

Agrofertil Expansion Capex – PARAGUAY Environmental and Social Action Plan

No.	Aspect	Action	Deliverable	Delivery date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Comprehensive Management System	Design and implement a Comprehensive Environmental, Social, and Health and Safety Management System (CMS). The CMS shall comply with the requirements of IFC Performance Standard 1 and incorporate, as specific plans or procedures, all plans required by the environmental, social, or health and safety enforcement authorities.	1. Evidence of documented commitment to design and implement the CMS.	Prior to First Disbursement.
1.2	Environmental, Social, and Health and Safety Management Division	Create the Environmental, Social, and Health and Safety Management Division of the CMS and appoint a professional to lead its implementation and update.	1. Creation of the Environmental, Social, and Health and Safety Management Division. 2. Designation of the CMS lead.	2 months after the first disbursement.
1.3	Project Environmental, Social, and Health and Safety Policy	Incorporate Agrofertil's Environmental, Social, and Health and Safety Management Policy into the CMS, in line with the International Finance Corporation's Performance Standards applicable to the loan operation.	1. Environmental, Social, and Health and Safety Policy. 2. Proof of incorporation into the CMS.	1. 3 months after the first disbursement. 2. 7 months after the first disbursement.
1.4	Environmental, Social, and Health and Safety Management Program	By means of an Environmental, Social, and Health and Safety Management Program, set annual objectives and target values for certain key parameters and indicators, as well as the actions, responsibilities, and deadlines for achieving these goals and objectives.	1. Preparation of the Program. 2. Proof of implementation.	1. 3 months after the first disbursement. 2. 7 months after the first disbursement.
1.5	Identification of environmental and social aspects, occupational risks, and legal aspects	Develop independently, and incorporate into the CMS, the following matrices: 1. Matrix for the identification and evaluation of environmental and social aspects; 2. Matrix for the identification and evaluation of occupational risks; 3. Matrix for the identification and evaluation of legal aspects.	1. Matrix for the identification and evaluation of environmental and social aspects. 2. Matrix for the identification and evaluation of occupational risks. 3. Matrix for the identification and evaluation of legal aspects.	6 months after the first disbursement.
1.6	Management procedures	Develop and incorporate into the CMS operational procedures to comply with the environmental, social, and occupational health requirements of Paraguayan legislation and the requirements of the company's contracts with financing entities.	1. CMS Operating Procedures. 2. Proof of adoption.	1. 4 months after the first disbursement. 2. 8 months after the first disbursement.

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1.7	Training	As part of the CMS, prepare and implement an annual Environmental, Social, and Health and Safety Training Plan.	<ol style="list-style-type: none"> 1. First Semi-Annual Training Plan. 2. Proof of implementation. 	<ol style="list-style-type: none"> 1. 4 months after the first disbursement. 2. 8 months after the first disbursement.
1.8	Documentation management	Prepare and implement a documentation management procedure to prepare, approve, distribute, conserve, control, and update all CMS documents.	<ol style="list-style-type: none"> 1. Documentation Management procedure. 2. Proof of implementation. 	<ol style="list-style-type: none"> 1. 4 months after the first disbursement. 2. 8 months after the first disbursement.
1.9	Emergency Management	Develop and implement an Emergency Prevention and Response Plan for each administrative and operational site, based on site-specific emergency scenarios.	<ol style="list-style-type: none"> 1. Emergency Prevention and Response Plans. 2. Proof of implementation. 	<ol style="list-style-type: none"> 1. 4 months after the first disbursement. 2. 8 months after the first disbursement.
		For each administrative headquarters or operational unit that has been the subject of an Emergency Prevention and Response Plan, carry out an emergency drill at least once a year.	Drill reports	With each environmental and social compliance report.
1.10	Accident Management	Develop and implement a specific Accident Management procedure applicable to own personnel and that engaged by third parties, whose content ensures compliance with legal requirements.	<ol style="list-style-type: none"> 1. Accident Management procedure. 2. Proof of implementation. 	<ol style="list-style-type: none"> 1. 4 months after the first disbursement. 2. 8 months after the first disbursement.
1.11	Goods and Services Supplier Management	Develop and implement a Goods and Services Supplier Regulation. Said Regulation shall be specially prepared for each supplier, according to the nature and scope of its activity. For suppliers with contracts in force prior to the loan contract, Agrofertil will provide a copy of the Goods and Services Supplier Regulations and will require a written commitment to comply with them from each supplier. For new contracts, the Regulations shall be an exhibit to each contract. In both cases, the Regulations shall be binding.	<ol style="list-style-type: none"> 1. Goods and Services Supplier Regulation. 2. Proof of implementation. 	<ol style="list-style-type: none"> 1. 4 months after the first disbursement. 2. 8 months after the first disbursement.
1.12	Environmental, Social, and Health and Safety Monitoring	Develop and implement an Environmental, Social, and Health and Safety Monitoring Plan pursuant to the IFC Performance Standards. The Plan shall be acceptable to IDB Invest.	<ol style="list-style-type: none"> 1. Environmental, Social, and Health and Safety Monitoring Plan. 2. Proof of implementation. 	<ol style="list-style-type: none"> 1. 4 months after the first disbursement. 2. 8 months after the first disbursement.
1.13	Review and corrective action	Develop templates for the environmental, social, and health and safety monitoring of administrative facilities, silos, and production units and for the implementation and follow-up of the corresponding preventive/corrective actions.	<ol style="list-style-type: none"> 1. Monitoring templates and implementation and follow-up templates for preventive/corrective actions. 2. Proof of adoption. 	<ol style="list-style-type: none"> 1. 4 months after the first disbursement. 2. 8 months after the first disbursement.

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1.14	Third-party grievance reception and resolution	Develop and implement a mechanism for receiving and resolving third-party grievances, including the possibility of capturing complaints or grievances anonymously. The mechanism will clearly set out the assignment of responsibilities and the deadlines for evaluating and responding to the submissions made.	<ol style="list-style-type: none"> Mechanism for receiving and resolving grievances. Proof of implementation. 	<ol style="list-style-type: none"> 4 months after the first disbursement. 8 months after the first disbursement.
PS 2: Labor and Working Conditions				
2.1	Human Resources Policies	Develop and implement a Human Resources Policy for the Project, applicable to in-house staff and workers engaged by third parties.	<ol style="list-style-type: none"> Human Resources Policy for the Project. Proof of implementation. 	<ol style="list-style-type: none"> 4 months after the first disbursement. 8 months after the first disbursement.
2.2	Women's participation	Promote and monitor women's participation in the workforce.	Report on women's participation in the workforce.	With each environmental and social compliance report.
2.3	Internal mechanism for receiving and resolving grievances and complaints	Develop and implement a mechanism for receiving and resolving complaints and grievances from own personnel and that engaged by third parties, that includes the possibility of registering anonymous complaints or grievances, defines those responsible for handling them, and determines the deadlines for evaluating and responding to personnel complaints. This mechanism shall include, in a specific section, the management of sexual harassment complaints.	<ol style="list-style-type: none"> Internal mechanism for receiving and resolving complaints. Proof of implementation. 	<ol style="list-style-type: none"> 4 months after the first disbursement. 8 months after the first disbursement.
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Resource Efficiency	Generate records on the monthly consumption of water, electricity, fuel for vehicles and machinery, firewood from native species, and the amount and destination of waste generated or recycled. Establish and implement the necessary actions to comply with the goals and objectives proposed in the Environmental, Social, and Health and Safety Management Program.	Consumption and recycled waste records	With each environmental and social compliance report.
3.2	Greenhouse Gases	<ol style="list-style-type: none"> Submit GHG estimates for the following year. Submit the calculation of the previous year's emissions. 	<ol style="list-style-type: none"> GHG emission estimates for the following year GHG emission calculation for the previous year 	With each environmental and social compliance report.
3.3	Waste Management	Develop and implement a waste management procedure that includes record keeping forms to quantify and record the amount and type of waste generated in administrative facilities, silos and production facilities.	<ol style="list-style-type: none"> Waste Management procedure. Proof of implementation. 	<ol style="list-style-type: none"> 4 months after the first disbursement. 8 months after the first disbursement

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3.4	Hazardous Materials Management	Develop and implement a procedure for the management (purchase, transport, storage, and handling) of hazardous substances that includes the express prohibition of the purchase and use of pesticides or chemical substances that include any Class Ia (extremely hazardous) or Ib (highly hazardous) component according to the WHO classification.	<ol style="list-style-type: none"> Hazardous substances management procedure. Proof of implementation. 	<ol style="list-style-type: none"> 4 months after the first disbursement. 8 months after the first disbursement.
PS 4: Community Health, Safety, and Security				
4.1		<p>Develop a stakeholder map, including stakeholders in administrative facilities, silos, and production fields. Fulfill the requirements of PS-4, including differentiated measures to enable effective community and neighbor participation and a method for sharing information with identified stakeholders.</p> <p>Implement the Stakeholder Relationship Plan.</p>	<ol style="list-style-type: none"> Stakeholder Mapping and Stakeholder Engagement Plan. Proof of implementation 	<ol style="list-style-type: none"> 4 months after the first disbursement. 8 months after the first disbursement.
PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources				
6.1	Supply Chain	Record and evaluate the findings associated with GFW application for stockpile supply chain monitoring.	Records and evaluation.	With each environmental and social compliance report.
6.2	Impacts on native flora	Record the consumption of firewood from native species in silo dryers. Progressive substitution with eucalyptus wood to reach the defined annual goal.	Records of the consumption of firewood from native species.	With each environmental and social compliance report.