

Bayer Farmers (#30595) - Environmental & Social Action Plan

#	Action	Indicator of Completion	Required Completion Date
	PS1 - Social and Environmental Assessment and Management Systems		
1	<u>Upgrade the social and environmental management system (SEMS) for social and environmental affairs, quality, safety, and occupational health and safety management.</u> Develop a management system encompassing social, occupational health and safety, food safety, and environmental affairs management. The Environmental and Social Management System (ESMS) shall comply with IFC Performance Standard 1 requirements, and conform to Bayer's Global HSE policy requirements	a) Implement the audit and submit to IFC the findings of the Bayer Global HSE audit in Ukraine. Implement further improvement of the local management system based on findings of Bayer Global HSE audits b) Design the SEMS to comply with IFC Performance Standard 1 requirements and conform to Bayer's Global HSE policy requirements. Present a social and environmental management system plan satisfactory to IFC, including management process (summarizing program components, implementing management system procedures, and activities schedule). c) Provide to IFC certification from Bayer senior manager evidencing that the SEMS is operational	a) 6 months after first guarantee is issued b) 9 months after first guarantee is issued, and report on implementation progress in the AMRs c) 12 months after first guarantee is issued
2	<u>Establish Environmental Managerial Responsibilities and Organogramme</u> Establish social and environmental managerial duties, and undertake the activities to implement HSE function at all levels of operations, complying with host country environmental regulatory and WBG EHS guidelines. The HSE manager for local environmental and social issues shall report to Bayer's senior management in Ukraine.	Provide IFC with a copy of the internal memorandum covering responsibilities of the HSE manager for local environmental and social issues, and organogramme showing this position reporting to Bayer Ukraine's senior manager	Before first guarantee is issued
	PS2: Labor and Working Conditions		

3	<u>Health and safety of workers handling pesticides</u> Bayer will provide evidence of the training of employees handling pesticides specifically in the use of adequate Personal Protection Equipment (PPE) based upon MSDS and/or ICSCs, and will fully integrate pest management procedures into the SEMS procedures manual. Bayer will continue monitoring the cholinesterase levels in employees applying pesticides	a) Submit to IFC for review the list of training program for employees, and evidence that adequate PPE has been provided to workers based upon MSDS and/or ICSCs for the materials used, and fully integrate procedures into management system procedures manual b) Provide to IFC the protocol for cholinesterase testing, and the policy for pest application workers rotation to avoid chronic exposures to specific pesticides, and fully integrate procedures into management system procedures manual c) Provide in the AMR the report of the monitoring of cholinesterase levels in workers applying pesticides	a) 6 months after first guarantee is issued b) 3 months after first guarantee is issued c) Report in Annual Monitoring Report (AMR)
PS3: Pollution Prevention and Abatement			
4	<u>Product safety and prevention of potential pollution due to accidental leakage throughout transportation and storage</u> Bayer will revise the HSE requirements for contractors (transport companies, warehouses) and distributors; incorporate requirements into the documents, where applicable, including availability of MSDSs for distributors and regular audits of distributors facilities	Present to IFC the revised HSE requirements for contractors (transport companies, warehouses) and distributors; incorporate requirements into the documents, where applicable, including availability of MSDSs for distributors and regular audits of distributors facilities	9 months after first guarantee is issued, and report on implementation progress in the AMRs
5	<u>WHO Ia/Ib pesticide chemical formulations:</u> As part of the SEMS, Bayer Ukraine will provide to IFC a policy statement committing to no distribution of WHO Class Ia/Ib chemical formulations in Ukraine	Provide a copy of the policy committing to no distribution of WHO Ia/Ib pesticide chemical formulations to the Ukrainian market, satisfactory to IFC, and evidence that Bayer Ukraine has adopted the policy and placed it in its SEMS	Before first guarantee is issued

6	<u>Formulate an integrated pest/disease management (IPM/IDM) program for pest management activities fully applying the requirements of IFC Performance Standard 3</u> Bayer Ukraine will identify ways to promote the use of Integrated Pest/Disease Control Programs amongst its clients by developing and implementing integrated pest/disease management programs, making use of the Company's own technical team or through the involvement of Bayer's international/local advisers in entomology/plant pathology. The IPM/IDM Programs shall include crop management practices, insect/disease monitoring, pest/disease ecology, biological control, and other control components, and, as a last resort, pesticide chemical formulations to avoid unacceptable economical levels of pest or disease damage. If a pesticide chemical formulation is also required as part of the IPM, then this IPM component will aim to carry a less significant weight than the other components of the IPM/IDM program. Bayer will ensure compliance with the Food and Agriculture Organization's International Code of Conduct on the Distribution and Use of Pesticides, or to other good industry practice	a) Documentation (booklets, presentations, etc.) prepared by Bayer with information on IPM/IDM programs and supporting documents of diffusion mechanism implemented by Bayer. b) Conduct an independent review on the promotion and training on IPM/IDM programs and report to IFC c) Report to IFC on adherence to the Food and Agriculture Organization's International Code of Conduct on the Distribution and Use of Pesticides, or to other good industry practice	a) 6 months after first guarantee is issued b) and c) Report on implementation progress in the AMRs
7	<u>Handling of hazardous materials</u> Bayer will implement practical training (through current communication channels) for farmers and end users to minimize adverse impacts due to project activities on soil, water, and other natural resources in use by communities. This will include among others: a) Appropriate and safe pesticide storage, and handling in the field b) Safe disposal of empty containers and residuals	Present to IFC the training materials for appropriate and safe handling and disposal of pesticides	Before second guarantee is issued