

## 5. Environmental and Social Action Plan

ID	Action	Deliverable	Deadline
1	Start execution of Firefighting System project at the three industrial facilities to fulfill requirements of Performance Standard 2, related with Emergency Preparedness and Response. All the project need to follow ABNT norms and the engineer in charge to be CREA Certified.	Report of project implementation, every two months.	Before closing
2	Develop and implement an Integrated E&S Management System, following PS1 requirements and according with ISO 14001 & OHSAS 18001 norms, to be applicable in both the agricultural areas and industrial facilities. The integrated policy has to have commitments must be in compliance with PS1 requirements including designation of the individual who will be responsible.	Internal approval of the Integrated E&S Management System. To report progress implementation periodically.	Half year reports after the first disbursement.
3	Designate an Environment, Safety and Occupational Health officer with direct report to the top management. Need to implement an organization structure with sufficient personnel and budget to cover their responsibilities to implement the ESMS, adequate to the size and complexity of operations, with clear lines of responsibility authority.	Organization chart, budget and job responsibilities of each personnel.	1 year after the first disbursement
4	Reduce Lost Time Incident Frequency Rate (LTIFR) to a rate to be agreed for each year or a percentage reduction over the time.	Monthly LTIFR reports.	Yearly reports after the first disbursement to reach the goal.
5	The company needs to develop an Accident Investigation procedure as part of the ESMS.	Accident Investigation procedure.	6 months after the first disbursement
6	A Labor Policy and a Grievance Mechanism needs to be developed according with the objectives of PS -2.	Labor Policy and Grievance Mechanism protocol or policy.	12 months after the first disbursement
7	Child Labor – Develop a procedure for monitoring child labor (Programa Aprendiz)	Child Labor Procedure.	3 months after the first disbursement
8	Labor Unions collective agreements (Sindicato dos Trabalhadores em Transporte Rodoviário de Jaboticabal and Sindicato dos Trabalhadores nas Indústrias de Alimentação	Report yearly Santa Adélia's accomplishments with	Before closing

	e Afins de Jaboticabal)	agreements.	
9	Security Personnel rules - To review that follows the “Use of Security Forces: Assessing and Managing Risks and Impacts” of IFC, a Guidance for the Private Sector in Emerging Markets.	Develop a Security Policy or procedure.	12months after the first disbursement
10	According with this PS-3, the client will quantify direct emissions from the facilities owned or controlled within the physical project boundary, as well as indirect emissions associated with the off-site production of energy used by the project.	Quantification of GHG emissions annually in accordance with internationally recognized methodologies and good practice.	12months after the first disbursement
	Submit an Action Plan to accomplish with the Brazilian Forestry Code (Novo Código Florestal) including a schedule of implementation. Under advice from CETESB or Fundação Florestal de São Paulo.	Register at the (CAR) Rural Environmental Cadaster.	12 months after the first disbursement
12	Start biological monitoring in the preserved areas among Santa Adélia’s cane crop areas.	Monitoring reports yearly.	12 months after the first disbursement
13	Start monitoring of environmental noise, air quality in the area of influence and mobile sources emissions in regular basis.	Monitoring reports yearly.	12 months after the first disbursement
14	Suppliers need to follow the “Supply Chain policy” to ensure sustainable procurement, produce, and include this obligation into the contracts between the parties.	Supply Chain Policy.	3 months after the first disbursement
15	Soil contamination assessment to verify soil quality according with national permissible limits for agricultural land use as well industrial use.	Soil sampling results of the three crop areas (agricultural use) and of the three plants (industrial use).	Yearly report of laboratory analysis
16	Pesticide & Chemical fertilizer’s use: To develop an integrated pest and disease management plan, categorization according with the World Health Organization (WHO)	Pesticide & Chemical Fertilizers Management Plan.	6 months after the first disbursement