

NATURE 31815 E&S ACTION PLAN FOR PUBLIC DISCLOSURE WITH ESRS: FINAL

Ref	Action	Status (Ongoing, Complete, Cancelled)	Timeline
1	Occupational Health and Safety Peru operations: engage a competent professional to conduct an OHS assessment of Nature-owned companies and primary suppliers. Based on OHS review develop action plan, schedule and budget to implement OHS improvements		End February 2013
2	Occupational Health and Safety Accident investigation: review existing procedure to ensure that evaluation of preventative actions is sufficiently rigorous (e.g. trend analysis to establish if a common root cause triggers a variety of different incidents).		First AMR post first disbursement
3	Occupational Health and Safety Review indoor air quality data at sites where diesel forklifts used for transportation and determine if WBG guideline limits are being exceeded. Where so, develop action plan, schedule and budget to implement improvements e.g. introduction of electric forklifts.		First AMR post first disbursement
4	Occupational Health and Safety Undertake workplace risk assessment (by function/activity).		First AMR post first disbursement

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5	Land Acquisition - Applicable to existing Yunnan assets and all future asset acquisitions: i. Documented records verifying that non-middlemen land use rights holders (i.e. villagers to whom the village collective assigned land use rights) have been paid by Nature at prevailing market rates for land and above-ground assets. ii. Documents retained for each land transaction verifying that Defined Principles (refer to PS1) have been followed.		Yunnan assets: end November 2012 Future assets: Documented records (i)-(ii) available for review by IFC before a land transaction is finalized
6	Natural and Plantation Forests - EXISTING I. FSC-FM pre-assessment of Ninglang and Yingjiang assets by an accredited Certification Body, including assessment of land acquisition practices against PS5 requirements. II. FSC-FM or equivalent certification for Ninglang, Yunnan III. FSC-FM or equivalent certification for Yingjiang, Yunnan FUTURE ASSETS • FSC-FM or equivalent certification date for any other forestry assets to be acquired in the future (with date not to exceed 36 months from date of Nature taking management control of the asset).		I. End November 2012 II. Target date to be finalized by end of November 2012 III. As per II
7	Natural and Plantation Forests • Nature America Concession: Close all outstanding FSC nonconformities (inventory, cutting cycle, off-take sales) and retain FSC-FM or equivalent • Maderera Rio Yaverija: develop plan to assist MA to meet projected sourcing targets (100%) and assess impact of ADECOM loss of FSC on supply chain		Action plan, satisfactory to IFC: end October 2012

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8	Management and Use of Renewal Natural Resources I. Owned facilities using 100% wood of legally-verifiable origin legal (VLO equivalent or better). Original target was end 2011 II. Existing AMs targets: 100% legal (VLO equivalent or better) by end 2014 III. New AMs (for doors, cabinets): 100% legal (VLO equivalent or better) by end 2016 IV. Elimination of high risk (CITES Appendix II listed) species from the supply chain unless from sources with FSC-COC capacity and labeled accordingly. V. Existing target for FSC or equivalent certified: 20%. Target was 20% by 2010		I. Revised target: end of 2012 II. End of 2014 III. New target: end of 2016 IV. End October 2012 V. Revised target: end of 2018
9	Management and Use of Renewal Natural Resources Assurance Processes – timber sourcing (China). Plan (with supporting timeline, budget and responsibilities) to migrate to an internationally recognized standard such as ‘Verified Legal Origin’ (VLO) or FSC Controlled Wood.		Plan (satisfactory to IFC): first Annual Monitoring Report (AMR) post first disbursement.
10	Management and Use of Renewal Natural Resources Assurance Processes • Conduct Annual FSC COC audits for all owned operations and AMs • Develop and institutionalize standardized FSC COC system which facilitates real-time traceability of wood flows between all Nature operations (including primary suppliers).		• First AMR post first disbursement • First AMR post first disbursement

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11	Management and Use of Renewal Natural Resources Organizational Capacity: establishment of an internal FSC management unit headed by a qualified professional with relevant experience, to oversee FSC or equivalent processes and provide in-house capability and capacity to units with operational management responsibility for the particular FSC certification.		First AMR post first disbursement
12	Indigenous Peoples i. Assessment done by external qualified consultant acceptable to IFC, of the forest and forest resource related customs, practices, and norms of local ethnic minorities residing near Ninglang and Yingjiang plantations. ii. Assessment results incorporated into SEP and grievance mechanism. iii. Where the assessment finds adverse impacts by the project on local ethnic minority groups, take actions to minimize impacts, after free, prior and informed consultation with local ethnic communities.		i. End November 2012 ii. End December 2012 iii. End January 2013