

Annex 1: Environmental and Social Action Plan (ESAP)

No.	Reference	Measure	Final product/deliverable	Expected completion date
PS 1: Evaluation and Management of Environmental and Social Risks and Impacts				
1.1	Environmental and Social Management System (ESMS))	1. Strengthen/update the final, detailed, and specific ESMS for API to include: (i) policies; (ii) procedures for identifying, evaluating, and managing potential environmental, social, OHS, and labor risks and impacts associated with each Project activity, as well as for its contractors and subcontractors; (iii) internal procedures for performance of the environmental and social management plan (ESMP); (iv) organizational capacity and competency, with the definition of functions and assignment of responsibilities for implementation of this ESMS; (v) protocols for emergency preparedness and response; (vi) methods or plans for the participation of key stakeholders; (vii) external communication and grievance filing mechanisms; (ix) protocols for disclosure of information to communities, decision-making, and training; (x) protocols for evaluation and continuous improvement of the ESMS; and (xi) periodic audits and inspections with respect to the environmental, social, and OHS requirements applicable under each country’s environmental and social law.	1. Copy of AIP’s updated ESMS	1. Six months after the first disbursement.
1.2	Environmental, Social, and Occupational Health and Safety Policy	1. Provide an environmental and social policy that takes into account the context and needs of AIP and/or the Project. 2. Supplement this environmental and social policy with monitoring and communications programs for all members and levels of the organization.	1. Copy of the environmental and social policy of AIP or the Project, if different 2. Evidence of the implementation of monitoring and communications programs for all members and levels of the organization	1. Six months after the first disbursement. 2. Six months after the first disbursement.

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		3. Create a mechanism to measure continuous improvements in the implementation of environmental and social policies, as well as AIP's OHS policy.	3. Continuous improvement mechanism	3. Six months after the first disbursement.
1.3	Identification of Risks and Impacts	1. Conduct an evaluation of cumulative impacts as part of the process of identifying and assessing environmental and social risks and impacts, based on the IFC Good Practices Handbook on Cumulative Impact Assessment and Management, for the new SIP industrial park.	1. Copy of the cumulative impacts assessment for the SIP industrial park	1. 30 days before construction begins on the SIP industrial park.
1.4	Environmental and Social Management Programs (ESMPs)	<p>1. For the new SIP industrial park, develop a specific ESMP for the construction stage, with the following measures: (i) an impact management program for the physical, biological, and visual environment that will include mitigation measures for the impact on the lie of the land (in the case of removal or movement of land); compensation for removing vegetation and disturbing fauna; solid (hazardous and non-hazardous) waste management; controls on polluting gas emissions from machinery and construction equipment, disturbance of the environment due to increased generation of dust and noise; control of both industrial and domestic liquid effluents; (ii) an impact management program for the socioeconomic environment, to include social compensation measures for the communities surrounding the Project; training for construction managers and workers; measures for inter-institutional coordination; and measures to ensure safe and hygienic conditions for workers during construction.</p> <p>2. For the Project's new SIP industrial park, develop an ESMP for operation and maintenance (O&M) to include the following measures: (i) an Environmental Monitoring and Surveillance Program; (ii) a Comprehensive Solid and Liquid Waste Management Program emphasizing measures to reduce, reuse, and recycle inert materials such as metal, paper, plastic, etc., and also provide special handling measures for hazardous wastes such as oils, grease, paints,</p>	<p>1. Copy of the specific ESMP for the construction stage of the SIP industrial park.</p> <p>2. Copy of the specific ESMP for O&M of the SIP industrial park</p>	<p>1. 30 days before construction begins on the SIP industrial park.</p> <p>2. 30 days before operation starts at the SIP industrial park.</p>

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		solvents, medications, disinfectants, herbicides, pesticides, or any other special handling products used during maintenance activities in farms, distribution and/sales sites, or poultry processing plants or markets, based on local environmental and health standards; and (iii) a Labor Risks Prevention Management Program.		
1.5	Organizational Capacity	<ol style="list-style-type: none"> 1. Appoint an Occupational Health and Safety Committee and the Prevention Delegates for the Project’s new SIP industrial park. 2. Appoint and maintain for AIP or for each Project industrial park an environmental manager and an OHS manager who are qualified and located at the sites, who will report directly to the Manager/Director of the industrial park, with independent lines of responsibility to Corporate Management or the General Director of AIP. 	<ol style="list-style-type: none"> 1. Appointment of OHS Committee and Prevention Delegates for the SIP industrial park 2. Appointment of AIP staff assigned to each Project park 	<ol style="list-style-type: none"> 1. 30 days before operation of the SIP industrial park. 2. 60 days after the loan agreement is signed.
1.6	Emergency Preparedness and Response	<ol style="list-style-type: none"> 1. Strengthen and update the Emergency and Evacuation Plan of the AIP Industrial Park with: (i) procedures for interacting with local and regional emergency and health authorities; (ii) protocols for firefighters, ambulances, and other external emergency vehicle services; (iii) evacuation routes and meeting points throughout the AIP industrial park and each of the facilities/buildings that make up that industrial park; (viii) training exercises such as drills conducted annually or more often if necessary, or real events in which AIP should include nearby commercial properties and other interested key stakeholders to familiarize them with appropriate procedures in the event of an emergency. 2. Develop an Emergency and Evacuation Plan based on the conditions and infrastructure of the new SIP industrial park, to minimize the risks to employees in the event of natural 	<ol style="list-style-type: none"> 1. Copy of the strengthened and updated Emergency and Evacuation Plan for the AIP industrial park 2. Copy of the detailed and specific Emergency and 	<ol style="list-style-type: none"> 1. 45 days after the loan contract is signed. 2. 30 days before construction begins on the SIP industrial park.

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		disasters or technological hazards, with contact information for relevant or appropriate third-party collaborators.	Evacuation Plan for the SIP industrial park	
1.7	Monitoring and Evaluation Indicators	1. Develop a compliance matrix with its set of key performance indicators that should be controlled and complied with so as to be able to measure the effectiveness of the ESMP and/or the environmental surveillance programs, as well as with reference to all legal and contractual obligations for each new and existing Project work, during the construction phase and during O&M.	1. Compliance matrix with list of key management and success performance indicators	1. 45 days after the loan agreement is signed.
		2. Strengthen the Program for Monitoring Discharge of Wastewater from the WWTPs with respect to compliance with local standards and the IFC environmental, health, and safety guidelines for water and sanitation (whichever is stricter), accompanied by new training campaigns, the establishment of a “penalties/rewards” mechanism and improvement in the management of wastewater in each industrial park.	2. Copy of Program for Monitoring Discharge of Wastewater from WWTPs, for each industrial park	2. 45 days after the loan agreement is signed.
1.8	Project Compliance with Applicable Standards	1. Using an independent environmental and social consultant, periodically prepare a consolidated report on environmental, social, health and safety questions as well as on the status of compliance with the IIC Environmental Sustainability Policy, El Salvador’s environmental, social, and OHS legislation, the Environmental and Social Policies of the IDB, and the IFC Performance Standards, including progress made on ESMS actions with respect to the established key performance indicators.	1. Periodic environmental and social compliance report	1. Annually during the life of the loan
1.9	Participation of Social Stakeholders	1. For the new SIP industrial park, prepare a Comprehensive Plan for the Participation of Key Social Stakeholders both for the construction phase and for the operation phase, where for the latter phase, lessons learned during the construction phase are incorporated	1. Copy of the comprehensive plan on the participation of key social stakeholders in the SIP industrial park.	1. 30 days before construction begins on the SIP industrial park.
1.10	External Grievance	1. Develop and implement an external grievance mechanism focused on key stakeholders and communities and/or	1. Copies of AIP’s external grievance	1. 30 days before construction

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	Mechanism for the Construction Phase	owners of neighboring lands within the area of indirect influence of the Project's industrial parks that are affected or have some interest, for the construction phase of the new SIP industrial park. This external grievance mechanism will include details on how claims or complaints are recorded, investigated, and evaluated, and the process for following them up and closing or resolving them.	mechanism for the construction phase of the SIP industrial park	starts on the SIP industrial park.
			2. Copies of the evidence of their implementation in the Project's industrial parks	2. Progress report in each environmental and social compliance report.
1.11	External Grievance Mechanism for Operation and Maintenance (O&M)	1. Provide and implement an external grievance mechanism during O&M that incorporates the experiences and lessons learned during the construction phase.	1. Copies of the AIP external grievance mechanism for O&M	1. 45 days after the loan agreement is signed for the AIP industrial park and 30 days before operation of the SIP industrial park begins.
			2. Copies of the evidence of its implementation in the Project's industrial parks	2. Progress report in each environmental and social compliance report
PS 2: Labor and Working Conditions				
2.1	Human Resources Policies and Procedures	1. Develop the Project's human resources policies and procedure, to include, among other things, the promotion of gender equality and non-discrimination, equal opportunities, fair treatment, agreement with appropriate labor conditions and terms of employment, notice of termination and severance, based on its Code of Conduct for employees.	1. Copy of the AIP human resources policies and procedures	1. 45 days after the loan agreement is signed.

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		2. Develop a control and monitoring mechanism ensuring that contractors and subcontractors of engineering, procurement, and construction services comply with that human resources policy and its procedures.	2. Copy of the control and monitoring mechanism on compliance with human resources policy and its procedures	2. 45 days after the loan agreement is signed.
2.2	Workforce Protection	1. Provide (i) an employment procedure and evidence of its implementation for the company’s own workers and those contracted by third parties, in which the hiring and firing conditions are in accordance with local regulations and ILO regulations, including at a minimum standards to prevent child labor and forced labor; (ii) procedures for contracting and elimination/reduction of the company’s own job positions and those procedures adopted by contractors with respect to their workers; and (iii) procedures for management and monitoring of the performance of the company’s own workers and those contracted by third parties	1. Copy of these procedures for AIP	1. 45 days after the loan agreement is signed.
2.3	Behavioral Manual	1. Provide behavioral guidelines (rules) for Project employees, contractors and subcontractors.	1. Copy of the behavioral guidelines (rules) for AIP.	1. 45 days after the loan agreement is signed.
2.4	Workplace Health and Safety	1. Develop and implement the Labor Risks Prevention Management Program for the construction stage of the SIP industrial park.	1. Copy of the Labor Risks Prevention Management Program during the construction stage of the SIP industrial park	1. 30 days before construction begins on the SIP industrial park.
		2. Develop and implement the Labor Risks Prevention Management Program for operation of the SIP industrial park.	2. Copy of the Labor Risks Prevention Management Program during operation of the SIP industrial park	2. 30 days before operation of the SIP industrial park.

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2.5	Internal Grievance Mechanism for the Construction Phase	1. Develop and implement an internal grievance mechanism focused on direct employees, contractors, and subcontractors, for the construction phase of the new SIP industrial park. This internal grievance mechanism will include details on how claims or complaints are recorded, investigated, and evaluated and the process of monitoring and closing or resolving them.	1. Copies of the internal grievance mechanism for the construction phase of the new SIP industrial park	1. 30 days before construction begins on the SIP industrial park.
			2. Copies of the evidence of its implementation in new Project works	2. Progress report in each environmental and social compliance report.
2.6	Internal Grievance Mechanism for Operation and Maintenance (O&M)	1. Provide an internal grievance mechanism during O&M that incorporates the experiences and lessons learned from the construction phase.	1. Copies of AIP's internal grievance mechanism for O&M	1. 45 days after the loan agreement is signed for the AIP industrial park and 30 days before operation begins at the SIP industrial park.
			2. Copies of the evidence of its implementation in the Project's industrial parks	2. Progress report in each environmental and social compliance report.
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Efficient Use of Water	1. Develop a Water Consumption Reduction Program, to include an analysis of alternative savings technologies (dosing devices, etc.) and alternatives for reusing treated water from the WWTP, in each Project industrial park.	1. Copy of the Program to Reduce Water Consumption, for each Project industrial park	1. Eight months after the first disbursement
		2. Develop, as part of the Water Consumption Reduction Program, an environmental and economic feasibility study of the two (2) best alternatives for reusing treated water from the WWTPs.	2. Copy of the feasibility study on reuse of treated water from the WWTP	2. Twelve months after the first disbursement

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PS 4: Community Health and Safety				
4.1	Community Health and Safety	1. Develop a Road Safety Management Plan for construction of the new SIP industrial park, to include mitigation measures for possible impacts on the affected communities, particularly during the Project construction phase, but also including O&M and vehicular composition in the analysis	1. Copy of the road safety management plan for the SIP industrial park	1. 30 days after construction begins on the SIP industrial park
4.2	External Security Protocols and Policy	1. Provide a copy of the contract between AIP and the security company or companies for each industrial park, to verify, among other aspects, the inclusion of conditions that allow: (i) conducting reasonable investigations to ensure that security personnel do not have criminal records nor have they participated in cases of abuse, in the past; (ii) verifying details on the training needed with respect to the use of force; (iii) verifying restrictions on the use of firearms; and (iv) identifying details on training in the area of environmental awareness-building.	1. Copy of the contracts between AIP and the security company or companies	1. 45 days after the loan agreement is signed.
PS 8: Cultural Heritage				
8.1	Cultural Heritage	1. Develop a Chance Find Procedure for construction of the new SIP industrial park, in compliance with the requirements of PS-8.	1. Copy of the Chance Find Procedure for construction of the SIP industrial park	1. 30 days before construction begins on the SIP industrial park.