

Environmental Action Plan
LAPCO – Guatemala - 28558
January 04, 2010

#	Description	Deliverables	Due Date
1	Implement environmental and occupational health and safety management systems. The management system will - Define a systematic approach towards Environmental and Occupational Health and Safety (OHS) aspects, - Quantifying the environmental impacts and OHS risks, - Identify and quantify reduction targets, and - Formalize a monitoring and reporting system for environmental and OHS elements.	Time-bound action plan for the implementation of the management system, based on the initial assessment.	December 2010
		Internal or external audit results showing implementation of the management system consistent with ISO 14001 and OSHAS 18001 equivalent standards.	December 2012
2	Develop a formal waste management system and plan. Such plan should include identification, storage and handling of hazardous and non-hazardous wastes. LAPCO will ensure that wastes are disposed in an adequate manner according to the risk; and that contractors in charge of the disposal follows authorized procedures.	Copy of contractors' authorizations for proper disposal of the materials according to the hazards.	Condition of Disbursement
		Solid waste register and implementation procedures developed.	June 2010
		Solid waste program implemented	December 2010
3	Monitor liquid effluents in the new plant in Escuintla to verify compliance with local and IFC requirements. If shown necessary by the monitoring results or if the company has not moved to the new plant, within 18 months, devise and implement appropriate mitigation measures.	Monitoring report of liquid effluents for industrial and domestic discharges	12 months after disbursement
		Corrective action plan if required by monitoring results or delays in moving into the new plant.	18 months after disbursement
4	Implement OHS programs for the main hazards identified in the plant. This should include but not be limited to a chemical handling program, Lock out Tag out procedures, OHS for contractors, and personal protective equipment. For the current operation in Villa Nueva a qualified team will assess the hazards and implement corrective measures immediately.	Inspection report with a time-bounded action plan for the implementation of the corrective measures for Villa Nueva. Report should be acceptable to IFC.	May 2010
		Defined actions implemented in the Villa Nueva Plant	October 2010
		OHS programs implemented through manuals, procedures and trainings.	June 2011
5	Develop a Chemical Handling program to ensure proper storage, handling, and disposal of chemicals in the plant. The program will ensure at least that: (i) employees are aware of the hazards of the chemicals; (ii) measures are in place to avoid/reduce exposure to chemicals; (iii) risks of the transportation of final product are addressed; and (iv) final residuals are properly handled and disposed.	Chemical Handling program implemented through manuals, procedures, trainings and MSDS.	December 2010
6	Reinforce emergency response procedures, including the update and maintenance of extinguishers and spill response. This will ensure that protection is provided based on the level of risk.	Report of replacement, update or redistribution of fire extinguishers for the Villa Nueva Plant	Condition of Disbursement
		Report of implemented measures in the Escuintla Plant. Updated Emergency response plan.	December 2010
7	Prepare and implement in form and content acceptable to IFC an action plan for the decommissioning of the Villa Nueva plant in a safe and environmentally sound manner.	Plan for the decommissioning of the Villa Nueva acceptable to IFC	June 2010