

SIPRA (#31422) - ENVIRONMENTAL AND SOCIAL ACTION PLAN

	Action Item	Deliverable	Deadline
Performance Standard 1: Social and Environmental Assessment and Management Systems			
1	SIPRA will design and implement an Environmental and Social Management System (ESMS) – consistent with ISO 14001, OHSAS 18001 and HACCP/ISO 22001 - to be reviewed and approved by IFC, defining roles and responsibilities, and other necessary elements (manual procedures) to enable it to comply with Ivorian laws and regulations, IFC Performance Standards and applicable WBG's Environmental, Health and Safety Guidelines. The ESMS will include mechanisms for the EHS officer to report monthly E&S monitoring results to SIPRA's senior management who will need to sign off on the reports.	a) ESMS design in place and approved by IFC b) Evidence of complete implementation (e.g. draft documentation of the ESMS, including solid waste management, plans, manual procedures and programs, e.g. training logs, monitoring records, minutes of progress reviews).	a) May 2013 b) May 2014 c) Report on implementation status, on an annual basis, in the Annual Monitoring Report
2	Ivoire Poussins and Coqivoire will obtain certification for HACCP and ISO 22000, and Ivograin will obtain certification for ISO 22000 and will address any corrective actions that arise from the certification process.	a) Submit adequate evidence to IFC that system implementation is completed; b) Provide copies of accredited certification body certificates c) Provide adequate evidence to IFC that all corrective actions are completed	a) May 2013 b) December 2013 c) May 2014
3	SIPRA will appoint a qualified EHS officer who will be responsible for implementing the ESMS and fulfilling the ESAP conditions. This officer will report to SIPRA's Managing Director.	a) Provide the Terms of Reference, C.V. and contract of the EHS officer for IFC review	a) January 2013
4	SIPRA will prepare and implement a training program for all its employees and contractors which will encompass all the key issues identified in the above mentioned ESMS, with a specific emphasis on the Integrated EHS Management system, including resource efficiency, OHS, Life and Fire Safety and Emergency Preparedness and Response Plans.	a) Provide a copy of the management system procedure and supporting training plan and materials on E&S issues for all stakeholders. b) Report annually in the AMR	a) January 2013 b) On an annual basis, in the AMR
5	SIPRA will monitor and report the implementation and results of the relevant E&S management programs and activities identified in the ESMP to senior management.	a) Provide to IFC the management system procedure for monitoring and reporting on E&S issues, including the format of the external and internal report	b) May 2013 and report annually in the Annual Monitoring Report (AMR)
6	SIPRA will formalize the development of its Stakeholder Engagement Plan	a) Provide IFC with the draft of the Stakeholder Engagement Plan	a) January 2013 b) Report on implementation, on an annual basis, in the AMR
Performance Standard 2: Labour and Working Conditions			

7	SIPRA review and update its corporate Human Resource Policy and labor contracting specifications in compliance with labor laws and regulations in Ivory Coast and all the requirements defined in IFC's Performance Standard 2. Specifically, this policy will include references to freedom of association and collective bargaining, prohibition of child and forced labor, grievance mechanisms, etc.	a) Provide the revised Human Resource policy and labor contracting specifications for IFC review and approval. b) Provide adequate evidence of HR policy and procedures incorporation into management systems, the disclosure process to employees and full implementation.	a) January 2013 b) May 2013
8	SIPRA will develop and implement a corporate Employee Grievance Mechanism, including steps to be taken, mediation process, assigned responsible persons, publicize the procedure, response time, record keeping, and how feedback will be given. The Employee Grievance Mechanism will be disseminated to employees as part of the induction process and will be posted on SIPRA's internal website	a) Provide the Employee Grievance Mechanism procedures for IFC review and approval b) Confirmation of the dissemination of the mechanism to all employees, including inclusion in the HR policy and procedures, Induction Booklet and SIPRA's website.	a) May 2013 b) December 2013
9	SIPRA will undertake a gap analysis of its OHS policy and procedures at all its facilities against applicable WBG EHS general and sector specific guidelines. On the basis of this review, it will prepare a management systems procedure on OHS, including action plan detailing corrective measures (training, PPE, assignment of responsibilities, recommendations from the CHSCT and the CNPS, etc.), implementation schedule and budgetary resources for effective and timely implementation. In addition, SIPRA will integrate OHS sections in contracts in order to ensure that contractors' and sub-contractors' employees are in compliance with all the requirements described in SIPRA's OHS Policy and IFC's Performance Standard 2. SIPRA will also develop and provide service contracting firms with a manual that includes OHS requirements of SIPRA and will include reference to such requirements in the service contract documents.	a) Present to IFC the OHS gap analysis, the OHS management system procedure, including action plan and implementation schedule; b) Provide detailed evidence of OHS procedure implementation, through certification from SIPRA's managing director that all deficiencies identified in the gap analysis have effectively addressed; c) OHS manual for contracting firms, in form and content acceptable to IFC. d) Evidence of integrating the OHS requirements into contract and continuous monitoring.	a) January 2013 b) May 2013 c) May 2013 and report annually in the AMR. d) May 2013 and report annually in the AMR
10	Life and Fire Safety. SIPRA will develop and implement a management system procedure and an action plan for fire prevention, detection and alarm system in all its facilities. Emergency lightning, exit signs, mean of egress will be improved.	a) Submit evidence to IFC of the L&FS management procedure and action plan, including timetable for its implementation.	a) January 2013

	Recommendations of the CHSCT and CNPS will need to be effectively mainstreamed into the action plan. SIPRA will recruit an independent fire consultant to perform a Life and Fire Safety Audit of all SIPRA facilities against the Ivoirian life safety code SIPRA will have regular L&FS training and drills according to the emergency preparedness plan	b) Submit audit results to IFC and provide implementation timetable of audit's recommendations. Provide certificate of conformity c) Emergency preparedness plan and records of regular trainings and drills are maintained	b) After the proposed expansion project is completed. c) May 2013 and report annually in the AMR
11	SIPRA will present the preparedness plan and response for avian influenza, including a mitigation plan.	SIPRA will develop and implement a management system procedure for the avian influenza preparedness and response, including a training plan to ensure that employees are knowledgeable of the preparedness plan for avian influenza and emergency contingency plans. The plan will include: (i) preparedness and prevention, (ii) outbreak response, and (iii) recovery	January 2013
	Performance Standard 3: Pollution Prevention and Abatement		
12	Based on the cleaner production audit and the implementation of the recommendations, SIPRA will design and construct a Waste Water Treatment unit for its slaughtering processing unit (CoqIvoire) in compliance with Ivorian and applicable WBG's effluents guidelines, especially for pH, BOD, COD, total suspended Solids, Grease, total nitrogen and total phosphorus.	a) Submit engineering design and procurement details documents to IFC; b) Submit completion certificates and photo evidence to IFC c) Report on wastewater monitoring program, including all parameters within WBG's effluents guidelines	a) May 2013 b) December 2014 c) December 2014 and report annually in the AMR
13	SIPRA will re-establish a comprehensive chemical, physical and micro-biological assessment of groundwater in all wells and establish a quality, consumption and a resource efficiency baseline. If there is any water quality deterioration, SIPRA will take specific action to mitigate the situation.	a) Provide to IFC the comprehensive physico-chemical & microbiological assessment of groundwater in all wells for its operations and associated farms and establish a baseline; b) Report annual assessment of groundwater	a) January 2013 b) Report annually in the AMR
14	In order to prevent leakage to public sewage system at CoqIvoire facility, SIPRA will build a sedimentation tank to prevent leakage	a) Photographs of the sedimentation tanks and retaining walls.	a) 3 months after first disbursement

	of diesel. In addition, all fuel tanks at the SIPRA facilities should have fuel tank retaining walls and impermeable floors underneath to hold 110% of the volume of the tanks. Retaining walls should allow for the removal of rain water without leaking oily water.		
15	SIPRA will implement an energy management plan for all its operations. In order to support development of this plan, SIPRA will systematically collect key energy indicators, including electricity and diesel quantities used during the year, reductions from previous years, activities (energy audit) undertaken to reduce energy use and efforts to motivate employees, etc.	a) Present the Energy Management Plan for IFC review b) Demonstrate to IFC ongoing activities to collect data and prepare reports on key energy indicators, including electricity and energy consumptions, cleaner production audits, etc.	a) May 2013 b) Report annually in the AMR
16	SIPRA will conduct air emissions measurements for all its boilers and gensets, and compare parameters with WBG General EHS Guidelines for ambient air concentrations (particulate matter limit (PM10) of 50mg/Nm ³ ; NO _x of 460 mg/Nm ³ ; SO _x of 2000 mg/Nm ³ , and submit a report to IFC. If measurements exceed WBG limits, SIPRA will propose corrective measures, and a schedule to bring all emissions into compliance with WBG limits.	a) Provide air measurements results b) If measurements exceed WBG limits, SIPRA will propose corrective measures and a schedule to bring all emissions into compliance with WBG air emissions limits, including timetable.	a) January 2013 b) May 2013 and report annually in the AMR
17	SIPRA will develop and implement a Pest and Rodent management system procedure. The procedure will aim to eliminate the use of WHO Class 1a and 1b chemical formulations in its facilities. SIPRA will modify service contracts to require service providers mandatory training of its workers and adequate PPE based upon MSDS and/or ICSCs for the materials used.	a) Provide copy of the procedure to IFC and adequate documentary evidence of incorporation into management system procedures manuals, including the training plan giving contractors' employees	a) January 2013 b) Report annually in the AMR
	PS4: Community Health, Safety and Security		
18	SIPRA will develop and implement a vehicle Operator Safety Training Program for its drivers and contractors emphasizing the following: safety aspects among drivers, improving driver skills, licensing of drivers, limits for trip duration, duty roster to avoid overtiredness, avoiding dangerous routes and times of day to reduce the risks of accidents, use of speed control devices on vehicles; and, remote monitoring of driver actions, behavior and performance and overall truck maintenance	a) Provide IFC with documented evidence of the training program; b) Demonstrate full implementation	a) May 2013 b) May 2013
19	SIPRA will conduct studies to confirm that drug residues in poultry products meet the maximum residue limits (MRLs) recommended by WHO and FAO; and will undertake corrective actions, if needed, to comply with MRLs.	a) Report on compliance with MRLs, including corrective action plan	a) January 2013 and report annually therefore in the AMR
20	SIPRA will develop and implement emergency preparedness and response plans for its facilities. Emergency plans will respond to	Documented plans and procedures in form and content acceptable to IFC	January 2013

	the needs of life and fire safety requirements and include training on emergency evacuation, use of fire equipment, and other applicable aspects identified by experienced emergency planning specialists in the planning process.		
21	SIPRA will develop and implement a community engagement procedure to be included into the ESMS, including a mechanism for receiving, addressing and resolving community grievances and complaints during the operational phase at all facilities. The content of this procedure shall be guided by IFC's Good Practice Note on Stakeholder Engagement.	a) Submit copy of the procedure for IFC review and approval; b) Provide evidence of dissemination of the procedure in relevant public communication at each facility.	a) January 2013 b) Report annually in the AMR on treatment of the complaints received.