

Environmental and Social Action Plan (ESAP), CBH, # 32653, January 2013

	Action Item	Deadline
PS1: Assessment and Management of Environmental and Social Risks and Impacts		
1	<p>CBH will develop and consolidate its existing management systems into an integrated ESMS in compliance with IFC's PS1 requirements and applicable WBG General and Sector-Specific EHS Guidelines. Specifically, CBH will ensure that;</p> <ul style="list-style-type: none"> (i) Oistins chicken processing plant obtains certification for HACCP and ISO 22000; (ii) the feed mill plants in Botswana and Zambia are upgraded and certified to the same standard as the plants in South Africa. <p>The ESMS will include mechanisms for the EHS officer to report monthly E&S monitoring results to CBH's senior management who will need to sign off on the reports. CBH will provide copies of accredited certification body certificates to IFC, as well as evidence of ESMS implementation.</p>	By June 2014, and report on implementation status, on an annual basis, in the Sustainability Report
2	CBH will appoint qualified EHS officers who will be responsible for implementing the ESMS and fulfilling the ESAP conditions. These officers will report to CBH's Chief Financial Officer. CBH will provide the Terms of Reference, C.V. and contracts of the EHS officers for IFC review.	By June 2013
3	<p>CBH will consolidate its existing training programs into a comprehensive training manual for the group.</p> <ul style="list-style-type: none"> (i) the manual will include comprehensive training needs assessment linked to a robust schedule to deliver the identified programs. (ii) the manual will enhance the development and implementation of the integrated management system in 2) above. <p>CBH will provide a copy of the training manual to IFC for review, and report on training programs delivered annually in its Sustainability and Governance Report.</p>	By June 2014 and report on training delivered on an annual basis in the Sustainability Report
4	CBH will update its existing Stakeholder Engagement Plan to include local communities. The updated plan, which will be submitted to IFC for review, will include a formal system to deal with external queries, concerns, and grievances. CBH will also include a summary of community grievances, if any, received in the year in the Sustainability and Governance Report.	By June 2014, and ongoing in Sustainability Report for summary
PS2: Labor and Working Conditions		
5	CBH will engage a suitably qualified consultant, acceptable to IFC, to undertake a comprehensive Occupational Health and Safety audit based on OHSAS 18001 for the feed mill in Zambia. The resulting report, which will include a corrective action plan to address deficiencies identified and corresponding recommendations specified in the analysis, will be shared with IFC. In addition, certification of correction of deficiencies will be provided to IFC.	By July 2013 for analysis report, and by December 2013 for completion of implementation of corrective actions

6	CBH will engage a suitably qualified consultant to undertake a complete and detailed analysis of the LFS systems at the feed mill in Zambia against both Zambian and LFS standard (as referenced in the General EHS Guidelines). The consultant will also review the emergency response plan to evaluate its completeness for the feed mill. Confirmation from the consultant on existence and adequacy of emergency response plan for the facility will be provided to IFC.	By December 2013 for analysis report, and by June 2014 for completion of corrective actions and confirmation of adequacy of the emergency response plan
PS3: Resource Efficiency and Pollution Prevention		
7	CBH will commission the installation of flow meters at sites that currently do not have flow meters to measure water usage at these sites. CBH will continue to report its consumption against source, i.e. surface and groundwater, annually in its Sustainability Report.	Annually in the Sustainability Report
8	CBH will commission an energy audit for Ross Zambia and Ross Botswana with the view to implement an energy management plan to improve efficiency, through data collection, energy consumption/management reports and reduction targets. The resulting energy audit report, which will include opportunities for significant energy savings and implementation plan for the identified energy saving initiatives, will be submitted to IFC for review.	By March 2012, and report energy savings annually in the Sustainability Report
9	CBH will account and report its GHG emissions on an annual basis in the Sustainability Report.	Annually
10	CBH will commission an expert engineering consultancy firm to design and construct a wastewater treatment facility at Oistins chicken processing plant, in Francistown. The wastewater treatment facility should be designed and operated to achieve all effluents parameters found in Table 1 of the WBG EHS Guidelines for poultry processing. CBH will submit the engineering designs, completion certificates and photo evidence to IFC, and report on wastewater monitoring program in the Sustainability and Governance Report, including all parameters within WBG's effluents guidelines.	By June 2013 for design, by December 2013 for commissioning, and report effluent water analysis results annually in the Sustainability Report
11	CBH 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. The report, which will include a corrective action plan to address exceedance, if any, identified and corresponding recommendations specified to bring all emissions into compliance with WBG air emissions limits, will be shared with IFC.	By June 2014, and report annually in the Sustainability Report
12	CBH will prepare a management system procedure for pest and rodent management. The procedure will aim to eliminate the use of WHO Class 1a and 1b chemical formulations in its premises. CBH will modify service contracts to require contractors and suppliers for mandatory training to workers and adequate PPE based upon MSDS and/or ICSCs for the materials used. This resulting procedure will be submitted to IFC.	By June 2014, and report annually in the Sustainability Report