

Environmental and Social Action Plan (ESAP)
Food Concepts (#29867)

Food Concepts commits to the actions as specified below, within the specified deadlines, and declares that the resources required to implement the action plan will be allocated.

#	Action Description	Indicator of Completion	Timeframe
PS1: Social and Environmental Assessment & Management Systems			
1	Submit copies of all permits and approvals required by the Ogun State Bureau of Urban and Physical Planning prior to construction, including EIA approval letter and permit for land application of wastewater.	(i) Copy of EIA approval letter, and all relevant permits for FRF submitted to IFC.	30 days prior to construction.
2	Appoint a full-time Environment, Occupational Health and Safety officer to assist senior management with Environmental, OHS and food safety development system and implementation and strengthen Food Concepts E&S capacity. This will include monitoring of this ESAP implementation and overseeing Free Range Farms Limited (FRF) EHS. The officer will develop, monitor, and integrate Key Performance Indicators (KPIs) applicable for environmental and EHS performance (improve monitoring of quality and quantity of water, waste water, waste and energy, revise weekly KPI reporting accordingly, put yearly reduction targets per ton product).	(i) Submit CV, ToRs and contract/letter of appointment of the officer to IFC. (ii) Submit new KPI format and monthly measurements to IFC.	Within six months of loan signature for appointment and six months thereafter for KPI development
3	Implement Environmental Management System in compliance with IFC Performance Standard 1, PS1, and in line with ISO 14001 and integrate to Quality management system.	(i) Submit adequate evidence to IFC that system implementation is completed. (ii) Provide copies of accredited Certification Body certificates. (iii) Provide adequate evidence to IFC that all corrective actions are completed.	Within 18 months of loan signature Completion of all corrective actions six months after certification
PS2: Labor & Working Conditions			
4	Implement a companywide Occupational Health and Safety Management System in line with OHSAS18001 and integrate to Quality management system.	(i) Submit adequate evidence to IFC that system implementation is completed. (ii) Provide adequate evidence to IFC that all corrective actions are completed.	Within 18 months of loan signature Completion of all corrective actions six months after certification
5	Include the requirement for a comprehensive environment	(i) Submit a copy of relevant section	Prior to commencement

	health and safety plan, including an indication of how compliance is to be ensured, in tender documentation submitted to construction companies for FRF.	from tender documentation for FRF construction.	of construction at FRF
PS3: Pollution Prevention & Abatement			
6	Prepare Food Concepts Water & Energy consumption reduction program.	(i) Provide evidence to IFC that the program is prepared and implemented.	12 months after loan signature and reviewed one year thereafter to reflect the start of operations at FRF
7	Equip all existing fuel and oil tanks with secondary containments to hold 110% of the tank capacity, and ensure all newly installed tanks are equipped with secondary containment at the time of installation.	(i) Submit installation completion report including photographic evidence to IFC.	18 months from loan signature
8	Upgrade the groundwater study for FRF to include identification of suitable sites for installation of monitoring boreholes, including village water resources. The groundwater potential in the area will be investigated to ensure sustainability of water abstraction such that community and FRF needs can be met. This work will also include preparation of a water balance to fully understand the interaction between ground and surface water resources, together with the FRF and community water needs.	(i) Submit groundwater study with location of village water sources and monitoring points, plus the water balance.	On loan signature
9	Account for and report GHG emissions annually in the AMR. Ensure all new developments do not use appliances with ozone depleting substances e.g. CFC's.	(i) GHG accounted for and reported in first AMR (ii) Record of refrigerants maintained	First AMR due to IFC
10	Phase out use of Brodifacoum, a class Ia rodenticide (extremely hazardous) according to the WHO Recommended Classification of Pesticides by Hazards, and replace it with an acceptable rodenticide such as pyrethrum based compounds that comply with IFC PS3. This will also entail implementing a strong in-house rodent control and eradication program which includes daily inspections, filling up burrows with concrete and rodent proofing buildings at least twice per year, and more often if the situation warrants.	(i) Submit evidence to IFC to demonstrate Brodifacoum phase-out and replacement with other non chemical control measures and/or PS3 compliant compound	Within three months of loan signature
11	Develop and implement an Integrated Pesticide Management Plan (IPM) for the proposed feed cropping activities at FRF in line with IFC guidelines on crop production and WHO pesticide classification system to ensure that pesticides used comply with international requirements.	(i) Submit IPM to IFC for review and comment. The plan will include procedures, appropriate staffing, budgeting, management endorsement, vision and mission statements and associated documentation.	18 months after loan signature and in line with start of crop production at FRF
PS4: Community Health, Safety & Security			
12	Obtain Certification for ISO22000/HACCP. Address any	(i) Submit adequate evidence to IFC that	Within 18 months of loan

	corrective actions that arise from the certification process.	system implementation is completed. (ii) Provide copies of accredited Certification Body certificates. (iii) Provide adequate evidence to IFC that all corrective actions are completed.	signature Completion of all corrective actions six months after certification
13	Develop and implement a system to review, record and monitor incidents and accidents associated with the transportation of Food Concepts supplies and products. This will include regularly training drivers on health & safety, checking drivers' health conditions, maintaining trucks and adhering to national speed limits. The system will cover third parties that may be contracted to transport Food Concepts supplies and products.	(i) Submit recording and monitoring program to IFC for review and comment. Provide copies of procedures. (ii) Drivers' training logs are maintained. (iii) Drivers' medical records are maintained. (iv) Trucks' technical maintenance records are available.	12 months from loan signature.
PS5: Land Acquisition and Involuntary Resettlement			
14	Commission an audit of FRF land acquisition process to date against PS5, with recommendations, if any, that Food Concepts can adopt and implement for its future land acquisitions.	(i) ToR for the audit agreed upon with IFC. (ii) Provide adequate evidence to IFC that all corrective actions are completed.	Within six months of loan signature
15	Formalize existing communication with local communities in a Stakeholder Engagement Plan following the reference "Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets (May 2007)" . As part of the SEP, Food Concepts will prepare a Grievance Mechanism to be disclosed publicly. In addition, Food Concepts will provide regular feedback to local stakeholders (at least annually) on implementation of agreed environmental and social mitigation measures related to impacts that could affect them.	(i) SEP provided to IFC. (ii) Community engagement procedures have been established and made publicly available.	Details of annual feedback process included in first AMR to be submitted to IFC
PS6: Biodiversity Conservation & Sustainable Natural Resource Management			
16	Undertake an ecological baseline survey of the seasonal stream that flows along and forms the western boundary of FRF to reveal the general ecological profile of the stream and its vicinity to facilitate the subsequent impact assessment. In addition to obtaining an inventory of the flora and fauna of the stream, the ecological baseline survey should also aim at providing insight into the ecological functions and	(i) ToR for the ecological baseline survey agreed upon with IFC. (ii) Ecological baseline survey report provided to IFC.	From loan signature and covering a period of 12 months.

	importance of the habitats in and around the stream, if any.		
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