

DAP (#31308) - Environmental and Social Action Plan
November 11, 2011

	Action	Deliverable	Deadline
PS1. Social and Environmental (S&E) Assessment and Management Systems			
1.	RTRS Certification Achieve certification of all farm operations	Evidence of certification	September 2012
2.	Training Develop and implement OHS training program for own employees and subcontractors	(i) Evidence of scope and schedule for implementation of training program (ii) Evidence for implementation	(i) COD (ii) Together with next AMR report
3.	Monitoring (i) Complete systematic analysis of E&S monitoring indicators to be included in the Company's E&S monitoring program and complement current monitoring program as needed (ii) Monitor and report on incidents and accident statistics from all workers working for contractors (iii) Conduct regular occupational health and safety (OHS) audits of own and subcontracted operations (against regulatory and IFC requirements) and implement time-bound action plans of any identified gaps	(i) Revised list of E&S monitoring indicators for IFC review (ii) Incident and accident statistics to IFC for review (iii) Evidence of audit program scope, schedule, and audit results	(i) COD (ii) Together with next AMR report (iii) Audit program scope and schedule (COD). Evidence of Implementation together with next AMR report
4.	Community Engagement Develop and implement a grievance procedure	Documentary evidence of (i) development and (ii) implementation of grievance procedure	(i) COD (ii) Together with next AMR report
PS2. Labor and working conditions			
5.	OHS Management Conduct exit medical exams when workers end employment with the Company	(i) Defined medical monitoring procedure (ii) Evidence of implementation	(i) COD (ii) Together with next AMR report
PS3. Pollution Prevention and Abatement			

6.	Waste Management Develop and implement a waste management procedure for the storage and disposal of empty agrochemical containers that includes restricted access to a covered storage area and a chain-of-custody procedure to ensure its final, safe, destruction and disposal. Periodically audit contractors' container disposal operations.	(i) Defined procedure in place (ii) Evidence of implementation	(i) COD (ii) Together with next AMR report
7.	Emergency Preparedness and Response Complement the corporate emergency preparedness and response procedure with farm specific procedures posted in a visible locations	Documentary evidence	Together with AMR report
PS4. Community Health, Safety and Security			
8.	Security Personnel Requirements Conduct an independent audit of the security arrangements in order to evaluate compliance with IFC's requirements on the use of security personnel and implement the necessary corrective actions from the findings of such audit, if any.	(i) Evidence of signed contract with independent expert acceptable to IFC (ii) Evidence of implementation of findings	(i) 3 months after loan signing (ii) Together with AMR report
PS6. Biodiversity Conservation and Sustainable Natural Resources Management			
9..	Management and Use of Renewable Natural Resources In the event the Company's future growth plans include a change in policy on the conversion of natural habitat or development of farming operations in the Chaco Region of Paraguay, the Company will notify IFC of its intentions and will develop and implement a detailed procedure on the selection of new farm locations and assessment, prevention, and mitigation of impacts to biodiversity in accordance with IFC PS1 and PS6 requirements.	(i) Revised policy and procedure for selection and acquisition / leasing of new farms meeting IFC requirements (ii) Evidence of implementation	(i) 3 months prior to intended implementation schedule (ii) Prior to new acquisitions / leasing

COD - Condition of Disbursement