

Promarisco – ECUADOR
Environmental and Social Action Plan (ESAP)

No.	Action	Product/Deliverable	Completion Date
ND 1: Assessment and Management of Environmental and Social Risks			
1.1 E&S Assessment and Management System			
1.1.1	Develop an environmental and social management system (ESMS) to include or update the following: i) policies; ii) identification of risks and impacts; iii) management programs; iv) organizational capacity and competency; v) emergency preparedness and response; vi) stakeholder engagement; vii) external communication and grievance mechanism; viii) ongoing reporting to affected communities; and ix) monitoring and reporting.	ESMS document.	Within 180 days after the loan agreement has been signed.
1.1.2	Implement the ESMS.	Evidence of implementation.	Within 365 days after the loan agreement has been signed, and later as part of the environmental and social compliance report (ESCR).
1.2 Policy			
1.2.1	Develop a community health and safety policy.	Community health and safety policy.	Within 90 days after the loan agreement has been signed.
1.2.2	Adopt the community health and safety policy.	Evidence of adoption.	Within 150 days after the loan agreement has been signed, and later as part of the ESCR.
1.2.3	Disseminate the community health and safety policy among the people in direct social influence area (ADSI), the contractors and the workers.	Evidence of dissemination.	Within 150 days after the loan agreement has been signed, and later as part of the ESCR.
1.3 Identification of Risk and Impacts			
1.3.1	Develop a procedure to identify and assess environmental risks and impacts.	Procedure to identify and assess environmental risks and impacts.	Within 90 days after the loan agreement has been signed.
1.3.2	Implement a general matrix of environmental risks and impacts for each production plant (lab, farms, and packaging plant).	General matrix of environmental risks and impacts for each production plant (lab, farms, and packaging plant).	Within 120 days after the loan agreement has been signed, and later as part of the ESCR.
1.3.3	Develop the occupational hazards identification and risk assessment (HIRA) matrix for its lab in Chanduy.	HIRA matrix for the lab in Chanduy.	Within 90 days after the loan agreement has been signed.
1.3.4	Develop a procedure to identify and assess risks and impacts on the community, as generated by its operations at all levels of production (lab, farms and packaging plant), which will include, at least, the following: i) a methodology to assess the inherent social risks of each operation; ii) a map of the stakeholders of the ADSI; iii) a cartograph with the critical points of the operation (discharges, noise, odor, emissions) with the corresponding ADSI.	Procedure to identify and assess risks and impacts on the community.	Within 90 days after the loan agreement has been signed.
1.3.5	Implement the matrix to identify and assess risks and impacts on the communities of the ADSI.	Matrix to identify the hazards, risks and impacts on the communities.	Within 120 days after the loan agreement has been signed.

1.3.6	Develop a procedure to identify and assess gender risks based on IDB Invest's Gender Risk Assessment Tool (GRAT) ¹ to be applied at the lab, the shrimp farms and the packaging plant, to include at least: i) an occupational health and safety (OHS) risk assessment; ii) a map of the areas that are vulnerable to sexual exploitation of women and minors in the Project's ADSIs; and iii) an analysis of whether the presence of workers may or may not increase such a risk.	Procedure to identify and assess gender risks.	Within 180 days after the loan agreement has been signed.
1.3.7	Update its emergency plans (self-protection plans) to consider the most relevant climate risk scenarios (natural disasters and climate change) across the value chain.	Updated emergency plans	Within 180 days after the loan agreement has been signed.
1.3.8	Update the permits to use surface and groundwater for its packaging plant and Marfrisco and notify when the regulatory changes require to get water use permits for its shrimp farms located on the islands.	Updated permits to use surface and groundwater	Within 180 days after the loan agreement has been signed.
1.4	Management Programs		
1.4.1	Develop a corporate procedure for the end-to-end management of solid and liquid waste in accordance with the national laws and technical regulations, and the World Bank's Environmental, Health, and Safety General Guidelines ² .	Procedure for end-to-end management of solid and liquid waste.	Within 120 days after the loan agreement has been signed.
1.4.2	Disseminate the procedure for end-to-end management of solid and liquid waste to all its direct employees and main contractors.	Evidence of dissemination.	Within 150 days after the loan agreement has been signed.
1.4.3	Implement the procedure for end-to-end management of solid and liquid waste.	Evidence of implementation.	Periodically in the ESCR.
1.4.4	Develop procedures for the environmental management of air quality, environmental noise, hazardous materials according to the national laws and technical standards, the World Bank's Environmental, Health, and Safety General Guidelines, and the Environmental, Health, and Safety Guidelines for aquaculture ³ .	Procedure for the environmental management of air quality, noise and hazardous materials.	Within 180 days after the loan agreement has been signed.
1.4.5	Implement the procedure for the environmental management of air quality, noise, and hazardous materials.	Evidence of implementation.	Periodically in the ESCR.
1.4.6	Develop a procedure to manage and maintain the workers' camps.	Procedure to manage and maintain the workers' camps.	Within 120 days after the loan agreement has been signed.
1.4.7	Implement the procedure to manage and maintain the workers' camps.	Evidence of implementation.	Periodically in the ESCR.
1.4.8	Develop a road safety procedure to include road emergency preparedness and response plans that consider the emergency assistance of the driver and third parties.	Road safety procedure.	Within 120 days after the loan agreement has been signed.
1.4.9	Implement the road safety procedure.	Evidence of implementation.	Periodically in the ESCR.
1.5	Organizational Capacity and Competency		
1.5.1	Appoint a person, who will report directly to the general manager, to oversee implementing the ESMS and monitoring the environmental and social (E&S) performance of the Company and its subsidiaries.	Appointment of the person in charge.	Within 90 days after the loan agreement has been signed.
1.6	Emergency Preparedness and Response		
1.6.1	Update the emergency plans (self-protection plans) to include: i) material resources and means of communication available to deal with emergencies on its shrimp farms; ii) a protocol for evacuation in case of medical emergencies; iii) periodic consultations with the community in the	Updated emergency plans.	Within 180 days after the loan agreement has been signed.

¹ <https://www.idbinvest.org/es/publicaciones/herramienta-de-evaluacion-de-riesgos-de-genero>

² <https://documents1.worldbank.org/curated/en/862351490601664460/pdf/112110-SPANISH-General-Guidelines.pdf>

³ <https://www.ifc.org/wps/wcm/connect/950277c1-6f16-4c07-9ad2-f1af63e7a3a6/0000199659ESes%2BAquaculture%2Brev%2Bcc.pdf?MOD=AJPERES&CVID=nPtf56r>

	ADSI to identify emergency scenarios inside and outside the site; iv) external communication channels; v) shared resources and collective systems of community response; and vi) an emergency protocol in case of ammonia leakage updated to include the requirements of the International Institute of Ammonia Refrigeration (IIAR).		
1.6.2	Disseminate the updated emergency plans.	Evidence of dissemination.	Periodically in the ESCR.
1.7	Monitoring and Review		
1.7.1	Develop a procedure to assess the Company's ESMS management to include key performance indicators.	Procedure to assess the ESMS performance.	Within 270 days after the loan agreement has been signed.
1.7.2	Implement the procedure to assess the Company's ESMS performance.	Evidence of implementation.	Periodically in the ESCR.
1.7.3	Develop a legal and contractual compliance matrix, which includes: i) the control agency that issues the permit or license; ii) the issuance and expiration dates; and iii) the internal staff responsible for renewing them.	Legal and contractual compliance matrix.	Within 120 days after the loan agreement has been signed.
1.7.4	Implement a legal and contractual compliance matrix.	Evidence of implementation.	Periodically in the ESCR.
1.7.5	Develop a legal requirements compliance procedure, to establish the guidelines, responsibilities and methodology to identify, access, update, communicate, assess and monitor compliance with all the legal and contractual requirements for its operations.	Legal requirements compliance procedure.	Within 150 days after the loan agreement has been signed, and later as part of the ESCR.
1.7.6	Implement the legal requirements compliance procedure.	Evidence of implementation.	Periodically in the ESCR.
1.7.7	Prepare an internal or external auditing procedure, which includes the people responsible, methodology, schedule and action plans.	Internal or external auditing procedure.	Within 150 days after the loan agreement has been signed, and later as part of the ESCR.
1.7.8	Implement the action plans resulting from the internal and external audits and update the ESMS with the corresponding operation changes so that they contribute to its continuous improvement.	Implemented action plans.	Periodically in the ESCR.
1.8	External Communication and Grievance Mechanism for the Affected Communities		
1.8.1	Update the Company's external grievance mechanism to be culturally appropriate and easily accessible, and to involve no cost or retaliation risk for those voicing a problem or concern; it shall include, at least: i) details on how the grievances are received; ii) a documentation system to record, follow up on and analyze grievances and solutions; iii) records of response; iv) communication and dissemination mechanisms for the grievances received and processed to the external stakeholders; v) a top management review to assess system effectiveness; and vi) dissemination of the mechanism to the stakeholders.	<ol style="list-style-type: none"> Updated external grievance mechanism. Evidence of dissemination. 	<ol style="list-style-type: none"> Within 120 days after the loan agreement has been signed. Within 180 days after the loan agreement has been signed.
1.8.2	Implement the external grievance mechanism.	Evidence of implementation.	Periodically as part of the ESCR.
1.8.3	Generate statistical data about the use of the external grievance mechanism (PQR).	Statistical data about external grievances.	Periodically as part of the ESCR.
ND 2: Labor and Working Conditions			
2.1	Working Conditions and Terms of Employment		
2.1.1	Implement the necessary improvements according to IFC-EBRD's guidance on Workers' Accommodation: Processes and Standards ⁴ at the camps, such as a partition or physical barrier that guarantees the privacy of each worker at the community showers in the camps of the shrimp farms.	Evidence of implementation.	Within 180 days after the loan agreement has been signed.

⁴ https://www.ifc.org/wps/wcm/connect/60593977-91c6-4140-84d3-737d0e203475/workers_accomodation.pdf?MOD=AJPERES&CACHEID=ROOTWORKSPACE-60593977-91c6-4140-84d3-737d0e203475-ijetNih

2.2	Internal Grievance Mechanism		
2.2.1	Prepare a program to train on the use of this mechanism, to be implemented and disseminated among contractors and subcontractors.	Training program.	Within 120 days after the loan agreement has been signed.
2.2.2	Train the workers engaged by contractors and subcontractors on the use of the internal grievance mechanism.	Evidence of training.	Within 150 days after the loan agreement has been signed.
2.2.3	Generate statistical data about the grievances received.	Statistical data about internal grievances.	Periodically in the ESCR.
2.3	Occupational Health and Safety		
2.3.1	Develop an annual occupational health and safety management plan, which includes goals to reduce the frequency, severity and risk figures as well as the following: i) identifying possible risks for the workers; ii) establishing prevention and protection measures, such as changing, substituting or eliminating hazardous substances or conditions; iii) training workers; iv) documenting and submitting reports on occupational incidents, accidents and diseases; and v) preparing and responding to emergencies.	Occupational health and safety management plan.	Within 180 days after the loan agreement has been signed, and later as part of the ESCR.
2.3.2	Implement the occupational health and safety plan.	Evidence of implementation.	Periodically in the ESCR.
2.3.3	Develop a safety strategy that promotes workers' commitment to and engagement in occupational health and safety across the Company.	Occupational health and safety strategy.	Within 180 days after the loan agreement has been signed, and later as part of the ESCR.
2.3.4	Develop a training program based on the results of the health assessments per work position and notify employees continuously about occupational risk exposure deriving from: i) lifting and moving goods; ii) repetitive tasks and inappropriate body position when lifting goods; ii) exposure to chemical products; iii) exposure to heat and cold; iv) infectious diseases; v) confined spaces; and v) vibrations.	Training program.	Within 180 days after the loan agreement has been signed.
2.3.5	Implement the occupational risk training program.	Evidence of implementation.	Periodically in the ESCR.
2.3.6	Implement speed control safety signs on all its shrimp farms for vehicles, motorcycles and heavy vehicles used during operations.	Evidence of implementation.	Within 180 days after the loan agreement has been signed.
2.3.7	Make the warehouses at the shrimp farms suitable to store hazardous materials (solid, liquid and compressed gases) according to the requirements of the national laws and standards, and the World Bank's Environmental, Health, and Safety General Guidelines.	Evidence of adaptation works.	Within 180 days after the loan agreement has been signed.
2.3.8	Measure workplace noise at all shrimp farms, the packaging plant, and the lab, in compliance with the maximum permissible limits set forth in the national regulations and those established in the World Bank's Environmental, Health, and Safety General Guidelines.	Quarterly measurements of workplace noise.	Every 3 months after the loan agreements has been signed.
2.3.9	Develop a procedure to provide food services that guarantee food safety at the camps.	Procedure to provide food services.	Within 90 days after the loan agreement has been signed.
2.3.10	Implementation of the procedure to provide food services.	Evidence of implementation.	Periodically in the ESCR.
2.3.11	Monitor periodically the quality of the water to be consumed by the direct employees and the contractors.	Monitoring reports.	Every 3 months after the loan agreements has been signed.

2.3.12	Adapt the camp facilities to provide areas of leisure and rest for the direct workers and the contractors.	Evidence of adaptation works.	Within 270 days after the loan agreement has been signed.
2.4	Provisions for people with disabilities		
2.4.1	Establish specific provisions for employees with disabilities within the Company, which assure the workers perform at their best in the workplace and consider including the universal principles in the design, construction, and operation (including emergency and evacuation plans) of both new buildings or refurbished, expanded or modernized facilities to maximize use for all potential users, including people with disabilities, across all facilities.	Specific provisions for employees with disabilities.	Within 180 days after the loan agreement has been signed.
2.5	Workers Engaged by Third Parties		
2.5.1	Include specific clauses in the work contracts with the service providers to comply with the labor, occupational health and safety, and environmental regulations.	Service agreements with third parties including environmental, labor and OHS clauses.	When the new work contract has been signed.
2.5.2	Include in the contractor and supplier management procedure an onboarding instance carried out by the Company on the internal procedures that shall be complied with.	Updated supplier and contractor management procedure.	Within 120 days after the loan agreement has been signed.
ND 3: Resource Efficiency and Pollution Prevention			
3.1	Resource Efficiency		
3.1.1	Carry out an annual inventory of Scope 1 and 2 greenhouse gases (GHG) and Scope 3 material emissions.	Inventory of GHG emissions.	Periodically as part of the ESCR.
3.1.2	Develop a procedure to operate and monitor the effluents from the wastewater treatment system (PTAR) in the packaging plant, including: i) actions to follow in the different emergency scenarios; and ii) the formats to record the monitoring data on the daily effluents onto River Daule, in compliance with the parameters in the national regulation in force and the World Bank's Environmental, Health, and Safety General Guidelines.	Procedure to operate the PTAR in the packaging plant.	Within 120 days after the loan agreement has been signed.
3.1.3	Monitor daily effluent values for the packaging plant to check compliance with the parameters in the national regulations in force and the World Bank's Environmental, Health, and Safety General Guidelines.	Records of effluents monitoring at packaging plant.	Periodically as part of the ESCR.
3.1.4	Develop a monitoring plan for the effluents from the shrimp farms, which specifies the values that are daily and biannually monitored in compliance with the parameters in the national regulations in force and the World Bank's Environmental, Health, and Safety Guidelines for aquaculture.	Monitoring plan for the effluents from the shrimp farms.	Within 120 days after the loan agreement has been signed.
3.1.5	Implement the monitoring plan for the effluents from the shrimp farms.	Monitoring reports.	Periodically as part of the ESCR.
3.1.6	Develop a water use program that contains the measures that are technically viable to improve use efficiency and promote consumption reduction.	Water use program.	Within 90 days after the loan agreement has been signed.
3.1.7	Implement the water use program.	Evidence of implementation.	Periodically as part of the ESCR.
3.1.8	Develop a monitoring plan for surface and groundwater abstraction to assure that the process is in line with the permits granted.	Monitoring plan for surface and groundwater abstraction.	Within 60 days after the loan agreement has been signed.
3.1.9	Implement the monitoring plan for surface and groundwater abstraction.	Evidence of implementation.	Periodically as part of the ESCR.

3.1.10	Carry out general maintenance in the temporary storage sites, which shall provide for: i) waste-type-specific compartments; ii) signs for each type of stored waste; iii) spill kits for hazardous waste; and iv) compatible waste storage.	Evidence of implementation.	Within 180 days after the loan agreement has been signed.
3.1.11	Measure environmental noise quarterly in compliance with the national laws in force and the World Bank's Environmental, Health, and Safety General Guidelines.	Records of quarterly measurements.	Periodically as part of the ESCR.
3.1.12	Measure biannually combustion gases and particulate material at fixed sources in compliance with the parameters in the national laws in force and the World Bank's Environmental, Health, and Safety Guidelines.	Records of biannual measurements.	Periodically as part of the ESCR.
3.1.13	Measure air quality annually in compliance with the national laws in force and the World Bank's Environmental, Health, and Safety Guidelines for aquaculture.	Records of annual measurement.	Periodically as part of the ESCR.
3.1.14	Develop a program to reduce power consumption and keep records of power consumption.	Program to reduce power consumption.	Within 90 days after the loan agreement has been signed.
3.1.15	Implement the program to reduce power consumption.	Evidence of implementation.	Periodically as part of the ESCR.
3.2	Pesticide Use and Management		
3.2.1	Update the plague control procedure to exclude from the list class Ia substances (extremely hazardous) and class Ib substances (highly hazardous); if class II (moderately hazardous) substances are used, details shall be added about its storage, training on how to use them, as well as adequate EPP and facilities to manipulate, store, apply and properly dispose of them.	Updated list of pesticides.	Within 180 days after the loan agreement has been signed.
ND 4: Community Health, Safety and Security			
4.1	Infrastructure and Equipment Design and Safety		
4.1.1	Keep constant communication with the communities identified in the ADSI where the Company operates.	Evidence of meetings with and information offered to the community.	Periodically in the ESCR.
4.1.2	Develop a transport service procedure in line with the principles described in the World Bank's Environmental, Health, and Safety General Guidelines and the international best practices to protect the safety of the drivers and the traffic ⁵ , to be applied to all its own and third-party personnel.	Transport service procedure applicable to its own and third-party personnel.	Within 180 days after the loan agreement has been signed.
4.1.3	Implementation of the transport service procedure.	Evidence of implementation.	Periodically in the ESCR.
4.1.4	Extend the emergency plans (self-protection plans) to the communities in the ADSI and its facilities, involving them in simulations based on the level of exposure to the risks identified.	Evidence of dissemination.	Within 270 days after the loan agreement has been signed, and later as part of the ESCR.
4.1.5	Execution of simulations with involvement of the community.	Evidence of implementation.	Periodically in the ESCR.
4.2	Security Personnel		
4.2.1	Update the safety management plans, according to the "Good Practice Handbook: Use of Security Forces: Assessing and Managing Risks and Impacts, Guidance for the Private Sector" issued by the International Finance Corporation (IFC) ⁶ , to include, among other things, the	Updated security management plan.	Within 180 days after the loan agreement has been signed.

⁵ Good Practice Note: Road Safety World Bank <https://thedocs.worldbank.org/en/doc/648681570135612401-0290022019/original/GoodPracticeNoteRoadSafety.pdf>

⁶ https://www.ifc.org/wps/wcm/connect/5e74e4d6-f977-49f3-85cb-e626519b0e49/p_handbook_SecurityForces_2017_Spanish.pdf?MOD=AJPERES&CVID=nzgFMTI

	measures adopted by the security company for engaging and consulting with the communities in the ADSI about security issues.		
4.3.1	Train the security personnel in human rights in the terms of the “Good Practice Handbook: Use of Security Forces: Assessing and Managing Risks and Impacts, Guidance for the Private Sector” issued by the International Finance Corporation.	Training records.	Within 180 days after the loan agreement has been signed, and later as part of the ESCR.
ND 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources			
6.1	Biodiversity Conservation and Natural Habitats		
6.1.1	Comply with the existing biodiversity action plans (in-situ measurement of the required buffer area).	Evidence of compliance	Within 90 days after the loan agreement has been signed, and later as part of the ESCR.
6.1.2	Develop a program to preserve and conserve the biota and rescue wildlife.	Program to preserve and conserve the biota and rescue wildlife.	Within 180 days after the loan agreement has been signed.
6.1.3	Implement the program to preserve and conserve the biota and rescue wildlife.	Evidence of implementation.	Periodically in the ESCR.
6.1.4	Develop a procedure to handle specimen escape.	Procedure to handle specimen escape.	Within 180 days after the loan agreement has been signed.
6.2	Supply Chain		
6.2.1	Develop a supply chain policy that includes georeferenced verification systems and practices to strengthen the traceability of its main suppliers.	Supply chain policy.	Within 90 days after the loan agreement has been signed, and later as part of the ESCR.
6.2.2	Implementation of the supply chain policy.	Evidence of implementation.	Periodically in the ESCR.