

Masan Food (28193)
Environmental and Social Action Plan (ESAP)

	Action	Deliverable	Due Date
Environmental and Social Management System			
1.	EH&S Position at Corporate Level MASAN FOOD will either designate an individual within the organization or hire a new person with responsibility and authority for all environmental, social, health and safety (ESHS), sustainability of anchovy fishery and labor matters at the company. 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. The individual will ensure consistency with good international industry practice for ESHS performance and maintain compliance with all regulatory and IFC requirements, prior to and beyond implementation of a certification regime. (i) Create position and advertise with Terns of Reference; and (ii) Employed/In post	Documentary Evidence - Position creation - Reporting line - Hiring notice	(i) Condition of Disbursement (COD) – First + 60 days (ii)
2.	Certification of Management Systems Masan Food is currently working on achieving the following certifications (i) ISO 9001 for Quality (ii) ISO 14001 for Environmental Management (iii) HACCP (Start Process) (iv) HACCP (Complete Process) (v) ISO 18000 for Occupational Health and Safety	Documentary Evidence - Certification by an Accredited Agency	(i) Dec 31, 2010 (ii) Dec 31, 2010 (iii) Apr 30, 2010 (iv) June 31, 2011 (v) June 31, 2011
3.	Integrated Environmental and Social Management System Masan Food will implement an integrated ESH&S management system to provide continued oversight of ESH&S for all its operations and those of its subcontractors. The management system must ensure consistency with good international industry practice for ESHS performance and maintain compliance with all regulatory and IFC requirements. Specifically, the Management system must include (but not limited to): (i) Screening of business opportunities and service models against IFC Performance Standards (PS 1 through PS 8) and relevant EHS Guidelines. (ii) Integrated OHS functions – training, monitoring, and reporting. (iii) Procurement procedures to provide oversight and contractually require that its suppliers and subcontractors comply with national regulatory requirements and MASAN FOOD's ESH&S policies. (iv) Continual monitoring and reporting of sustainability of anchovy supply as detailed in Action item #9. (v) Procedures for communicating environmental and social aspects to external interested parties, including clear procedures for receiving, documenting and responding to concerns from any external interested parties relating to the project.	Documentary Evidence - Operating Procedure and Policy - Procedures on Community Engagement	Dec 31, 2010

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Labor and Working Conditions			
4.	Retrenchment Plan MASAN FOOD will develop and disclose to its work force its retrenchment plan and the plan to mitigate any adverse impacts of retrenchment on employees. The plan must be developed in documented consultation with employees and/or the union representing them, and in compliance with local regulatory requirements and consistent with requirements of IFC Performance Standard 2 on Labor and Working Conditions. Specific milestones will include: (i) Initiate review and consultation process with affected workforce (ii) Completion of review and management approval of retrenchment plan consistent with objectives described above (iii) Disclosure of retrenchment plan to workforce (and other stakeholders)	Documentary evidence - Consultation records - Management approved retrenchment plan - Disclosure	(i) COD – First (ii) + 90 days (iii) + 100 days
5.	Workplace Safety Review with external assistance MASAN FOOD's OHS policies, procedures and training program for consistency with good international industry practice. Specific milestones are: (i) Retain Consultant (TOR to be developed in consultation with IFC) (ii) Completion of review by consultant and allocation of resources (iii) Begin implementation of recommendations from consultant review.	Documentary evidence (i) Copy of Contract (ii) Consultant Review and Recommendation (iii) Implementation plan with resource (management + fiscal) allocation	(i) COD – First (ii) + 60 days (iii) + 120 days
Pollution Prevention and Abatement			
6.	Discharge of Treated Process and Sanitary Wastewater and Stormwater (i) Performance Guarantee from Supplier/Vendor of Treatment System for TDS at 2% or greater for all MASAN FOOD facilities including operations in Hanoi, Ho Chi and Minh City. - Validation of adequacy of wastewater treatment system to meet consistent compliance with local regulatory requirement and IFC guidelines for the direct discharge of treated wastewater to surface water. Specifically, the wastewater from ALL treatment plants have to meet effluent discharge standards that are better than or equal to: a. BOD and COD of 30 mg/L and 250 mg/L respectively b. Total Nitrogen of 10 mg/L c. Total Phosphorus of 2 mg/L (ii) Storm water management plan (must include plan to mitigate accidental release of product/chemicals on plant property). Specifically: a. Stormwater management plan b. Implementation of identified mitigation measures	Documentary evidence (i) Legally binding Performance Guarantee from Supplier/Vendor, Fiscal Allocation, Training Budget and Equipment Commissioning Date (ii) Stormwater Management Plan	(i) COD – First (ii) + 360 days

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7.	Air Emissions Performance Guarantee from Supplier/Vendor for all MASAN FOOD facilities including operations in Hanoi, and Ho Chi Minh City. Validation of adequacy of process equipment and emission control equipment at ALL facilities to meet or exceed local regulatory and IFC requirements for emissions to the atmosphere. Specifically, emissions from equipment using fuel oil have to meet performance standards that are better than or equal to: - Particulate Matter (PM10) of 50 mg/Nm³. - Sulfur Dioxide (SO₂) of 2000 mg/Nm³. - Nitrogen Oxides (NO_x) of 460 mg/Nm³. - Dry Gas, Excess O₂ Content of 3%. Specific milestones are: - Compliance with local/country regulatory requirements - Compliance with IFC requirements	Documentary evidence - Monitoring data + Permit Requirements; - Action Plan leading up to Legally binding Performance Guarantee from Supplier/Vendor, Fiscal Allocation, Training Budget and Equipment Commissioning Date	- COD – First + 90 days
8.	Water Usage and Energy Efficiency Benchmark MASAN FOOD's water and energy usage against good international industry practice for the sector. Scope of work to be conducted with external assistance with objective to implement economically viable alternative(s) to achieve international best practice. Specific milestones are: - Retain Consultant (TOR to be developed in consultation with IFC) - Completion of review by consultant and allocation of resources - Implementation	Documentary evidence - Copy of Contract - Consultant Review and Recommendations - Implementation plan with resource (management + fiscal) allocation	+ 90 days + 180 days + 360 days
Biodiversity and Conservation			
9.	Certification of Anchovy Supply MASAN FOOD will develop and implement a system to monitor the Phu Quoc anchovy fishery and ensure that it continues to be below the Maximum Sustainable Yield (MSY), which is based on international best practice, and which reviews viability of third party certification options (such as MSC) for the fishery. Specific milestones are: - Management commitment to (a) develop and implement a system to monitor the Phu Quoc anchovy fishery, and (b) if viability of third party certification is demonstrated, commitment to achieve certification within three years from that date. - Retain Consultant (TOR to be developed in consultation with IFC) - Completion of review by consultant - Begin implementation of recommendations and allocation of resources from consultant review.	Documentary evidence - Policy statement endorsed by management. - Copy of Contract - Consultant Review and Recommendations - Implementation plan with resource (management + fiscal) allocation	- COD – First - COD – First + 90 days + 120 days