for review and comment	LS + 6 months
8.	Phase out of Methyl Bromide and management of Hazardous Chemicals ECOM will present the following: (i) a phase out plan in order to restrict use of Methyl Bromide for applications not included in allowable exceptions under the Montreal	Present plan to IFC for review and comment	LS + 6 months

	(ii) protocol, and a management plan for the safe handling and application of allowable fumigants for all of ECOM's operations globally		
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COD – Condition of Disbursement; LS – Loan signature