

Environmental and Social Action Plan (ESAP)

Project Name:	Guerrero Green Park	Project ID:	13275-01	Category:	B
Sector:	INDUSTRY	Country:	Costa Rica		

No	Action	Deliverable	Delivery date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts			
1.1	Reference: Policy		
1.1.1	Prepare an integrated environmental, social and OHS policy that follows PS1 guidelines.	Integrated environmental, social, and OHS policy	Condition preceding the first disbursement
1.1.2	Communicate the new Integrated Policy to employees, sub-contractors, and key suppliers.	Evidence indicating that the new Integrated Policy has been communicated to employees, sub-contractors, and key suppliers.	30 days after the first disbursement
1.2	Reference: Identification of Risks and Impacts		
1.2.1	Prepare and implement an Integrated Risk Assessment procedure that covers environmental, OHS, working, and local community conditions.	a. Risk and impact identification procedure b. Implementation of the procedure	a. Condition preceding the first disbursement b. 30 days after the first disbursement
1.2.2	Prepare an environmental, social, and OHS risk matrix for each phase of the Industrial Park.	Risk matrix	Condition preceding the first disbursement
1.3	Reference: Management Programs		
1.3.1	Prepare and implement efficient water management and effluent control procedures.	a. Efficient water management procedures and emissions, effluents, dust, vibration, and noise control procedures for the construction and operation phases. b. Implementation of the procedures	a. Condition preceding the first disbursement b. 30 days after the first disbursement
1.3.2	Update and implement OHS management, waste management, and efficient resource management procedures that comply with IFC performance standards, World Bank General Guidelines on the Environment, Health, and Safety, together with measures, deadlines, responsibilities, targets, and indicators.	a. Updated management procedures b. Implementation of the procedures	a. 30 days after the first disbursement b. 60 days after the first disbursement
1.3.3	Ensure that the project's construction contracts comply with these ESMS procedures and environmental regulations.	Project Works Contracts	Condition preceding the first disbursement
1.4	Reference: Emergency Preparedness and Response		
1.4.1	Update and implement an Emergency Preparedness and Response Plan (Corporate EPRP) that includes (i) how to coordinate with each tenant and secure the required response to events occurring outside working hours within their facilities, (ii) incorporate into the plan the required drawings, risk map sketches, fire protection systems and equipment, and (iii) a description of the potential emergencies.	a. Updated EPRP b. Implementation of the EPRP	a. 30 days after the first disbursement b. 60 days after the first disbursement

1.4.2	Prepare and implement a detailed EPRP practice program with tenant involvement.	a. EPRP - Physical training program. b. Evidence of implementation	b. 30 days after the first disbursement c. 60 days after the first disbursement
1.5	Reference: Monitoring and Review		
1.5.1	Prepare and implement an environmental, social, labor, and OHS risk monitoring procedure.	a. Monitoring and evaluation procedure b. Proof of implementation	a. 30 days after the first disbursement b. 60 days after the first disbursement
1.5.2	Prepare a matrix to track compliance with key performance indicators on environmental, occupational health and safety, and social issues, including a) Safety - Lost Time Incident Frequency Rate (LTIFR - Number of lost time incidents per million hours worked); accident-free days (number of days since last lost time incident); b) Sustainability: greenhouse gases (kg CO ₂ emitted / tons produced), water use (m ³) and energy efficiency (kWh), emissions: effluent monitoring; c) Social - Number of environmental and social complaints from local communities.	a. Monitoring matrix b. Update by parent company	a. 30 days after the first disbursement b. Annual report to IDB Invest
1.6	Reference: External Communication and Grievance Mechanisms		
1.6.1	Prepare and implement a Stakeholder Engagement Plan that (i) identifies the stakeholders that may be interested in or affected by Industrial Park's business, (ii) describes the communication channels with these stakeholders; (iii) describes how stakeholders and the general public will be regularly informed about the Institution's environmental and social performance; and (iv) defines the GDPI person responsible for liaising with local communities.	a. Stakeholder engagement plan b. Proof of implementation	a. 30 days after the first disbursement b. 90 days after the first disbursement
1.6.2	Prepare and implement a procedure for documenting the external grievance mechanism that: i) defines the person responsible for registering complaints, working with relevant staff, investigating complaints, determining the required measures, and reporting the results to the complainants; ii) establishes guidelines for registering, analyzing, categorizing, investigating, choosing alternative solutions, and that indicates the deadline for responses; and iii) defines how the grievance mechanism will be publicized, so that local communities will know where to go and who to contact when required.	a. External grievance mechanism procedure b. Proof of implementation	a. 60 days after the first disbursement b. 90 days after the first disbursement
PS 2: Labor and Working Conditions			
2.1	Reference: Human Resources Policies and Procedures		
2.1.1	Formulate a Human Resources Policy that complies with PS2 guidelines.	a. Human Resources Policies	a. 30 days after the first disbursement
2.1.2	Communicate the HR policy to current employees and new employees during their induction.	Documentary evidence that the Human Resources Policy has been communicated	60 days after the first disbursement
2.2	Reference: Working Conditions and Terms of Employment		
2.2.1	Prepare and implement internal labor regulations that inform employees of their rights, in accordance with national labor and employment legislation, including their rights with respect to working hours, wages, overtime, compensation, and benefits granted when their employment relationship begins and when any substantial change occurs, which refers to the internal grievance mechanism.	a. Internal Labor Regulations b. Proof of implementation	a. 60 days after the first disbursement b. 90 days after the first disbursement
2.3	Reference: Grievance Mechanism		
2.3.1	Prepare and implement an internal Grievance Mechanism following PS-2 requirements that apply to both direct employees and sub-contractors.	a. Internal Grievance Mechanism b. Proof of implementation	a. Condition preceding the first disbursement

			b. 30 days after the first disbursement
2.3.2	Define the person responsible for monitoring the internal grievance mechanism	Updated functional organization chart	Condition preceding the first disbursement
2.4	Reference: Occupational Health and Safety		
2.4.1	Update the Occupational Health and Safety (OHS) Program to i) log accidents for both direct and indirect employees; ii) monitor the Lost Time Incident Frequency Rate ("LTIFR") and Lost Time Injury Severity Rate ("LTISR"); and iii) incorporate formal procedures into the audit of sub-contractors' compliance with OHS regulations.	Updated OHS program	30 days after the first disbursement
2.4.2	Integrate into each sub-contractor's contract the requirement to comply with the OHS Program.	Sub-contractor contracts	Prior to the start of the Project's construction.
2.5	Reference: Workers Engaged by Third Parties		
2.5.1	Prepare and implement a Supplier Code of Conduct (SCC) that applies to any entity with a contractual relationship with the company, which addresses issues such as compliance with local laws, anti-discrimination practices, and commits it to timely payment of wages, non-discrimination, equal opportunities, prohibition of child and forced labor, and compliance with occupational health and safety regulations.	a. Supplier Code of Conduct b. Proof of implementation	a. and b. Prior to the start of the Project's construction
2.5.2	Ensure that GDPI sub-contractors are contractually required to comply with the SCC.	Sub-contractor contracts	Prior to the start of the Project's construction
PS 3: Resource Efficiency and Pollution Prevention			
3.1	Reference: Solid Waste Management		
3.1.1	Update the Solid Waste Management Program to: (i) incorporate the requirements in environmental regulations, the IFC performance standards, and the World Bank General Guidelines on the Environment, Health, and Safety; (ii) define the initiatives that reduce waste and encourage reuse and recycling; (iii) define the operational procedures and temporary storage controls for various types of waste; iv) define the operational procedures and controls for treating and disposing of various types of waste; v) establish recycling targets and monitor recycling and waste generation indicators; vi) identify the companies hired to collect each type of waste; and vii) clearly define deadlines, responsibilities, resources, targets, and indicators for each of the program's measures.	Updated Solid Waste Management Program	30 days after the first disbursement
3.1.2	Contractually require project sub-contractors to adopt waste management procedures in accordance with the Solid Waste Management Program.	Sub-contractor contracts	Prior to the start of the Project's construction
PS 4: Community Health, Safety, and Security			
4.1	Reference: Infrastructure and Equipment Design and Safety		
4.1.1	Improve the reliability of fire protection systems by (i) adding three sectoring valves for the underground looped pipeline, (ii) providing electronic monitoring for the building's internal fire alarm system that reports to the main security room, and (iii) adding hydrant equipment cabinets as required.	Evidence of inclusion of these three items in the fire protection system	Annual report to IDB Invest
4.1.2	Prepare and implement a maintenance program for fire prevention systems in the park, including fire alarms, fire pump systems, and main hydrant pipelines.	a. Operation and Maintenance Program b. Proof of implementation	a. and b. Annual report to IDB Invest
4.2	Reference: Security Personnel		

4.2.1	Prepare a code of conduct for security personnel at the Industrial Park, to ensure that they comply with PS4 requirements and the United Nations Voluntary Principles on Security and Human Rights.	Code of Conduct for security personnel.	60 days after the first disbursement
4.2.2	Update contracts with security firms to include the requirements described in the code of conduct for security personnel.	Updated contracts with security firms	90 days after the first disbursement
PS 8: Cultural Heritage			
8.1	Reference: Cultural Heritage		
8.1.1	Prepare chance find procedures that are mandatory for sub-contractors.	Chance Find Procedures	Prior to the start of the Project's construction