

Environmental and Social Action Plan
May 19, 2009

	Action	Deliverable	Deadline
Social and Environmental (S&E) Assessment and Management Systems			
1.	Implementation of Integrated Management System (i) Develop an implementation plan including actions, timeline and resources required. (ii) Certification of operations (RTRS, OHSAS 18001, ISO 14001, or other equivalent certification to be determined).	(i)	(i) COD (ii) LS + 30months
2.	Contractors and subcontractors (i) THE COMPANY will develop a “Code of Conduct” that outlines environmental, occupational health and safety, labor and working conditions requirements that it requires contractors to meet. (ii) Include “Code of Conduct” in all new contracts provided to contractors. (iii) Develop and implement a monitoring program to ensure that all contractors are in compliance with the defined “Code of Conduct”. (iv) Monitor and report on incidents and accident statistics from all workers working for contractors.	(ii) Submit Code of Conduct to IFC for review and comment. (iii) Code of Conduct part of contracts with contractors. (iv) Submit monitoring program to IFC for review and comment. (v) Submit incident and accident statistics to IFC for review.	(iii) LS + 6 months (iv) LS + 6 months (v) LS + 12 months (vi) LS + 12 months
3.	Community Engagement (i) THE COMPANY will formalize their community engagement process. (ii) Develop and implement a grievance procedure.	Documentary Evidence	COD
Labor and working conditions			
4.	Human Resources Policy (i) THE COMPANY will include provisions on compliance with all requirements of Paraguayan laws and International regulations to which Paraguay is signatory regarding non discrimination, and equal opportunity and freedom of association to their Human Resources Policies.	(i) Submit final version of the updated HR policy to IFC for review and comment. (ii) Provide IFC with evidence that all	(i) COD (ii) LS+ 3 months

	(ii) Distribute updated version in Spanish to all employees. (iii) Train all employees governed by the Policy in updated version contents and the changes made to the previous version.	employees have been trained in HR policy.	
Pollution Prevention and Abatement			
5.	Implementation of Integrated Pest Management (i) Develop an Integrated Pest Management plan. (ii) Present implementation schedule including actions, timeline and resources required. (iii) Implement Integrated Pest Management.	(i) Submit final version of the Integrated Pest Management approach to IFC for review and comment. (ii) Provide IFC with implementation plan. (iii) Submit adequate evidence that the IPM program is fully institutionalized.	(i) LS + 3 months (ii) LS + 6 months (iii) LS+12 months
6.	Hazardous materials Management THE COMPANY will phase out the use of Paraquat and any other pesticide under classes 1a and 1b of the World Health Organization Classification of Pesticide by Hazard.	Present phase-out plan to IFC for review and comment	COD
7.	Emergency Preparedness and Response THE COMPANY has to develop and implement an Emergency Preparedness and Response Plan. Risks addressed by this plan should include transport and vehicle safety, emergency response while handling agrochemicals, and fire safety at offices and plantations (affecting worker health and safety) and spills of diesel and other type of fuel used for transport (affecting surface and groundwater quality).	Documentary Evidence	LS + 9 months
Community Health, Safety and Security			
8.	In the event air spraying is required THE COMPANY will ensure that companies have appropriate procedures and permits to minimize impacts on workers and community health and safety.	Documentary Evidence	LS + 6 months
Biodiversity Conservation and Sustainable Natural Resources Management			
9..	Management and Use of Renewable Natural Resources Obtain Sustainable Soy Roundtable certification to avoid, minimize,	(i) Provide IFC with implementation plan	(i) LS + 6 months (ii) LS + 24 months

	or mitigate impacts and risks of their operations.	(ii)	and schedule; Sustainable Soy Roundtable Certification	
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COD - Condition of Disbursement; LS - Loan signature