

Agrícola Cerro Prieto  
Environmental and Social Action Plan

No.	Frame of reference / Aspect	Action	Deliverable	Delivery date
<b>General</b>				
<b>PS 1: Assessment and Management of Environmental and Social Risks and Impacts<sup>1</sup></b>				
1.1	Environmental and Social Management System	Operations in Colombia: complete the preparation of an ESMS, based on the parent company's ESMS, which assesses the specific context of operations in Colombia and includes the necessary measures to address the specific issues present in the national context.	ESMS for Cerro Prieto Colombia.	12 months after signing the contract.
1.2	Cumulative Impact	Operations in Colombia: ACP will conduct a cumulative impact assessment to rule out the possibility that its operations will exacerbate negative environmental and social impacts in the area.	Cumulative Impact Assessment according to the IFC Guidelines <sup>2</sup> .	12 months after signing the contract.
1.3	Gender	Operations in Peru and Colombia: a. Sign the statement of support for the Women's Empowerment Principles. b. Complete the WEP gender equality measurement tool.	a. Proof of statement signature. b. WEP Tool Results.	6 months after signing the contract.
1.4	Climate Change Exposure	Operations in Colombia: ACP will conduct a climate change risk assessment and, based on the results, will establish and implement the corresponding adaptation and mitigation measures.	Climate change risk assessment and related adaptation and mitigation measures.	6 months after signing the contract.
1.5	Emergency Preparedness and Response	Operations in Peru: include in the emergency and contingency plan a fire prevention plan in line with NFPA standards and actions to perform in case of ammonia leakage in the refrigeration system.  Operations in Colombia: prepare an Emergency Preparedness and Response Plan in line with legal requirements and those of the IFC's PS1 and PS4.	Peru: Updated emergency and contingency plan including a fire prevention plan and actions in case of ammonia leakage.  Colombia: Emergency Response Plan.	6 months after signing the contract.  6 months after signing the contract.

<sup>1</sup> [https://www.ifc.org/wps/wcm/connect/topics\\_ext\\_content/ifc\\_external\\_corporate\\_site/sustainability-at-ifc/publications/publications\\_handbook\\_esms-general](https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_handbook_esms-general)

<sup>2</sup> [https://www.ifc.org/wps/wcm/connect/93910f82-9040-47a3-ba27-4571555701cb/IFC\\_CIA\\_Esp.pdf?MOD=AJPERES&CVID=kTkDp0w](https://www.ifc.org/wps/wcm/connect/93910f82-9040-47a3-ba27-4571555701cb/IFC_CIA_Esp.pdf?MOD=AJPERES&CVID=kTkDp0w)

1.6	Stakeholder Engagement	Mapping of social stakeholders in Colombia.	Stakeholder mapping.	6 months after signing the contract in Colombia followed by an annual update in both countries.
1.7	Disclosure of Information	Operations in Colombia: disclose information to neighboring communities about agricultural expansions, regarding: the scale of the project, duration of activities, potential risks or impacts and mitigation measures, the planned stakeholder participation process, and the grievance mechanism.	Proof of access to information available to neighboring communities related to agricultural expansion.	Before starting any expansion.
1.8	Indigenous Peoples (IP)	Operation in Colombia: a. Conduct a social and environmental risk and impact assessment of all indigenous communities that may be affected by the project. b. Prepare a map identifying all affected IPs.	a. E&S risk and impact assessment for IP. b. Prepare a map identifying all affected IPs.	a. and b. 6 months after signing the contract.
1.9	External Communication and Grievance Mechanisms	The Colombia operation must implement: a. A procedure for external communications with the Project's stakeholders, including IPs, which is sensitive to the socio-cultural characteristics of these communities. b. A grievance and complaints mechanism that is culturally appropriate to the characteristics of the stakeholders in the Project's area of influence. In both countries: c. Formalize a process for receiving gender-based violence and sexual harassment complaints. It must be anonymous, protect the victim's identity, and be informed to all employees.	a. Stakeholder external communications procedure approved for use. b. Mechanisms for handling grievances and complaints approved for use. c. Process for receiving gender-based violence and sexual harassment complaints.	6 months after signing the contract.
<b>PS 2: Labor and Working Conditions</b>				
2.1	Working Conditions and Management of Worker Relationships	Operation in Peru: a. Update the procedure for managing on-site camps and prepare written procedures for managing off-site camps to stay in line with the IFC <sup>3</sup> and EBRD Guidelines for Worker Accommodation Processes and Standards. b. Improve water supply conditions for human consumption at all sites that require it, to prevent the tanks from heating up and ensure that they are accessible to all workers on the farm.	a. Updated procedures approved for use and evidence of implementation. b. Evidence of improvements in water supply (photographic record, on-site interview with workers).	6 months after signing the contract.

<sup>3</sup> [https://www.ifc.org/wps/wcm/connect/7bb5464e-61aa-4919-baef-d5589a95b9d6/Influx\\_Full.pdf?MOD=AJPERES&CVID=nrOWC11](https://www.ifc.org/wps/wcm/connect/7bb5464e-61aa-4919-baef-d5589a95b9d6/Influx_Full.pdf?MOD=AJPERES&CVID=nrOWC11)  
[https://www.ifc.org/wps/wcm/connect/4be146fd-ea2c-4abc-97a3-f480df197fe0/Influx\\_Part5.pdf?MOD=AJPERES&CVID=nrOWDOI](https://www.ifc.org/wps/wcm/connect/4be146fd-ea2c-4abc-97a3-f480df197fe0/Influx_Part5.pdf?MOD=AJPERES&CVID=nrOWDOI)

		<p>Operation in Colombia:</p> <ol style="list-style-type: none"> <li>Implement human resources policies and procedures aligned to PS2 requirements.</li> <li>Institute a human rights policy that establishes the freedom of workers to form unions.</li> <li>Establish a policy of non-discrimination and equal opportunities.</li> <li>Implement a grievance mechanism for workers, contractors and the supply chain.</li> <li>Establish a policy prohibiting child and forced labor in its facilities and supply chain.</li> </ol>	<p>Operation in Colombia:</p> <ol style="list-style-type: none"> <li>Human resources policies and procedures approved for use.</li> <li>Human rights policy.</li> <li>Non-discrimination and equal opportunities policy.</li> <li>Grievance mechanism for workers approved for use.</li> <li>Policy prohibiting child and forced labor in its facilities and supply chain.</li> </ol> <p>All policies will be approved for use and dissemination to workers will be evidenced.</p>	6 months after signing the contract.
2.2	Occupational Health and Safety <sup>4</sup>	<ol style="list-style-type: none"> <li>Develop safe work procedures for the critical/high-risk hazards identified in the IPER matrix, as well as for the handling of loads and tools, and carry out inductions on how to apply the procedures.</li> <li>Prepare work instructions for avocado harvesting to reduce the risks of accidents due to falling avocados and falling to different levels caused by the unsafe use of ladders (without a lifeline).</li> <li>In the packaging area, implement measures to prevent and protect workers from occupational noise.</li> <li>Implement a worker shuttle service provider contracting policy in line with the guidelines set out in the WBG General Guidelines and the Good Practice Note on Road Safety.</li> <li>Conduct biannual occupational noise measurements and comply with national regulations and WBG General Guidelines standards.</li> <li>The Colombia operation will implement an OHS management system in line with PS2 requirements.</li> </ol>	<ol style="list-style-type: none"> <li>Approved procedure for the use and recording of completed inductions.</li> <li>Approved work instructions for the use and recording of inductions.</li> <li>Induction log on preventive measures and evidence of implementation of corrective measures.</li> <li>Log of training and inspections carried out.</li> <li>Biannual occupational noise monitoring report</li> <li>OSHMS implemented in line with PS2 requirements.</li> </ol>	<ol style="list-style-type: none"> <li>b. c. d. and f. 6 months after signing the contract.</li> <li>Annual</li> </ol>

<sup>4</sup> <https://www.ifc.org/wps/wcm/connect/1d19c1ab-3ef8-42d4-bd6b-cb79648af3fe/2%2BOccupational%2BHealth%2BAnd%2BSafety.pdf?MOD=AJPERES&CVID=ls62x8l>

2.3	Provisions for People with Disabilities	Peru and Colombia ACP will prepare a human resources strategy to attract and retain people with disabilities in accordance with the domestic legislation in force and the IDB's Sustainability Policy, setting goals for recruitment and adaptation of spaces in order to increase the number of workers with disabilities.	Peru and Colombia Human Resources Strategy for People with Disabilities.	12 months after signing the contract.
2.4	Workers Engaged by Third Parties	Operation in Colombia: implement procedures to manage the environmental, social and OHS aspects of contractors.	Procedures approved and implemented.	6 months after signing the contract.
<b>PS 3: Resource Efficiency and Pollution Prevention</b>				
3.1	Greenhouse Gases	Operations in Peru and Colombia must quantify and report GHG emissions.	GHG Report.	Annual
3.2	Water Consumption	<ul style="list-style-type: none"> <li>a. Obtain the water licenses for Qali 3 from the ANA in the name of the company.</li> <li>b. Obtain the water license for Qali 4 from the ANA in the name of the company.</li> <li>c. Keep surface/groundwater licenses and permits for all operations in Peru and Colombia updated.</li> </ul>	<ul style="list-style-type: none"> <li>a. Water license for Qali 3.</li> <li>b. Water license for Qali 4.</li> <li>c. Well authorization and licensing certifications.</li> </ul>	<ul style="list-style-type: none"> <li>a. 3 months after signing the contract.</li> <li>b. Before making operational use of water resources in Qali 4.</li> <li>c. Continuous</li> </ul>
3.3	Pollution Prevention	<p>Operation in Peru:</p> <ul style="list-style-type: none"> <li>a. Ensure that septic tanks are well-maintained to prevent the proliferation of vectors and that 100% of domestic effluents are disposed of in a timely manner by the Solid Waste Operator (SWO) to avoid risk of soil and groundwater pollution.</li> <li>b. Collect and treat industrial effluents and dispose of them separately from domestic effluents.</li> <li>c. Conduct biannual monitoring of domestic and industrial effluents, comparing them to the reference limits set out in domestic regulations and the guideline values of the WBG General Guidelines.</li> </ul> <p>Operation in Colombia: Implement as part of its monitoring and follow-up program the biannual measurement of surface water quality, groundwater (if applicable), domestic and industrial wastewater, air quality and environmental noise. Monitoring results will be compared with</p>	<ul style="list-style-type: none"> <li>a. Tank maintenance record, septic tank statistical record, storage volumes, suction frequencies and final disposal. SWO receipts.</li> <li>b. Report of identification of industrial wastewater generation and collection, treatment and final disposal system and permits and authorizations for discharges of treated wastewater.</li> <li>c. Biannual wastewater monitoring reports.</li> </ul> <p>Biannual environmental monitoring reports.</p>	<ul style="list-style-type: none"> <li>a. b. and c. 6 months after signing the contract.</li> </ul> <p>Annual</p>

		the limits established in the local regulation and the guideline values of the WB General Environmental, Health and Safety Guidelines.		
3.4	Waste	<p>a. Update the General Plan for Hazardous and Non-Hazardous Solid Waste, including legal requirements regarding temporary and central storage areas for solid waste, storage procedures, collection, transport and final disposal. In addition to the environmental education, composting and recycling programs that ACP carries out.</p> <p>b. Develop guidelines for the use of alternative measures to weed burning as an agricultural practice.</p>	<p>a. General Plan for Hazardous and Non-Hazardous Solid Waste updated.</p> <p>b. Organic waste management manual, specifically for weeds, specifying the timeline for implementing alternative waste management measures, the internal prohibition of weed burning and its communication campaign.</p>	<p>a. 3 months after signing the contract.</p> <p>b. 6 months after signing the contract.</p>
3.5	Hazardous Materials Management	<p>Operations in Peru and Colombia:</p> <p>a. Develop and implement a procedure for the transport, handling, storage, use and disposal of hazardous materials and their packaging. Train staff in the procedure's implementation.</p> <p>b. Peru: Conduct a safety assessment of refrigeration systems and compare the results with applicable international standards, such as those of the International Institute of Refrigeration with Ammonia (IIRA).</p>	<p>a. Procedure approved for use, staff training record, training material.</p> <p>b. Safety assessment of ammonia refrigeration systems.</p> <p>Procedure approved for use, staff training record, training material.</p>	6 months after signing the contract.
3.6	Pesticide Use and Management	<p>Operation in Peru: update agrochemical management documents according to the guidelines of the International Code of Conduct on the Distribution and Use of Pesticides of the Food and Agriculture Organization of the United Nations.</p> <p>Operation in Colombia:</p> <p>a. <u>1b</u> agrochemical phase-out commitment according to WHO within a period of no more than three (3) years.</p> <p>b. Adopt an Integrated Pest/Disease Management (IPM) Manual and a Good Agricultural Practices (GAP) Manual, which will include a ban on the use of <u>1a</u> and <u>1b</u> agrochemicals.</p>	<p>a. Updated management documents.</p> <p>b. Staff training log.</p> <p>a. <u>1b</u> Agrochemical Phase-out Commitment Letter, including the phase-out schedule.</p> <p>b. IPM and GAP Manuals.</p> <p>c. Staff training log.</p>	<p>6 months after signing the contract.</p> <p>a. Prior to First Disbursement.</p> <p>b. 1 year after signing the contract.</p> <p>c. 1 year after signing the contract.</p>

<b>PS 4: Community Health, Safety, and Security</b> <sup>5</sup>				
4.1	Infrastructure and Equipment Design and Safety	Update transportation contractor management documents with the guidelines outlined in the WBG General Guidelines.	Management documents updated and induction log completed.	3 months after signing the contract.
4.2	Ecosystem Services	Operation in Colombia: conduct an assessment to rule out the presence of ecosystem services affected by Project activities. If a potential impact is identified, a management plan validated together with the affected community must be implemented.	Assessment report and management plan validated with the community completed.	6 months after signing the contract.
4.3	Hazardous Materials Management and Safety	Ensure that transporters of hazardous materials (ammonia and liquid and gaseous fuels) comply with national regulations governing the transport of hazardous materials and have contingency plans in place and risk maps according to the types of substances.	Inspection logs and audits of hazardous materials transporters.	6 months after signing the contract.
4.4	Community Exposure to Disease	Develop community health procedures for seasonal workers to prevent COVID-19 transmission in accordance with IDB Invest's COVID-19 Guidance for the Agricultural Sector.	Management documents updated and induction log completed.	3 months after signing the contract.
4.5	Emergency Preparedness and Response	Operation in Colombia: rule out the presence of communities affected by the operations; if such effects are identified, adjust the Emergency Preparedness and Response Plan to PS4 requirements.	Evaluation report.	6 months after signing the contract.
4.6	Security Personnel	Operation in Colombia: conduct human rights training for security personnel and establish guidelines on the use of force and the use of weapons in line with PS4 requirements. <sup>6</sup>	Completed training log. Physical safety management guidelines.	6 months after signing the contract.
<b>PS 5: Land Acquisition and Involuntary Resettlement</b>				
5.1	Land Acquisition	<p>a. Develop and implement a Land Selection and Acquisition Manual for new plantations or plants containing:</p> <ul style="list-style-type: none"> <li>• <b>An involuntary resettlement procedure</b> that, to the largest possible extent, avoids physical or economic displacement of persons using such land or, where unavoidable, anticipates and minimizes adverse social and economic impacts arising from such land acquisition or restriction on land use, by: (i) compensating the loss of property at replacement cost; (ii) ensuring that resettlement activities are carried out with proper information disclosure, consultation and informed participation of the affected persons; and (iii) improving or restoring the</li> </ul>	<p>a. Land Selection and Acquisition Manual</p> <ul style="list-style-type: none"> <li>• Involuntary resettlement procedure</li> <li>• Biodiversity impact prevention procedure</li> <li>• Prevention of impacts on indigenous people procedure</li> </ul>	<p>a. 3 months after signing the contract or before the first acquisition after signing the contract, whichever happens first.</p> <p>b. 1 month before commencing the exploitation of the acquired land.</p> <p>c. 1 month after the date of the new procurement contract.</p>

<sup>5</sup> <https://www.ifc.org/wps/wcm/connect/eeb82b4a-e9a8-4ad1-9472-f1c766eb67c8/3%2BCommunity%2BHealth%2Band%2BSafety.pdf?MOD=AJPERES&CVID=ls62Gai>

<sup>6</sup> [https://www.ifc.org/wps/wcm/connect/5e74e4d6-f977-49f3-85cb-e626519b0e49/p\\_handbook\\_SecurityForces\\_2017\\_Spanish.pdf?MOD=AJPERES&CVID=IYhviUt](https://www.ifc.org/wps/wcm/connect/5e74e4d6-f977-49f3-85cb-e626519b0e49/p_handbook_SecurityForces_2017_Spanish.pdf?MOD=AJPERES&CVID=IYhviUt)  
[https://media.business-humanrights.org/media/documents/files/documents/Gu%C3%ADa\\_ICMM-CICR-IFC-IPIECA\\_VPSHR.pdf](https://media.business-humanrights.org/media/documents/files/documents/Gu%C3%ADa_ICMM-CICR-IFC-IPIECA_VPSHR.pdf)

		<p>livelihoods and living standards of the displaced persons.</p> <ul style="list-style-type: none"> <li>• A <b>biodiversity impact prevention procedure</b> that considers alternative construction options if critical habitats, legally protected areas, or areas internationally recognized as such exist.</li> <li>• A <b>prevention of impacts on indigenous people procedure</b>. A report on the consultation and participation process must be submitted prior to the start of the works, as well as a letter of consent from the authorities or legitimate representatives of the indigenous peoples if there are indigenous communities on the land where plantations or plants are to be established, in addition to complying with indigenous peoples' rights and corresponding legislation.</li> <li>• A <b>conservation of cultural heritage procedure</b>. If the impact identification process determines that there is a potential risk to cultural heritage, in addition to complying with corresponding legislation on the protection of such cultural heritage, the procedure must (i) establish measures to minimize the impacts and risks to cultural heritage caused by the location of the new works; (ii) hire competent professionals to collaborate in the identification and protection of cultural heritage; and (iii) have a Chance Finds Procedure in place.</li> </ul> <p>b. Conditions subsequent to the acquisition of land:</p> <ul style="list-style-type: none"> <li>- Conduct community consultation processes, informing the population of the type of operation planned and the community communication mechanism, receiving relevant comments to implement the required solutions.</li> <li>- Obtain the necessary permits and authorizations for the exploitation of the land in accordance with the Environmental Management Regulations for the Agricultural Sector, including the respective Environmental Compliance and Management Programs (or PAMA, for their Spanish acronym).</li> <li>- Obtain water use licenses and implement the respective programs to guarantee the rational use of water.</li> <li>- Establish environmental, social and labor management plans following ACP's ESMS.</li> </ul> <p>c. Report information on new land acquisitions with regard to the aspects contained in the Land Selection and Acquisition Manual.</p>	<ul style="list-style-type: none"> <li>• Conservation of cultural heritage procedure</li> </ul> <p>b. Post-acquisition</p> <ul style="list-style-type: none"> <li>• Community Consultation Test</li> <li>• Land use permits and authorizations</li> <li>• Water use licenses</li> <li>• Management Plans</li> </ul> <p>c. Land purchase process report.</p>	
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<b>PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources <sup>7</sup></b>				
6.1.	Biodiversity	<p>Operation in Peru:</p> <ol style="list-style-type: none"> <li>Update the biodiversity assessment and conduct a critical habitat analysis of the Project area in accordance with PS6.</li> <li>If a critical habitat is identified, implement a Biodiversity Action Plan (BAP).</li> </ol> <p>Operation in Colombia: conduct a field assessment of flora and fauna in two wet and dry seasons in order to determine the presence of biodiversity and its community parameters. Based on these results, carry out a critical habitat analysis in accordance with PS6.. If a critical habitat is identified, a Biodiversity Action Plan (BAP) will be implemented.</p>	<ol style="list-style-type: none"> <li>Biodiversity monitoring results and critical habitat analysis results.</li> <li>Plan implementation.</li> </ol> <p>Biodiversity monitoring results and critical habitat analysis results. Plan implementation.</p>	<ol style="list-style-type: none"> <li>3 months after signing the contract.</li> <li>In accordance with the provisions of the plan.</li> </ol>
<b>PS 7: Indigenous Peoples</b>				
7.1.	PS 7: Indigenous Peoples	<p>Operation in Colombia: conduct an assessment to rule out impact on indigenous communities in accordance with PS7 guidelines. If affected, an Action Plan will be established with specific measures to prevent and mitigate potential risks and impacts.</p>	Report on the evaluation of the impact on indigenous communities.	6 months after signing the contract.
<b>PS 8: Cultural Heritage</b>				
8.1.	Chance Find	<p>Operation in Peru: Develop a Cultural Heritage Management Plan (CHMP) that includes the following components:</p> <ul style="list-style-type: none"> <li>- Monitoring program;</li> <li>- Chance Find Procedures (CFP);</li> <li>- Site protection program; and</li> <li>- Cultural Heritage Training Program.</li> </ul> <p>Operation in Colombia: Develop a Chance Find Procedure and conduct cultural heritage training.</p>	<ol style="list-style-type: none"> <li>Cultural Heritage Management Plan in Peru</li> <li>Chance Find Procedure in Colombia</li> <li>Induction log for workers in both countries.</li> </ol>	6 months after signing the contract.

<sup>7</sup> [https://www.ifc.org/wps/wcm/connect/9fc3aaef-14c3-4489-acf1-a1c43d7f86ec/GN\\_English\\_2012\\_Full-Documents\\_updated\\_June-14-2021.pdf?MOD=AJPERES&CVID=nF3GZYM](https://www.ifc.org/wps/wcm/connect/9fc3aaef-14c3-4489-acf1-a1c43d7f86ec/GN_English_2012_Full-Documents_updated_June-14-2021.pdf?MOD=AJPERES&CVID=nF3GZYM)