

Environmental and Social Action Plan (ESAP)

Task Title/Description	Anticipated Completion Date	Indicator of Completion
<p>Policy: The overarching Corporate Policy statement will be strengthened to align with the 2012 Performance Standards.</p>	<p>Loan signature + 3 months</p>	<p>ESHS Policy Updated and communicated to all staff, main contractors and suppliers.</p>
<p>Identification of Risks and Impacts: Pampa Baja will update its corporate risk management process to: (a) Review its risk assessment whenever there is a change in processes, technology, activities or an expansion; (b) Improve identification of risks and impacts of its operations to communities on a periodic basis, and c) develop procedures to implement a preventive management plan to avoid/minimize floods of crop fields, resulting from climate events such as the 2017 Niño Costero in Olmos</p>	<p>a) and b) Loan signature + 12 months c) Loan signature + 12 months</p>	<p>a) Risk assessment process reviewed b) Upgraded risk management procedure addressing communities c) Procedures and management plan to avoid/minimize flood of crop fields</p>
<p>Management Programs: Pampa Baja shall: a) Develop management system procedures to improve environmental and social risk management and performance; b) Establish management system procedures for community engagement including a community grievance mechanism; c) Establish management procedures for supply chain management; d) Develop management system procedures for integrated pest and disease management; e) Develop management system procedures for a Code of Conduct for the security personnel at the company facilities and communities, and manage each identified risk in alignment with the Voluntary Principles (VPs) on Security Forces and Human Rights</p>	<p>a) Loan signature + 6 months b) Loan signature + 12 months c) Loan signature + 12 months d) Loan signature + 12 months e) Loan signature + 12 months</p>	<p>a) Procedures and action plans to minimize environmental and social problems b) Procedures for community engagement c) Procedure for supply chain management d) Procedure for integrated pest and disease management e) Procedure for Code of Conduct for the security personnel in alignment with the Voluntary Principles (VPs) on Security Forces and Human Rights</p>

<p>Organization Capacity and Competency: Pampa Baja will establish an independent Environmental and Social management unit.</p>	<p>a) Loan signature + 6 months</p>	<p>a) present to IDB INVEST a copy of the internal memorandum that establishes Pampa Baja's independent Environmental and Social Management Unit or Department and the appointment of a qualified Corporate Social and Environmental resource person responsible for managing the Corporate Environmental Management Unit.</p>
<p>Emergency Preparedness and Response: Update its corporate emergency preparedness and response management system procedures to: a) Account for emergency planning to involve communities; b) Regular review of the training programs for Emergency Preparedness and Response; c) Review its emergency response procedures whenever there is a change in processes, technology, activities, or an expansion.</p>	<p>a) through d) Loan signature + 12 months</p>	<p>a) Response procedures for external emergency management b) Procedure for the review of training program c) Procedure to update emergency response d) Evidence of implementation of plan in Olmos</p>
<p>Stakeholder Engagement: The company will develop a corporate management system procedure for communication with external stakeholders.</p>	<p>a) and b) Loan signature + 6 months</p>	<p>a) Procedure for communication with external stakeholders b) Website updated with name of Pampa Baja contact person and information on accessing grievance mechanism</p>
<p>Monitoring and Review: Pampa Baja will: a) Establish a corporate management system for monitoring results and use these in risk assessment; b) Develop a management system</p>	<p>a) and b) Loan signature + 6 months</p>	<p>a) Procedure for formal documentation of monitoring results</p>

procedure to report monitoring results in senior management meetings to determine whether the ESMS is effective and supports the policies		b) Procedure to report monitoring results in management meetings
PS 1 ESMS Compliant: a) The company is required to demonstrate a 2012 PS1 compliant Corporate Environmental and Social Management System (ESMS).	a) Loan signature + 24 months	a) Procedures manual for the ESMS b) PS1 ESMS Compliant
Employee Corporate Grievance Mechanism (GM): Pampa Baja will: a) Revise the Corporate GM procedure to ensure that worker grievances can be presented anonymously; and, b) Records will be maintained on actions taken by Pampa Baja and feedback provided.	a) Loan signature + 3 months	a) Present to IDB Invest copy of updated Corporate GM procedure b) Records of all GM incidents reported in annually to IDB INVEST
Occupational Health and Safety: At the Corporate level, in Olmos and Majes, the company will: a) perform an OHS gap analysis to update and fully implement OHS Management System Procedures, and training to enforce use of PPE to employees and contractors. This should identify potential costs to the company for liability insurance and compensation payouts for accidents, lost time accidents; fatalities and other preventable accidents including fires, materials spills, transport, project potential reductions in insurance premiums, etc.	a) and b) Loan signature + 9 months	a) Results of OHS gap analysis b) Submit a final report to IDB Invest and include a certification from the Pampa Baja task manager that all observed deficiencies have been corrected; c) OHS statistics reported annually to IDB Invest.
Field hydration of Workers: The company will develop new corporate management system procedures that will command daily hydration with quality water for each worker. At Olmos and Majes, the company will implement Hydration Stations with quality potable water and ensure always availability of quality drinking water. The Hydration Stations will be located in the field in a way that as workers move, water shall be available within short distances	a) Loan signature + 3 months b) Loan signature + 6 months	a) Corporate management system procedure for field hydration of workers b) Documentary and photographic evidence of implementing Hydration Stations

<p>Potable Water at all Facilities in Office Compound at Olmos: The company will ensure that filtered potable water is provided in all facilities in the office compound at Olmos</p>	<p>a) Loan signature + 6 months</p>	<p>Initial water analysis, and each year reported annually to IDB Invest</p>
<p>Ammonia Safety Management at Majes: Pampa Baja will: a) conduct a safety assessment of ammonia refrigerating systems at Majes, and compare results against applicable international standards such as those of the International Institute of Ammonia Refrigeration – IIAR; b) will address gaps and develop a plan to be implemented for any required modifications to ensure ammonia safety and management to comply with country regulatory limits, WBG General EHS guidelines and IIAR; c) will implement the ammonia leakage emergency preparedness and response plan and communicate this to their employees, including training, scheduled mock drills, and a proactive regularly communication plan to all employees; d) Submit a final report to IDB Invest and include a certification from the Pampa Baja task manager that all observed deficiencies have been corrected</p>	<p>a) Loan signature + 6 months b) Loan signature + 9 months c) Loan signature + 9 months d) Loan signature + 12 months</p>	<p>a) Present safety Assessment based on IIAR b) Plan for implementation of corrective actions c) Ammonia leakage emergency preparedness, training plan for employees and communication plan d) Final report to IDB Invest certified by Pampa Baja task manager</p>
<p>Workers Accommodations: At Majes and Olmos, all worker’s accommodations, if built, shall be in compliance with PS2 requirements and with the IFC Guidance on Worker Accommodation.</p>	<p>a) Loan signature + 9 months</p>	<p>a) Construction design layout in compliance with IFC Guidance on Worker Accommodation b) Documentary and photographic evidence of implementing workers accommodations</p>
<p>Corporate Resource Efficiency: The company will develop and implement a Corporate management system procedure to demonstrate a plan for on-going efforts at Olmos and Majes, in reducing energy and water use, and provide reduction targets, and awareness</p>	<p>a) Loan signature + 9 months b) 60 days after end of the fiscal year</p>	<p>a) Baseline 2018 and plan for water and energy reduction b) Annual Report to IDB INVEST with section showing progress towards targets for</p>

<p>programs with employees to reduce consumption. Baseline will be year 2018</p>		<p>water and energy resource efficiency</p>
<p>Irrigation Water and future Expansion at Olmos: This will require the presentation of a technically-based water resources management plan to IDB Invest.</p>	<p>a) Condition of Disbursement b) Report progressively as wells are being drilled and capacity tests are performed</p>	<p>a) The water resources management plan should include: i) cropping plan and timeline indicating when crops will be at full production; ii) predicted water consumption for the cropping plan and supporting technologies; iii) a projected water supply balance indicating the progressive availability of water (surface, groundwater) to meet corresponding cropping plan at full production; and, iv) contingency plans for obtaining additional water as necessary. b) Pampa Baja will present to IDB Invest: i) copies of ANA licenses for all surface and groundwater to be used; and ii) results of well tests conducted for each well.</p>
<p>GHG emissions: Pampa Baja will implement a Management System procedure for Emissions Inventory of Greenhouse Gases to be reported annually to IDB INVEST.</p>	<p>a) Loan signature + 9 months</p>	<p>a) Procedure for Emissions Inventory of Greenhouse Gases b) Report annually to IDB INVEST using the GHG 2018 as</p>

<p>This will include quantifying emissions from dairy livestock at Majes. Baseline will be year 2018</p>		<p>baseline and show GHG footprint annually</p>
<p>Pesticide Management: Pampa Baja shall a) eliminate the use of WHO Class 1a/1b pesticides; b) provide adequate PPE based upon MSDS and/or ICSCs for the materials used; c) present to IDB INVEST documentary evidence of the training of employees handling pesticides specifically in the use of adequate Personal Protection Equipment (PPE) based upon MSDS and/or ICSCs; d) will continuously monitor the cholinesterase levels in workers applying pesticides</p>	<p>a) Loan signature + 18 months b) Loan signature + 3 months</p>	<p>a) WHO Class 1a/1b chemical formulations eliminated b) Report on PPE use based on MSDS and/or ICSCs pesticide hazard c) Annual Report to IDB INVEST with documentary evidence of the training of employees handling pesticides d) Annual Report to IDB INVEST with annual cholinesterase report</p>
<p>Integrated Pest and Disease Management (IPDM): Implement a Corporate Integrated Pest and Disease Management (IPDM) system to reach compliance with IDB Invest Sustainability Policy and the Performance Standards</p>	<p>a) Loan signature + 12 months b) 60 days after end of the fiscal year</p>	<p>a) Once developed, IPDM management system procedures integrated into the Pampa Baja Corporate ESMS Procedures Manual; b) Each year in the Annual Report to IDB Invest, if suppliers engaged, report on IPDM program implemented at any contracted grower/supplier operations.</p>
<p>Community Health, Safety and Security: Pampa Baja will expand its management system Corporate procedures and training to ensure transport minimizes community health and safety risks, including accident prevention measures, such as appropriate speed limits and safe driving practices</p>	<p>Loan signature + 9 months</p>	<p>Corporate management system procedure for safe transport communicated to all staff, contractors, suppliers. And updated in the Pampa Baja Website</p>
<p>Corporate Community Grievance Mechanism: The company will: a) Develop, operationalize, ensure training for all staff, and publicize a Corporate Community Grievance Mechanism (GM)</p>	<p>a) Loan signature + 12 months b) 60 days after end of the fiscal year</p>	<p>a) Corporate Community Grievance Mechanism implemented. b) Report GM events in the Annual</p>

<p>at Olmos and Majes. The GM shall be designed to receive, accept, analyze and respond to complaints from the general public regarding its operations and transport operations. The implemented mechanism shall include public external communication to public for dissemination of the grievance mechanism and how individuals may register grievances publicly or anonymously with the company, brought to the attention of senior management, and resolved; b) Any event will be recorded in the Annual Report to IDB INVEST</p>		<p>Report to IDB INVEST</p>
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