

FV Argentina II (27104), Environmental and Social Action Plan – July 24, 2008

Item	Action	Completion Indicator	Timetable
PS1: Social and Environmental Assessment and Management Systems			
1	FV will review its organization to create a corporate environmental, health and safety (EHS) management function.	FV has reviewed the organization of the EHS functions at company level and has created a corporate level EHS function.	By December 2010.
2	FV will develop and implement a system to systematically conduct environmental and social due diligence on all companies targeted for acquisition.	FV has developed a specific procedure and included it in its Environmental Management System. IFC has reviewed and accepted it.	Before the first acquisition.
PS2: Labor and Working Conditions			
3	FV will conduct periodic emergency drills	FV has approved a procedure to conduct periodic drills and conducted the first drill and submitted the relevant documentation to IFC.	By December 2008.
4	FV will review current practice for personal protective equipment (PPE) use and strengthen enforcement.	FV has audited its staff on PPE use and submitted a corrective action plan to IFC.	By December 2008.
5	Based on the results of Action 6 below, FV will study and implement improved exhaust ventilation and extraction of fumes at the melting shop.	a) FV has designed the system upgrade and submitted a workplan to IFC. b) FV has installed the system upgrade.	a) By June 2009. b) By June 2010.
6	FV will conduct an extensive workplace air quality monitoring campaign at several locations of the plants and develop a workplace air quality monitoring plan.	a) FV has conducted the monitoring campaign and submitted the results to IFC. b) Based on the campaign results, FV has prepared the monitoring plan and IFC has reviewed and accepted it.	a) By December 2008. b) By June 2009.
7	FV will conduct a detailed study of the workplace noise to assess measures to reduce the noise emissions and to limit worker's exposure.	FV has conducted the study and developed an action plan to reduce workplace noise. The action plan has been reviewed and accepted by IFC	By December 2009.

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8	FV will review the organization to ensure that the current OHS staff is sufficient to cover for the increased workforce, and will develop an OHS management system consistent with OHSAS 18001 standards.	FV has developed the OHS management system. IFC has reviewed and accepted it.	By December 2009.
9	FV will hire an external qualified consultant, acceptable to IFC, to conduct an occupational safety and fire safety assessment and develop an action plan, as needed. An Occupational Hygiene Risk Exposure Profile (OHREP) will also be prepared.	FV has completed the assessment and finalized the action plan. OHREP have also been developed. IFC has reviewed the assessments and accepted the relevant action plan.	By December 2008.
PS3: Pollution Prevention and Abatement			
10	FV will monitor the presence of toxic metals and oil mist in the emissions of particulate matter, especially from stack 48, and install an abatement system (typically a bag filter system) capable to meet the relevant national and IFC standards.	a) FV has monitored the emissions of particulate matter and submitted the results to IFC. b) FV has designed and installed the abatement system, meeting applicable standards.	a) By December 2008. b) By June 2010.
11	FV will modify the sampling ports at the stacks and ensure that measurements of chromic acid emissions are consistently performed.	FV has modified the ports and completed the first round of measurements.	By December 2008.
12	The electroplating fume abatement systems will be visually inspected quarterly. FV will periodically perform washdowns of the mesh-pad demister.	FV has developed and implemented a specific procedure. IFC has reviewed and accepted the procedure.	By December 2008.
13	FV will review and implement the air emission monitoring plan to ensure compliance verification against IFC guidelines.	a) FV has reviewed the air emission monitoring plan; IFC has reviewed and accepted it. b) FV has implemented the monitoring plan and periodically submitted the results to IFC in the Annual Monitoring Report (AMR).	a) By December 2008. b) By December 2009.

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14	FV will develop an air emission dispersion model in order to define maximum ground concentrations of pollutants of concern, locations of maximum impact and pollutant concentrations at the closest external receptors.	FV has developed the model and submitted the results to IFC.	By March 2009.
15	FV will monitor the efficiency of the new wastewater treatment plant and develop a program to ensure compliance with applicable IFC guidelines for nickel, hexavalent chromium and copper, as needed.	a) FV has monitored effluent concentrations and sludge management at the plant, and submitted the results to IFC. b) An action plan to ensure compliance with IFC guidelines has been developed, as needed.	a) By June 2009. b) By December 2009.
16	FV will develop and implement an action plan to ensure that potentially contaminated stormwater are segregated from clean stormwater and conveyed to treatment.	FV has developed the action plan and IFC has reviewed and accepted it.	By June 2009.
17	FV will ensure that the treated sewage quality complies with both national standards and IFC guidelines.	a) FV has monitored the sewage discharge and submitted the results to IFC. b) FV has installed the new sewage treatment plant and the plant discharge is compliant with national standards and IFC guidelines.	a) By December 2008. b) By December 2010.
18	FV will annually quantify and report direct and indirect GHG emissions, in accordance with internationally recognized methodologies.	FV has reported GHG emissions in its AMR to IFC	According to AMR submittal schedule.