



# Environmental and Social Management System

## Toolkit and Case Studies

### **ANIMAL PRODUCTION**

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# Welcome & How to Use This ESMS Toolkit and Case Studies

Environmental and social responsibility is becoming more and more important in today's global economy. There are thousands of environmental and social codes and standards in the world today. The codes and standards define the rules and the objectives. But the challenge is in the implementation. An environmental and social management system helps companies to integrate the rules and objectives into core business operations, through a set of clearly defined, repeatable processes.

In the following pages, we provide tools to build or enhance your environmental and social management system (ESMS). Section I is the Toolkit — sample documents, blank forms, flowcharts, checklists and templates. There are tools for each of the nine elements in your ESMS. Section II is the Case Studies — examples of how two different companies used the tools and developed and implemented an ESMS appropriate to the size and nature of their business.

As you go through the Toolkit and Case Studies, you may want to refer back to the companion publication, the ESMS Implementation Handbook, which gives more background on each of the nine ESMS elements.

It is important to remember that simply creating a book of policies and procedures is not the end — just the beginning. They need to be implemented and turned into consistent processes.

Quick Reference for Using the ESMS Toolkit and Case Studies	
<b>Section I - Toolkit</b>	This section provides tools, including forms, templates, checklists and other useful documents, to help you develop and implement an ESMS.
<b>Section II - Case Studies</b>	This section presents the stories of two companies in the chicken and livestock production industry that implemented an ESMS. These cases illustrate how the two companies <b>used the tools</b> presented in Section I – Toolkit.
<b>ESMS Self-Assessment and Improvement Guide</b>	This companion publication contains a questionnaire, maturity matrix and improvement tips to help you measure the maturity of your ESMS and develop a plan for improvement.
<b>ESMS Implementation Handbook</b>	This companion publication provides background on environmental and social management systems in a particular industry and offers step-by-step instructions on how to develop and implement an ESMS.

## Acknowledgments

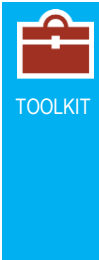
*ESMS Toolkit and Case Studies – Animal Production* was prepared by the Sustainable Business Advisory (SBA) department, with primary contributions from Robert Horner, Irene Angeletti and Larissa Luy.

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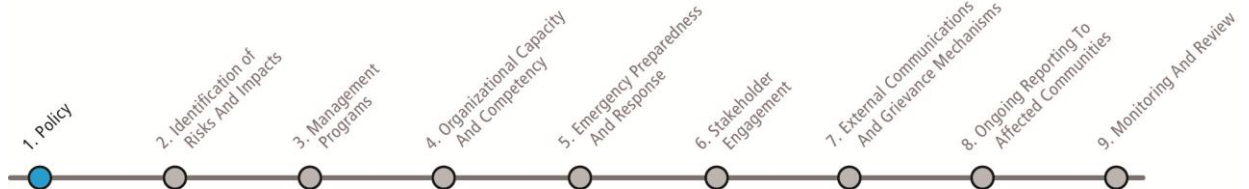


# ESMS Toolkit

## **ANIMAL PRODUCTION**



# 1. Policies



## Policies

### Introduction

Policies are the foundation of your Environmental and Social Management System (ESMS). They are the rules that you expect your people to follow and the public statement you make about what your company believes in and how you strive to conduct your business.

The process of adopting environmental and social policies provides a company with an opportunity to think about and discuss what is important. Ultimately, it also enables you to gain the commitment and support of senior management as they approve and communicate the policies.

We present two tools related to this element:

- Checklist for Developing a Company Policy Statement
- Sample CEO Letter announcing the ESMS





# 1. Policy

## Checklist for Developing a Company Policy Statement

### Instructions:

Use this checklist to make sure that you are considering the relevant issues in your environmental and social policy.

### Environment

- Environmental laws and regulations
- Resource efficiency and cleaner production principles in animal production and raising processes
- Emissions and effluents
- Conversion of forested land and natural habitats
- Resource efficiency
  - Consumption of energy, water, feed and other resources
  - Greenhouse gas (GHG) emissions
  - Pollution prevention
    - Release of pollutants into air, water and land
    - Generation of hazardous and non-hazardous waste materials
    - Recovering, reusing, treating and disposing of waste
    - Emissions and residue
    - Pests and vectors
    - Effects of pesticides and other chemicals on non-target species and the environment, and development of resistance

### Labor and Working Conditions

- Human resources policies and procedures
  - Labor standards policies and procedures
  - Clear communications throughout the company
- Working conditions and terms of employment
  - Respect collective bargaining agreement, if applicable
  - Reasonable working conditions and terms of employment including work hours, wages, overtime, compensation and benefits
  - Protection for migrant, temporary and contract workers
  - Clean and appropriate accommodations, if applicable
- Workers' organizations
  - Workers' rights to form and to join workers' organizations
  - Non-discrimination against those who organize



## 1. Policy

- Non-discrimination and equal opportunity
  - Hiring, promoting and compensating workers
  - Training, tools and opportunities for advancement
  - Freedom from harassment by management or other workers
  - Positive discrimination, if applicable
- Retrenchment
  - Consideration of alternatives and mitigation in case of retrenchment
  - Payments and benefits
- Grievance mechanism
  - Transparent process for receiving and resolving worker complaints
  - No retaliation or discrimination
- Child labor
  - Minimum age for employment
  - Conditions for engagement of young workers
- Forced labor
  - Freedom of movement, freedom to resign
  - No retention of identification papers or money to detain workers
- Occupational health and safety
  - Safe work environment and dormitories, if applicable
  - Emergency prevention and response system
  - Personal protective equipment and appropriate training
  - Document and report accidents, diseases and incidents
- Workers engaged by third parties
  - Extension of labor and OHS policies to labor contractors, recruiting agencies and other third parties
  - Grievance mechanism for contracted workers
- Supply chain
  - Extension of policies and monitoring of supply chain with respect to child labor, forced labor and worker safety to supply chain

### Community Health, Safety and Security

- Community Health and Safety
  - Biosecurity and consumer safety
  - Health, safety and security of the public from activities, equipment, infrastructure and outbreak of epizootic diseases



## 1. Policy

- Design, construct, operate and decommission equipment and infrastructure in a way to avoid environmental impact and the occurrence of incidents and injuries
  - Potential community exposure to hazardous materials and substances
  - Delivery, transportation and disposal of hazardous wastes
  - Impact or reliance on ecosystem services
  - Community exposure to outbreak of epizootic diseases; and water-borne, vector-borne and communicable diseases that may be associated with company activities
  - Communicable diseases that may be associated with the influx of temporary or permanent project labor
  - Emergency situations caused by activities, equipment and infrastructure
- Security personnel
- Screening, training, equipping and monitoring direct or contracted workers providing security services
  - Grievance mechanism for workers and the community to express concerns about the security system and personnel engaged by the company



### Sample CEO Letter announcing the ESMS - Internal

To all employees of our company:

Our vision for our company is to become one of the most respected and admired animal rearing companies in our area. We aspire to conduct ourselves in an ethical and responsible manner. Corporate social responsibility, which spans environmental, human rights, labor and social issues, is a growing concern to investors, consumers and to all of us as people.

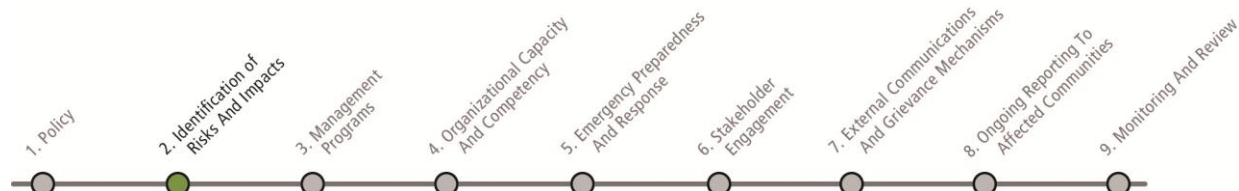
To integrate corporate social responsibility into our day-to-day business activities, we are developing and implementing an environmental and social management system (ESMS). A management system involves trained, committed employees routinely following procedures and continually improving.

I ask for your full cooperation in this important initiative. We believe that corporate social responsibility must be a foundation of our long-term growth and profitability. Not only is it an integral part of our overall business strategy, but it is also the right thing to do. It is the right thing for our customers, our suppliers, our shareholders, our communities and for you, as a core part of this company.

As we strive to successfully implement our ESMS, we will train and involve you throughout the process. [Person's name and title] is in charge of this corporate social responsibility initiative. Each of you has a direct line of communication with [person] for any suggestions or concerns. I thank you for your efforts and your continued dedication to our success.



## 2. Identification of Risks and Impacts



# Identification of Risks and Impacts

## Introduction

Identifying your risks can seem like a daunting task, but don't be overwhelmed. Scale your program as appropriate for the size and complexity of your company. But remember, small companies can have the same risks and potentially severe environmental and social impacts as large companies.

Think of your risk identification and assessment as a value-added activity, an opportunity to gather information that will help to effectively improve your operations. Risk identification and assessment is an ongoing process; situations change over time, so it should be repeated at regular intervals.

When identifying your risks, be mindful of the different risks that may be faced by women and men. Also, consider the risks to people outside your company – your external stakeholders.

We present four tools related to this element:

- Risk Identification Worksheet
- Process Mapping Tool
- Physical Mapping Tool
- Risk Assessment Form



## 2. Identification of Risks and Impacts

LABOR AND WORKING CONDITIONS RISKS		
RISK FACTORS	My company has the following conditions (circle the appropriate answer)	Potential negative impact (A “yes” response means that there is a potential negative impact)
There is a difference in nationality, race or religion between workers and managers.	Yes/No	Discrimination. Disciplinary abuse and harassment.
We have an apprentice program that provides young workers with training and work experience.	Yes/No	Forced labor. Child labor.
We use recruiting agencies and contract workers.	Yes/No	Inadequate wages, benefits and contracts. Forced labor.
We use homeworkers or contractors that use homeworkers.	Yes/No	Inadequate wages, benefits and contracts. Forced labor. Child labor.
We use seasonal or temporary workers.	Yes/No	Inadequate wages, benefits and contracts. Excessive overtime.
Some of the workers in my company are migrants from another area.	Yes/No	Forced labor. Discrimination.
We provide a dormitory for some or all of our workers.	Yes/No	Lack of freedom of movement. Lack of clean adequate space. Excessive charges for the use of the dormitory.
There are security guards at our company.	Yes/No	Lack of freedom of movement. Harassment.
We are located in a free-trade zone.	Yes/No	Inadequate wages, benefits and contracts.
There is a large fluctuation in orders and/or seasonality of production.	Yes/No	Excessive overtime. No payment of overtime due to hour-averaging. Layoffs.
There is a labor shortage in my area.	Yes/No	Child labor.
There is no history of collective bargaining, unions or other forms of worker representation at our company.	Yes/No	Discrimination. Restriction on freedom of association and collective bargaining.
There is no procedure for workers to express their complaints (grievance mechanism).	Yes/No	Discrimination. Disciplinary abuse and harassment. Worker injuries and chronic conditions.
The organization has a history of collective dismissal(s) in the past or may be vulnerable to collective dismissal due to poor financial conditions or technical reasons.	Yes/No	Discrimination. Inadequate retrenchment procedures leading to termination payments and benefits that do not comply with national law.
Large equipment, such as tractors or front-end loaders, is used in our operations.	Yes/No	Worker injuries and chronic conditions.
We have significant amounts of dust in the work zone (dust in an animal rearing facility may contain feed particles, animal or rodent fecal dust, pollen, bacteria, shed skin cells, mould, insect parts, etc.)	Yes/No	Exposure to pathogens resulting in chronic conditions.
Our activities involve workers routinely interacting with machinery, equipment with sharp edges and/or slippery work surfaces.	Yes/No	Worker injuries and chronic conditions.
We have not identified all operations that require personal protective equipment (PPE). Not all workers are aware of the workplace hazards and	Yes/No	Worker injuries. Exposure to hazardous material and chronic conditions.



## 2. Identification of Risks and Impacts

how to use the appropriate PPE.		
Our production activities involve hazardous materials or processes that could cause fires or explosions.	Yes/No	Worker injuries or casualties.
Our production area includes enclosures with large animals.	Yes/No	Worker injuries or casualties.
Our production area includes confined spaces.	Yes/No	Worker injuries or casualties.
Our operations include significant handling of animals by our workforce.	Yes/No	Worker injuries or casualties.
Electric powered pressure washers are used in our operations.	Yes/No	Worker injuries or casualties due to electrocution.
Our activities include significant lifting, carrying or repetitive motions.	Yes/No	Worker injuries and chronic conditions.
There are processes that involve lifting of heavy loads (e.g. lifting of animal feed, lifting during weaning, etc.)	Yes/No	Worker injuries and chronic conditions.
We have operations/areas with high noise levels (e.g. swine in confinement at feeding may have a noise level of 121 dB to 133 dB)	Yes/No	Hearing impairment.
Our production activities involve the handling of living and dead animals that can transmit diseases to humans.	Yes/No	Zoonotic diseases.
Our production activities involve the handling of animal blood, urine or feces without proper personal protection.	Yes/No	Zoonotic diseases.
Our workers don't have access to separate and clean areas for eating and changing clothes.	Yes/No	Worker illnesses.
Bathrooms are not properly cleaned and often lack running water, soap and toilet paper.	Yes/No	Worker illnesses.
Our primary suppliers would probably answer "Yes" to most of the questions above.	Yes/No	All of the above.

ENVIRONMENTAL RISKS		
RISK FACTORS	My company has the following conditions (circle the appropriate answer)	Potential negative impact (A "yes" response means that there is a potential negative impact)
Our operations require large quantities of fresh water.	Yes/No	Groundwater depletion in the region. Contamination of ground or surface water sources in the region due to discharge of effluent. High energy consumption for treatment of raw or processed water.
We don't have sufficient fresh water supplies to meet our requirements.	Yes/No	Local and regional groundwater depletion.
Our operations have high requirements for power supply.	Yes/No	High energy consumption.
We require large quantities of fuel (gas/diesel/coal/etc.) for our operations (e.g. hot water, heating, etc.).	Yes/No	Air emissions. Solid waste (fly and bottom ash if coal is used).
We have various process and utility	Yes/No	Air emissions. Solid waste (e.g. waste from



## 2. Identification of Risks and Impacts

equipment which may generate air emissions (e.g. boiler, diesel generator set, incinerator, grinder, etc.).		equipment maintenance, fly and bottom ash from coal-based boilers). Hazardous waste (e.g., waste oil, oil-soaked filters and rags). Liquid waste (e.g. boiler blow-down, waste oil). Noise generation.
We need to store large quantities of fodder and animal feed materials at site.	Yes/No	Solid waste due to possible contamination or deterioration of animal feed. Gaseous or liquid emissions leading to water contamination due to fodder/animal feed degradation.
We have feed grinding operations at site.	Yes/No	Dust generation. High noise levels at work zone.
We generate large (or significant) quantities of solid or liquid waste due to cleaning operations (e.g. manure).	Yes/No	Solid waste. Liquid waste. Contamination of land, groundwater and/or surface water due to improper disposal of solid and liquid waste. Wastewater from cleaning. Energy and water consumption due to pressure washing.
We generate large (or significant) quantities of solid or liquid waste from packaging material, waste feed, pesticides, ventilation filters, used/spoilt medications.	Yes/No	Solid waste. Liquid waste. Contamination of land, groundwater and/or surface water due to improper disposal of solid and liquid waste.
We have large manure collection and storage systems (e.g. belowground tanks, above-ground tanks, earth-banked lagoons, weeping wall stores, etc.).	Yes/No	Solid waste. Liquid waste. Contamination of land, groundwater and/or surface water due to improper storage or leakage of solid and liquid waste. Emission of toxic gases and odor (e.g. ammonia, H <sub>2</sub> S, etc.). Exposure to wildlife and local communities.
We use the manure as fertilizers or provide it to the local communities who can use it as fertilizers.	Yes/No	Land contamination. Ground or surface water contamination.
Animal mortality is high and animal carcasses are generated that need to be disposed.	Yes/No	Solid waste. Contamination of land, groundwater and/or surface water due to improper disposal of animal carcasses.
We dispose of our solid waste in our landfill or city's landfill facility.	Yes/No	Contamination of land, groundwater (due to leachate) and/or surface water (due to runoff). Impact on wildlife or fisheries. Diseases through vectors. GHGs generation (e.g. methane).
Our personnel, vehicles or farm animals move from one farm to another.	Yes/No	Contamination or spread of animal diseases (epizootics and zoonotic diseases).
We generate large (or significant) quantities of wastewater(e.g. runoff from feed including silage, livestock housing, feeding and watering, floor cleaning, etc.).	Yes/No	Contamination of ground and/or surface water due to improper disposal of wastewater.
We discharge our wastewater (process effluent) in a nearby river/lake/or any other water body.	Yes/No	Contamination of receiving water body and aquatic life (high BOD <sub>5</sub> , COD, TSS). Eutrophication.
We treat our wastewater (process effluent) before discharge.	Yes/No	Energy consumption. Solid waste generation (e.g. sludge from treatment process). Land and/or water contamination due to improper disposal of waste.
We treat our sewage (from toilets, washrooms, etc.) before discharging it in the city's sewer line.	Yes/No	Energy consumption. Solid waste generation (e.g. sludge from treatment process). Land and/or water contamination due to improper disposal of solid waste.





## 2. Identification of Risks and Impacts

We utilize our treated wastewater (process effluent) for irrigation (either by ourselves or provide it to community).	Yes/No	Contamination of land, groundwater (due to leachate), surface water (due to run-off) and/or crops if toxic chemicals are present in the treated wastewater.
We generate some hazardous or toxic waste (e.g. expired veterinary drugs, waste chemicals, used/waste oil/sludge from wastewater treatment plants based on chemical treatment, etc.).	Yes/No	Contamination of land, groundwater (due to leachate) and/or surface water (due to run-off) if disposed improperly.
We require a large land area for our industrial operations.	Yes/No	Loss of natural habitats or agricultural land. Air, water and/or land pollution based on expansion requirements and infrastructure development.
Our operations may have an impact on the surrounding forest or wildlife (e.g. overgrazing, land degradation, etc.).	Yes/No	Loss of native species. Impact on biodiversity.
We use some banned/controlled chemicals/materials in our processes.	Yes/No	Non-fulfillment of regulatory requirements. Air, land or water pollution depending on current usage. Exposure of workers or consumers to banned chemicals. Food safety.
We face problems related to pests/vectors.	Yes/No	Use of chemicals. Chemical exposure to workers. Land or water contamination due to improper disposal of pesticides containers.

### COMMUNITY HEALTH, SAFETY AND SECURITY RISKS

RISK FACTORS	My company has the following conditions (circle the appropriate answer)	Potential negative impact (A “yes” response means that there is a potential negative impact)
Our production activities involve treatment of animals with antibiotics or other growth promotants that may result in contamination of meat, water or crops (from manure usage as fertilizer).	Yes/No	Food contamination/food safety issues.
Our production activities and treatments involve generation of solid and liquid wastes (e.g. manure, urine, etc.) that may lead to odors.	Yes/No	Exposure of community to odors, pathogens and toxic emissions (e.g. ammonia, H <sub>2</sub> S, etc.).
We use certain banned chemicals, pesticides and other hazardous substances in our operations.	Yes/No	Exposure of community to banned chemicals/hazardous substances. Water and land contamination. Impact on wildlife.
Our operations involve air emissions, water discharge, solid waste disposal, leakage of chemicals or gases, etc. (e.g. lagoons, manure collection and storage systems), that may affect the surrounding community.	Yes/No	Air, water or land contamination, which can affect the health and livelihood of local communities.
We plan to develop new infrastructure, buildings, equipment and other facilities.	Yes/No	Exposure of communities to air emissions, noise and accidents due to equipment and vehicular movement. Impact on wildlife, biodiversity and local livelihoods due to natural habitat conversion.
Our production activities involve treatment of animals with antibiotics or	Yes/No	Food contamination/food safety issues.



## 2. Identification of Risks and Impacts

<b>other growth promotants that may result in contamination of meat, water or crops (from manure usage as fertilizer).</b>		
<b>We plan to decommission and dispose of old infrastructure, buildings, equipment and other facilities.</b>	Yes/No	Health risks to communities due to exposure to toxic substances (e.g. from chemicals, heavy metals, asbestos, etc.), and air emissions and noise due to equipment and vehicular movement. Impact on wildlife and biodiversity.
<b>There is significant movement of vehicles in and around our facility due to our operations (e.g. vehicles transporting livestock, feed manufacturing and supply to farms, movement of water tankers, etc.).</b>	Yes/No	Exposure of communities to air emissions, noise and accidents due to vehicular movement.
<b>We store hazardous material or hazardous waste in our facility.</b>	Yes/No	Health risks to communities and negative impacts on wildlife and biodiversity due to unintentional (spills) release of hazardous or toxic substances contaminating air, land and/or water.
<b>We discharge water from our operations, which may have an impact on surrounding water bodies (e.g. treated wastewater, accidental discharge from lagoons, overflow from lagoons during rainy season, etc.).</b>	Yes/No	Negative impacts on local food security and income generation due to contamination of aquatic life. Illness among local communities due to the use of contaminated water.
<b>We hire temporary and migrant workers.</b>	Yes/No	Communicable diseases brought or spread by the influx of workers.
<b>We hire private security personnel community.</b>	Yes/No	Conflicts with communities and indigenous people.
<b>Our operations have close proximity with the local community.</b>	Yes/No	Our operations have close proximity with the local community.



## 2. Identification of Risks and Impacts

### Process Mapping Tool

#### Instructions:

A process map or flowchart visually describes the flow of activities of a process, from beginning to end. Below is a template for developing a process map for your operations.

Please refer to the process map developed for the sample case study **ABC** (ABC Chicken Company) in Section II of this Toolkit to see how this can be developed and followed through.

While developing the process map, you need to identify all activities/processes/departments and the inputs (feed materials, water, heat, medicines/antibiotic) and outputs (waste, air emissions) from each of these activities.

Process maps are particularly useful in identifying environmental risks, occupational health and safety hazards and areas for process improvement. They are also helpful to identify whether you can improve the work flow, which can benefit the workers and improve the operational efficiency.

After you write down your process map, look at each activity and think of:

- the occupational health and safety hazards;
- the environmental, social and community risks; and
- the opportunities for waste reduction and resource conservation (water, energy and raw material/animal feed).

It is very important that people at all levels in your company participate in the identification of risks, opportunities and possible solutions. Supervisors and workers are a valuable resource in helping you learn about the way things actually work on the farm. If you can't have all the necessary people in a room, you can ask supervisors to consult with the workers in their area and provide information about the activities they oversee.

After you have identified the risks and opportunities for each step, you can think of the possible solutions. These can range from simple operational improvements to modifying or installing new equipment; from revising your work procedures for risk control to improving the use of personal protective equipment by your workers. This will form the basis of the action plans you will prepare (see Chapter 3. *Management Programs – Toolkit*).



## 2. Identification of Risks and Impacts

Inputs	Process	Outputs	Potential Negative Impacts - OHS	Potential Negative Impacts - Environment And Community	Opportunity For Waste Reduction/Energy & Water Savings
Materials, labor, resources	Operational activity	Product, waste, by-product	Injuries, long-term illness	Discharge, contamination, pollution, shortage	Improved process, re-purposing and recycling by-products



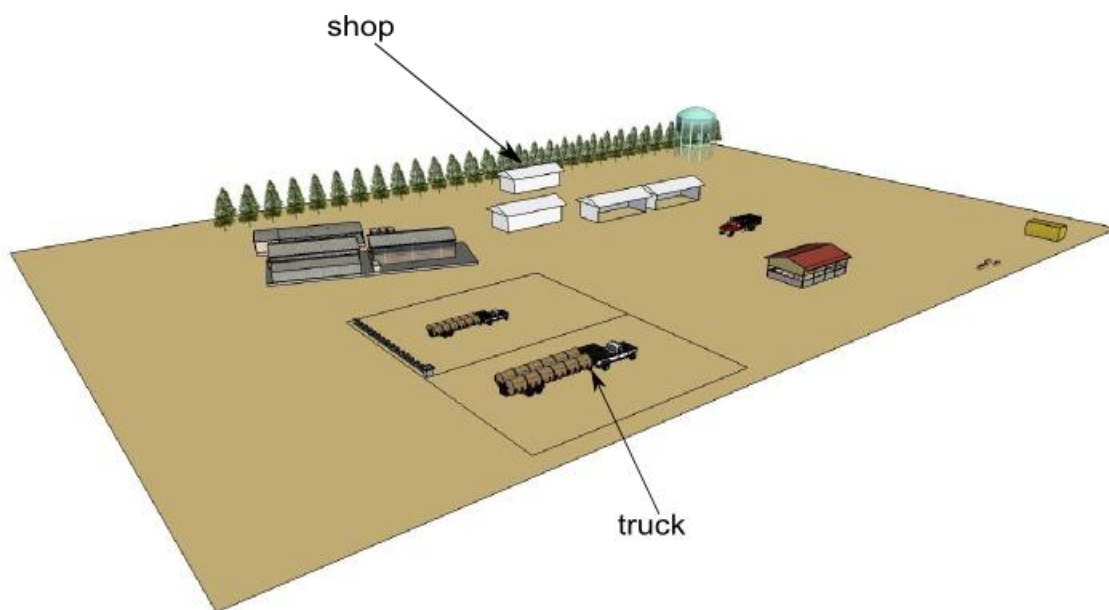
## 2. Identification of Risks and Impacts

### Physical Mapping Tool

#### Instruction

Prepare a map of the layout of your animal farm. The map should include all activities, processes and operations, as well as buildings and equipment, including the utilities, waste handling and treatment facilities. You can use this map again later when you develop your emergency preparedness plan. Once you have the physical map, do a walk-through to observe existing or potential problems.

Whenever you encounter a problem, write it down and mark it on the map (see example for sample case study of XYZ Livestock Company in Section II of this Toolkit). The walk-through should be conducted during working hours with a team that includes supervisors and workers, since they often know what the problems are and have ideas about necessary improvements.





## 2. Identification of Risks and Impacts

### HERE ARE SOME THINGS TO LOOK FOR:

#### OHS

- Where and how are people most likely to become injured (e.g. injury from animals, falls, cuts, burns, strains, exposure to hazardous substances and toxic gases)? Identify trip, slip and fall hazards - wet floors, obstructions, etc. Identify electrical hazards – wet floors, power washers, etc.
- Identify potential hazards related to confined spaces (e.g. silos, manure tanks, etc.) or work at height (e.g. water tanks), etc.
- Are all animal enclosures unobstructed and equipped with “man gate”?
- Are all alleyways clear and unobstructed and have no distraction for animals?
- Are exit doors unobstructed, unchained and well-marked? Are they equipped with panic bars to allow escape from within but deny access from outdoors?
- Are any passages blocked due to the facility layout or improperly stored materials?
- Is the farm laid out efficiently to reduce worker strain and workspace clutter?
- Are work spaces/animal sheds designed to maintain good working space and to avoid overcrowding of animals?
- What are the operations and activities where workers could be exposed to animal blood, urine or feces?
- Where could explosions, fires or the accidental release of hazardous materials occur? Is there adequate and appropriate response equipment close to those areas?
- Are chemicals labeled and stored with compatible materials, where combustion or cross-contamination cannot occur? What is the likelihood and consequence of an accidental spillage?
- Are there existing or potential leakages from rusted pipes, gaskets and drums?
- Where are workers exposed to odors, loud noises, excessive dust or extreme high and low temperatures? Do workers have appropriate personal protective equipment? Are they using it correctly?
- What are the areas/operations with significant dust (feed particles, animal or rodent fecal dust, pollen, bacteria, moulds, shed skin cells, etc.)?

#### Resource Efficiency

- Where are there high levels of water consumption or discharge? Identify all water outlets, hoses, etc. and flag those without spring closures. Basins, sinks and tubs should only be filled to needed levels.
- Where is most of the waste produced and what is done with it?
- Are waste treatment facilities adequate and operating efficiently?
- Are fodder, hay rolls and other animal feed stored appropriately to prevent wastage, spillage and contamination?
- Are animal feed materials/medicines being used most efficiently? Where are materials being



## 2. Identification of Risks and Impacts

wasted?

### Pollution

- Are the drainage systems/manure collection systems adequate to prevent leakage, overflow and contamination of the surrounding environment?
- Are manure pits and surrounding areas ventilated, cleaned and maintained to protect from leakage and accidental overflow?
- What are the current practices that may lead to contamination of air, water or solid materials?
- What are the activities and operations that may affect local communities?
- What are the likely impacts that may result in conflict with local communities?
- In general, are there places or work processes where it is clear there are bad habits?

After the walk-through, meet with the team and discuss what has been observed. Also, talk about previous incidents or accidents that have occurred in the plant and what have been the consequences.

The information you collect in the walk-through will form the basis of the action plans you will prepare (see Chapter 3. *Management Programs – Toolkit*).



## 2. Identification of Risks and Impacts

### Risk Assessment Form

#### Instructions

It might not be feasible or practical to address every risk. Where it is necessary to prioritize your actions, try to avoid or minimize the most potentially severe risks.

Complete this form based on the risks that you identified using the previous tools. Identify the probability of a certain risk occurring and the severity if it did happen. For example, a major explosion may be unlikely to occur (low probability), but the damage to your people and facility could be extremely high (high impact).

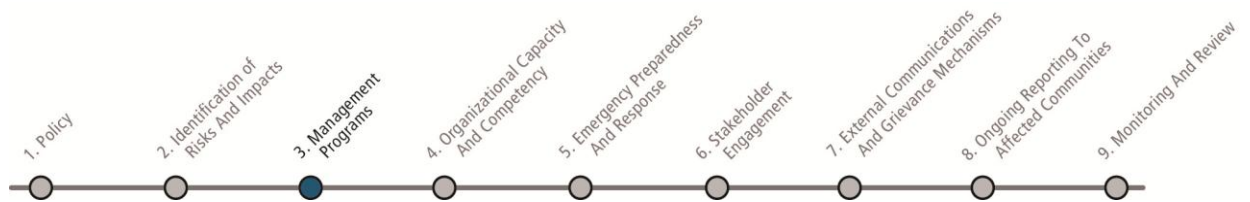
When prioritizing issues to be addressed, consider opportunities for cost reduction through reduced water and energy consumption, reduced waste generation and similar considerations.

COMPANY AREA OR DEPARTMENT	RISK	PROBABILITY OF OCCURRING (low, medium, high, extreme)	SEVERITY IF OCCURRED (low, medium, high, extreme)	NOTES





## 3. Management Programs



# Management Programs

## Introduction

A management program is centered on the action plans and improved procedures to help you to avoid, minimize or compensate for the risks and impacts you've identified.

We present three tools related to this element:

- Action Plan Chart
- Outline of Procedure
- Sample Procedure - Flowchart

Refer to case **ABC** and case **XYZ** in Section II of this Toolkit for an illustration of how these tools can be put to use.



## 3. Management Programs

### Action Plan Chart

#### Instructions

Use the Action Plan Chart to identify the actions you will take concerning the risks and how the actions will be managed. List each risk that you identified and prioritized in the previous section. Write down the actions that you could take to avoid, minimize or compensate/offset the risk. Assign a responsible party and a deadline. Identify the resources required and the operational procedures you will need to adopt.

#### Risk:

MITIGATION HIERARCHY	ACTION	OBJECTIVE AND TARGET	DEADLINE	RESPONSIBLE STAFF	RESOURCES REQUIRED	OPERATIONAL PROCEDURES
<b>Avoid</b>						
<b>Minimize</b>						
<b>Compensate / Offset</b>						



## 3. Management Programs

### Outline of Procedure

As you implement the Action Plan, it is helpful to define procedures that clearly systematize the actions into routine, daily processes and practices. Procedures can be text, flowcharts, pictograms – whatever you find to be the most effective communication tool for your company. Below is an outline of the important components of a well-defined procedure.

- Title:
- Procedure number:
- Number of pages:
- 1.0 Purpose:
- 2.0 Scope:
- 3.0 Definitions:
- 4.0 Responsibilities:
- 5.0 Work instructions:
- 6.0 Reference documents:
- 7.0 Records:
- 8.0 Approving authority:
- 9.0 Issue date:
- 10.0 Revision date:



## 3. Management Programs

### Sample Procedure – Flowchart








**Title:**

**Approving authority:**

**Date issued:**

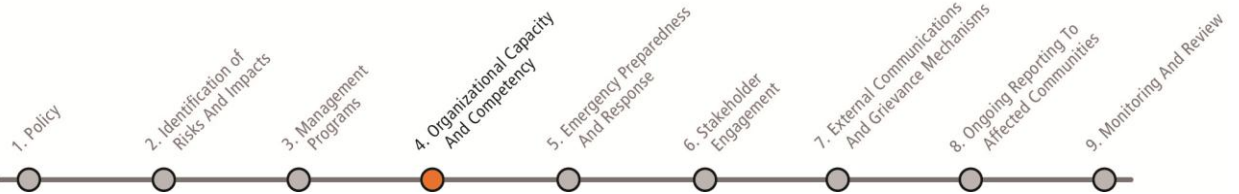
**Date revised:**

**Purpose:**

<u>Process</u>	<u>Responsible person</u>	<u>Documentation</u>
		
		
		
		
		
		
		



## 4. Organizational Capacity



# Organizational Capacity

## Introduction

A well-implemented ESMS is ultimately about trained, committed people. Senior management commitment is critical, but beyond that you need people throughout the company who take responsibility for the ESMS. This does not mean that the ESMS becomes everyone's full-time job. You should scale the system to meet your company's size and structure.

Remember that there needs to be a progression from awareness to commitment to implementation. Think about this as you plan the relevant training. For each training module, think about whether the goal is to raise awareness, gain commitment or give people the knowledge and skills they need to implement.

We present two tools related to this element:

- Training Plan Worksheet
- Roadmap and Time Estimate for Developing and Implementing an ESMS

Think about ways to adapt these for your company.



## 4. Organizational Capacity

### Training Plan Worksheet

#### Instructions

Look at your action plans and improved procedures to identify which training managers and workers will need to be able to correctly implement these. Identify who in the company will need basic and advanced training on the ESMS elements.

#### Sample Training Plan Worksheet

DEPARTMENT	MODULE 1	MODULE 2	MODULE 3	MODULE 4
Senior management				
ESMS team				
HR Department				
Production Department				
All workers and managers				



## 4. Organizational Capacity

A sample list of some of the relevant topics/items for the above specific group is presented in the table below. You should select the specific training modules for each of these target groups based on the specific risks and the potential improvement opportunities.

DEPARTMENT	RELEVANT TOPICS FOR TRAINING
<b>Senior management</b>	Introduction to ESMS; IFC Performance Standards; Sectoral best practices; Stakeholder engagement
<b>ESMS team</b>	ESMS elements; Identification and evaluation of risks and impacts; Monitoring and measurement of performance indicators; Stakeholder engagement; Internal and external communication; Environmental and social reporting; ESMS documentation; Internal auditing; Root cause analysis; Implementation of corrective and preventive actions
<b>HR Department</b>	Introduction to ESMS and Labor standards; Complaint management and resolution procedure; Hiring, non-discrimination, anti-harassment, remuneration and other social and labor policies; Worker interaction
<b>Production Department</b>	Introduction to ESMS; Supply chain assessment based on environment and social requirements; Supply chain audits; Controlled and banned substances; Customer requirements
<b>All workers and managers</b>	ESMS policies; Health and safety and emergency response procedures; Operational procedures; workers-management communication and grievance handling



## 4. Organizational Capacity

### Roadmap and Time Estimate for Developing and Implementing an ESMS

#### Instructions

The roadmap below lists the activities that a company commonly needs to put in place to set up an ESMS. This table will help you develop a timeline for action and estimate the staff time required to develop and implement your ESMS.

ACTIVITY		TIME SPENT				MONTH																							
						1			2			3			4			5			6								
1. Policy		Senior mgt time	Mid-mgt time	Supervisors time	Workers time																								
Developing	Kick-off meeting at senior management level to discuss ESMS implementation																												
	Selection (including communication/coordination) of ESMS core team (personnel from different key departments)																												
	Appreciation/awareness workshop for senior management and core team on ESMS requirements																												
	Review/upgrading of existing environment and social policy. Or formulation of organization's environmental and social policy																												
Implementing	Design, printing and display of ESMS policy in key areas																												
	Uploading of ESMS policy on company website																												
	Communication of ESMS policy to key external stakeholders																												
	Training and awareness-raising of employees on ESMS policy and information dissemination																												





# 4. Organizational Capacity

2. Risk and Impact Identification		Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTH																													
						1			2			3			4			5			6														
Developing	Mapping of activities, processes and key stakeholders, including the suppliers and contractors																																		
	Identification and compilation of regulatory and other requirements, including stakeholder expectations																																		
	Initial environment and social review, identification and evaluation of environment and labor risks (including supply chain)																																		
Implementing	Training and awareness of employees on environmental, social and labor risks and risks identification process																																		
	Training and awareness of employees on regulatory and other requirements, including stakeholder expectations																																		
	Training and awareness-raising of employees on environment, social and labor risks and information dissemination																																		



## 4. Organizational Capacity

3. Management Programs		Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTH																																			
						1				2				3				4				5				6															
Developing	Preparation of ESMS manual (formulation and documentation of procedures related to ESMS)																																								
	Formulation, compilation of environmental objectives/targets and social performance improvement measures																																								
	Formulation and development of environment and social action plans																																								
	Development of operational procedures																																								
Implementing	Communication, awareness-raising and training of employees on ESMS procedures																																								
	Communication and awareness of employees on environmental objectives and social performance improvement measures																																								
	Communication and awareness of employees on environmental and social action plans																																								
	Training of employees on environmental and social operational procedures																																								



# 4. Organizational Capacity

4. Organizational Capacity and Competency		Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTH																													
						1			2			3			4			5			6														
Developing	Environmental and social awareness program for middle management																																		
	Environmental and social awareness program for workers																																		
	Competency program for ESMS core team																																		
	Internal auditor training for the organization’s ESMS assessors/auditors																																		
Implementing	General awareness-raising and training on environment, social and labor issues/ESMS for senior and middle management																																		
	Environmental and social awareness program for workers																																		
	Competency program for ESMS core team																																		
	Internal auditor training for the organization’s ESMS assessors/auditors																																		



# 4. Organizational Capacity

5. Emergency Preparedness and Response		<i>Senior mgt time</i>	<i>Mid-mgt time</i>	<i>Supervisors time</i>	<i>Workers time</i>	MONTHS																							
						1				2				3				4				5				6			
Developing	Review key risks and existing emergency preparedness plan																												
	Upgrade/prepare the emergency preparedness plan																												
	Communicate to workers, potentially affected communities and relevant government agencies (if required)																												
Implementing	Raise awareness and communication to employees and affected communities on key risks and emergency issues and emergency planning																												
	Training of employees on emergency preparedness plan																												
	Communication and awareness-raising on emergency procedures to affected communities and relevant authorities (if required)																												

6. Stakeholder Engagement		<i>Senior mgt time</i>	<i>Mid-mgt time</i>	<i>Supervisors time</i>	<i>Workers time</i>	MONTHS																							
						1				2				3				4				5				6			
Developing	Mapping of all stakeholders, stakeholder analysis and engagement planning																												
	Develop/upgrade stakeholder communication/consultation; information disclosure and engagement strategy/program																												
Implementing	Communication to employees on key stakeholders and their environment and social/labor expectations																												
	Communication, awareness-raising and training of employees on the strategy/program for stakeholder engagement/ consultation/ communication and information disclosure																												



## 4. Organizational Capacity

7. External Communication and Grievance Mechanism		Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTHS														
						1		2		3		4		5		6				
Developing	Review external communication system, including receiving and handling feedback, concerns and complaints																			
	Develop/upgrade system for regular engagement, receiving, documenting and responding to feedback and grievances																			
Implementing	Review external communication, feedback, stakeholder concerns and complaints and communicate to key personnel																			
	Training, awareness-raising and implementation of stakeholder engagement, receiving, documenting and responding to feedback and grievances																			

8. Ongoing Reporting to Affected Communities		Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTHS														
						1		2		3		4		5		6				
Developing	Review existing system for reporting and disclosure																			
	Develop/upgrade system for external reporting and disclosure (including collection, validation and verification of information)																			
Implementing	Communication and disclosure to key external stakeholders and affected communities																			
	Communication, awareness-raising and training on external reporting and disclosure (including collection, validation and verification of information)																			

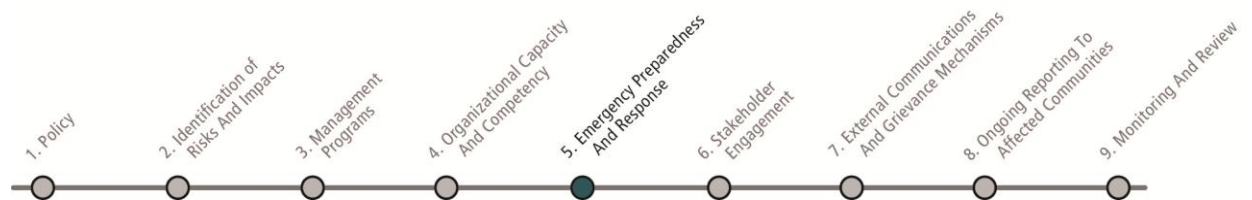


## 4. Organizational Capacity

9. Monitoring and Review		Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTHS																											
						1				2				3				4				5				6							
Developing	Establish procedure to monitor and measure ESMS performance, compliance and stakeholder requirements																																
	Implementation of ESMS monitoring program, establishing benchmarks and integration with existing system																																
	Final review and complete ESMS documentation																																
	Conduct internal audit/evaluation of ESMS performance against the management program requirement/benchmarks																																
	Establish relevant operational controls and formulation of corrective and preventive actions																																
	Review by the senior management to assess performance and effectiveness of ESMS																																
Implementing	Documentation and communication on ESMS conformance, regulatory compliance and stakeholder requirements																																
	Communication, awareness, training and implementation of ESMS monitoring program and established benchmarks																																
	Communication of internal audit/performance measurement findings and ESMS performance to the employees																																
	Communication, awareness and training of employees on operational controls and corrective and preventive actions																																
	Communication on outcomes of review of the ESMS performance by senior management and key decisions taken																																
	<b>TOTAL</b>																																



## 5. Emergency Preparedness and Response



# Emergency Preparedness and Response

## Introduction

Even with good systems in place, emergencies can and do happen. The key is to plan in advance — try to prevent as much as you can, and train your employees so they know what to do in case an emergency does happen. Don't be overwhelmed by the thought of planning for every single possible accident or emergency. Look at your risk assessment and focus on the areas where emergencies are more likely to happen or would cause significant harm. Develop and implement a suitable “emergency preparedness and management plan” for the identified emergency situation.

As part of the plan, you need detailed procedures for the steps to prepare and respond to an emergency. Some of the most common emergencies in the animal production industry are fire (in animal sheds/buildings, storage areas, barn); flooding; hurricane; exposure to toxic manure gases including hydrogen sulfide, ammonia, carbon dioxide and methane; and outbreak of epizootic diseases.

We present two tools related to this element:

- Sample Fire Response Procedure
- Sample Epizootic Disease Outbreak Response Procedure



## 5. Emergency Preparedness and Response

### Sample Fire Response Procedure for Livestock Farming

#### Title: Fire Response Procedure

Procedure number: EM001

Number of pages: 5 pages

#### **1.0 Purpose and Scope:**

- 1.1. **PURPOSE:** Set out responsibilities and activities in order to respond to an emergency resulting from incidents of fire affecting the workers and livestock at the farm. Identify the roles, responsibilities and authorities to effectively facilitate the site's emergency preparedness and response procedures.
- 1.2. **SCOPE:** This procedure applies to all activities and processes of at **[Name of Company]**.

#### **2.0 Definitions:**

- 2.1. **EMERGENCY:** Situation that poses immediate threat of:
  - a. injuries and damage to health;
  - b. human and animal fatalities;
  - c. damage to property; or
  - d. damage to environment.
- 2.2. **FIRE EMERGENCY:** Situation that poses or signals immediate threat in the form of:
  - a. uncontrolled fire or imminent threat of uncontrolled fire;
  - b. smoke or burning;
  - c. uncontrolled release or spillage of flammable or combustible substance; or
  - d. sounding of fire alarm.

**3.0 Responsibility and Authority:** This procedure is the responsibility of the operations manager or designate. The operations manager shall report to the president in matters related to emergency preparedness, and shall have total authority during emergency situations. The operations manager shall have the authority to declare a state of emergency. In the absence of the operations manager, these authorities shall revert to the president.

#### **4.0 Work Instructions:**

##### **4.1. FIREFIGHTING PROCEDURE**

- a. The cardinal rule in firefighting is to preserve life, and then property.
- b. Call for in-house assistance immediately upon discovering the fire. Do not enter a burning room or building without another qualified person to assist.
- c. Alert other employees immediately.
- d. Start with an inventory. What are you dealing with? Live animals? Deadstock? Both? How many?





## 5. Emergency Preparedness and Response

- e. Determine if the fire can be extinguished with the portable equipment in the building. If it can be used, do so. If not, call the fire department, activate an alarm and evacuate the area.
- f. The person discovering the fire should notify the telephone operator, giving exact location and nature of fire.
- g. The telephone operator will notify the following in turn:
  - i. engineering control room;
  - ii. Farm/operations manager;
  - iii. Vet/house doctor;
  - iv. Local emergency authority;
  - v. Safety manager/fire safety officer;
  - vi. Livestock holding facilities; and
  - vii. all other heads of departments; and
- h. The telephone operator will remain on duty as an information and control center unless instructions or condition dictate otherwise.
- i. The maintenance department or the plumber shall reach the fire hydrant pump room (if safe) for smooth pump operation.
- j. The emergency controller (operations manager or the shift in-charge) will take appropriate decisions regarding building evacuation, firefighting with the help of internal trained team and/or notifying the city's fire department.

4.2. **EVACUATION:** A quick decision and effective evacuation operation is of outmost importance in order to prevent loss of lives. The procedure of evacuation should be handled with expertise and without loss of time.

- a. Evacuation applies both for affected animals and the workers.
- b. Remember, all animals are unpredictable. Frightened animals are unpredictable and will react instinctively by running or fighting.
- c. Contact your local emergency management authority and evacuate the animals through pre-established evacuation routes.
- d. Shelter your animals at safe shelters for farm animals, such as fairgrounds, other farms, racetracks, and exhibition centers.
- e. Use portable loading ramps and pre-established safe transportation methods for animals. Ensure that you have access to trucks, trailers, and other vehicles suitable for transporting each type of animal, along with experienced handlers and drivers to load or unload animals.
- f. Employees and visitors should gather near the designated muster point in a safe area that is upwind from smoke or toxic gases and in an area that will not hamper emergency vehicles or services when they arrive.



## 5. Emergency Preparedness and Response

- g. A head count must be done to ensure that everyone (employees and visitors) is accounted for.
- h. Employees are not to re-enter the evacuated building until so advised by the designated officer (operations manager or safety manager).
- i. If a rescue operation is required for a trapped employee/visitor, it must be performed by trained and competent personnel equipped with suitable PPEs.
- j. If animals are evacuated to a centralized location for shelter, such as a fairgrounds, and will co-mingle with other animals of unknown health status try to:
  - i. Make sure your animals have sufficient identification (e.g. ear tags or brands) to be able to tell them apart from others.
  - ii. Minimize the contact among animals from different premises.
  - iii. Protect feed and water from contact with wild animals and birds. Verify the health and vaccination status of other animals.
- k. Make sure that you have adequate and safe fencing or pens to separate and group animals appropriately while evacuating and sheltering animals.

4.3. **MEDICAL AID FOR WORKERS:** Get first aid treatment for all minor injuries; first aid is only temporary. First aid is the immediate treatment needed before you get a doctor to the victim or the victim to a doctor. What you do in the critical moments after an injury occurs could save a life. Know the basic first aid procedures. Review them often so you will be prepared if you suddenly find yourself in an emergency situation. When someone is injured, it is essential to survey the scene and determine if the situation is safe, or if the victim must be moved from a dangerous location to a safer place. Call for emergency medical help immediately for all life-threatening situations. Send people to guide the emergency team to the victim.

### 4.4. **FIRST AID FOR FIRE INJURIES AND BURNS**

- a. Move patient to fresh air.
- b. Move the patient from the heat of fire.
- c. Do not allow crowding around the patient.
- d. Remove or cut away clothes from affected parts of the body.
- e. Open buttons and loosen clothing.
- f. Pour chilled water on the affected parts.
- g. Apply any antiseptic cream.
- h. Get a doctor.

4.5. **ASPHYXIA:** If the patient has difficulty breathing or there are symptoms of collapse:

- a. Give artificial respiration with respirator or mouth-to-mouth respiration.
- b. Give oxygen.
- c. Take the patient to the hospital or medical help.



## 5. Emergency Preparedness and Response

4.6. **SHOCK:** If the patient perspires, body is cold and has a low pulse:

- a. Cover with a blanket. (Do not touch burned parts.)
- b. Keep the victim lying down.
- c. Elevate feet if you do not suspect head or neck injury or leg fracture.
- d. Get medical help.
- e. Monitor vital signs.
- f. Prevent loss of body temperature.
- g. Take the patient to a hospital immediately.

4.7. **COMMON OBSERVATIONS FOR ASSESSING LIVESTOCK INJURIES**

- a. loss of balance or lack of coordination, staggering, circling
- b. stands away from the other animals
- c. glazed eyes, staring, drooping head - little interest in surroundings
- d. reluctance to move, inability to stand or difficulty standing or moving
- e. standing in rigid position
- f. pressing head against objects
- g. lameness, swollen limbs, or joints
- h. arching backs, up or down
- i. shivering
- j. drooping or cold ears
- k. excessive vocalization
- l. grunting
- m. grinding teeth (squeaking sound)
- n. bones protruding from the body
- o. open, bleeding wound
- p. Dealing with surviving animals/Relocating Animals
  - i. Uninjured animals should be moved to another barn or location.
  - ii. While relocating the animals, consider bio-security, space allowances, feed and water

4.8. **EUTHANASIA**

- a. Only trained personnel shall be allowed to carry out the euthanasia.
- b. Assess the animals and rank them according to those that need attention. Animals in pain with severe injuries or burns should be euthanized immediately.
- c. Smoke inhalation damage and chemical contamination are untreatable. Signs include singed hair, burns, noisy or difficulty breathing (shortness of breath), coughing, changes in vocalization, black or grey saliva, change in skin color or unconsciousness. These animals should be euthanized.



## 5. Emergency Preparedness and Response

- d. For euthanasia, select an appropriate firearm. A 22-caliber firearm is sufficient for most cattle, pigs and horses. A larger caliber such as a .308 should be used for large bulls, boars or bison. The muzzle should be held approximately 2 inches from point of entry, not flush with the skull.
- e. Make sure the animal is dead before walking away from it. Check for vital signs - pulse, breathing, etc. An animal will “wiggle” for 2-3 minutes following death.

### 4.9. DEADSTOCK DISPOSAL

- a. Rendering
  - i. Fire damaged animals are not acceptable for rendering. Call the deadstock removal company and insurance adjuster to assess the situation.
- b. Landfill
  - i. Pick-up and delivery to the approved disposal site (i.e. landfill) must be done through a licensed deadstock collector.
- c. On-farm burial or Composting
  - i. Deadstock should be buried or composted on site, with or without debris.
  - ii. Composting will require ongoing management. Ensure regular monitoring of the site to ensure compliance with deadstock and environmental regulations

**5.0 Emergency Response Team:** The purpose of the Emergency Response Team is to deal with catastrophic accidents within the company. The team’s responsibilities are to immediately meet when an emergency situation is reported and to determine the course of action.

### Emergency Response Team members

NAME	TITLE	HOME PHONE	CELL PHONE
	President		
	Operations manager		
	Shift-in-charge		
	Chief security officer		
	OHS manager		
	Firefighting team member 1		
	Firefighting team member 2		
	Firefighting team member 3		
	Neighbors		
	Veterinarian		
	Poison control		
	Local animal shelter		



## 5. Emergency Preparedness and Response

	Animal care and control		
	Transportation resources		
	Local volunteer organizations		
	Dead stock Removal		

***Emergency Response Team members may be called upon on short notice***

**6.0 Reference Documents:** Evacuation plan, plant map with locations of emergency exits, firefighting equipment and first aid stations.

**7.0 Records:** Training logs, drill logs, firefighting and medical equipment maintenance and inspection logs; water gauge and pressure inspections logs

**8.0 Approving Authority:** Operations manager

**9.0 Issue/Revision Date:** November 27, 2012



## 5. Emergency Preparedness and Response

### Sample Epizootic Disease Outbreak Response Procedure (for poultry farm)

#### Title: Epizootic Disease Response Procedure

Procedure number: EM001

Number of pages: 5 pages

#### **1.0 Purpose and Scope:**

- 1.1. The emergency response procedure will serve as a guideline in the event that a poultry farm experiences an emergency such as a reportable disease outbreak (e.g. avian influenza, exotic Newcastle disease, fowl typhoid and pullorum disease, etc.). This procedure sets out responsibilities and activities in order to respond to emergency resulting from outbreak of poultry diseases. It identifies the roles, responsibilities and authorities to effectively facilitate the site's emergency preparedness and response.
- 1.2. **SCOPE:** This procedure applies to all activities and processes of at **[Name of Company]**.

#### **2.0 Definitions:**

- 2.1. **EMERGENCY:** Situation that poses immediate threat of:
  - a. Outbreak of epizootic diseases
  - b. injuries and damage to health;
  - c. fatalities;
  - d. damage to property; or
  - e. damage to environment.
- 2.2. **NOTIFIABLE DISEASES:** Those diseases which are required by law to be reported to government authorities. The collation of information allows the authorities to monitor the disease, and provides early warning of possible outbreaks.
- 2.3. **REPORTABLE DISEASES:** Diseases that require action to control or eradicate because they are a threat to animal or human health, food safety or the economy.

**3.0 Responsibility and Authority:** This procedure is the responsibility of the operations manager or designate. The operations manager shall report to the president in matters related to emergency preparedness, and shall have total authority during emergency situations. The operations manager shall have the authority to declare a state of emergency. In the absence of the operations manager, these authorities shall revert to the president.

#### **4.0 Work Instructions:**

- 4.1. **POULTRY DISEASES**
- 4.2. **NOTIFIABLE DISEASES:** The company shall periodically review and engage with the local administration to update its requirements related to notifiable diseases. In the event of a notifiable disease, immediate contact should be made with the provincial veterinarian.
- 4.3. **REPORTABLE DISEASES:**



## 5. Emergency Preparedness and Response

- a. Reportable diseases outlined in the local regulations are important to human or animal health. The poultry farm shall maintain a list of all reportable diseases and provide training to its personnel on identification, reporting and dealing with the outbreak of a reportable disease.
  - b. The poultry farm is required to immediately report the presence of an animal that is contaminated or suspected of being contaminated with one of these diseases. Control or eradication measures will be applied immediately.
  - c. In the event of an outbreak of an epizootic disease, the goal of the poultry farm's emergency response is to prevent further spread of the disease and protect animal health.
  - d. Actions required if a poultry disease is suspected
- 4.4. **SUSPICION OF A DISEASE:** If there are significant unexplained changes in mortality or production, and a poultry disease is suspected, the company shall administer a self-quarantine procedure, request the assistance of the company's poultry veterinarian and/or submit appropriate samples to a veterinary diagnostic laboratory. To ensure that samples yield the best possible results, they must be handled in a way that prevents contamination and preserves the viability of the causative organism.
- 4.5. **SELF-QUARANTINE PROCEDURE**
- a. Collect all flock documentation (production, health and mortality records).
  - b. Call veterinarian with a description of the problem, time of onset and duration (maintain necessary records).
  - c. Submit birds or samples for diagnostic examination by having the veterinarian on-farm for necropsy and sampling collection or by submitting birds/samples to a veterinarian or diagnostic laboratory (maintain necessary records).
  - d. Follow all veterinary advice regarding interim treatment of the flock.
  - e. Keep disease suspicion confidential until diagnostic confirmation is received, with the exception of courtesy calls to processors, feed companies, etc., whom must keep information confidential.
  - f. Contact appropriate local administration authorities.
  - g. Immediately restrict all traffic on farm and implement enhanced biosecurity measures
  - h. Cancel or postpone farm appointments, arrange end-of-day deliveries or pick-ups with mandatory vehicle disinfection, lock gates, service affected barns last and if possible, dedicate one employee to affected barn(s).
  - i. Dispose of dead/culled birds on farm (composting/incineration) and treat as infectious material.
  - j. Review and update on-farm traffic records: visitor log book, previous bird movement.
  - k. If a reportable disease is confirmed, appropriate regulatory authority will be contacted.



## 5. Emergency Preparedness and Response

- l. Follow all directions/recommendations of the local authorities and the poultry veterinarian.
- m. Keep well maintained records of the incident.
- n. Direct all media inquiries to the designated official at the farm.

### 4.6. PROCEDURE FOR DIAGNOSTIC SUBMISSION:

- a. Step 1: Sample Collection
  - i. Provide all information, visitor logbooks and health records and flock history.
  - ii. Include a complete description of the problem (mortality, production drop, reduced water consumption, etc.), including date/time of onset, duration, extent (percentages) and whether things are getting worse or better over a defined period of time.
  - iii. Offer your suspicions as to what you think the problem might be.
  - iv. Submit a sample from your flock of birds.
  - v. Record submission date & reference number.
  - vi. Blood and tissues samples should be clearly labelled and placed in a closed plastic baggie.
  - vii. Swabs should be appropriate for the testing requested. Example: bacterial culture swabs for Staphylococcus, pooled dry swabs for lab analysis. Please call the testing laboratory if unsure.
  - viii. Dead birds should be dead for less than 24 hours and kept chilled if you are going to use the birds for sample.
  - ix. Live birds must NOT be submitted.
- b. Step 2: Sample Submission
  - i. The company's veterinarian shall visit the farm and provide a tentative diagnosis and submit the appropriate samples.
  - ii. The veterinarian shall take the appropriate samples (dead/affected birds or blood/tissue samples) and submit them directly to the provincial veterinary diagnostic laboratory. When transporting a diagnostic sample, it must be packaged to prevent the potential spread of infectious disease.
- c. Step 3: Initial Control Measures
  - i. During the interim between submission and preliminary test results, the company's veterinarian shall recommend initial treatment based on suspected diagnosis formed from the clinical evaluation.
  - ii. The treatment suggested by the company veterinarian shall be modified as new test results become available.





## 5. Emergency Preparedness and Response

- iii. Ensure on-farm biosecurity protocols are being followed and suspend all unnecessary traffic.

4.7. **EPIZOOTIC DISEASE CONFIRMATION:** If the birds have tested positive for an epizootic disease, the poultry farm will be depopulated. Flocks will be humanely destroyed on the farm. Whenever possible, poultry carcasses, poultry products, manure and feed from the infected will be composted or buried on site. All infected premises shall be cleaned and disinfected by the company's trained professionals.

- a. **Disposal of Infected Birds:** Disposal methods for infected birds and materials shall be periodically reviewed to ensure compliance with the local regulatory requirements. On-site or off-site disposal shall be done in consultation with the veterinary and environmental officer.
- b. **On-Site Disposal**
  - i. In-barn composting
  - ii. Burial
  - iii. Air-forced burning in a pit or container
- c. **Off-site disposal shall be when disposal on the infected premise is not possible. Methods include:**
  - i. Rendering
  - ii. Burial or burning at a landfill site
  - iii. **Additional requirements for off-site disposal options include:**
    - 4.7.c.iii.1. Carcasses must be sprayed with disinfectant prior to removal
    - 4.7.c.iii.2. Biosecure transport of material following an approved specific route with the appropriate permit(s) and authorization
    - 4.7.c.iii.3. Cleaning and disinfecting equipment must be available at the disposal site so the vehicle can be properly decontaminated immediately after unloading
    - 4.7.c.iii.4. Rendered product cannot be used in livestock feed and must be disposed of by burial, incineration or composting

4.8. **ADDITIONAL BIOSECURITY MEASURES:** When there are no suspected poultry disease cases at the poultry farm but a poultry disease is known or suspected in the vicinity of the farm:

- a. The company veterinarian shall watch the flock and report any unusual illness or mortality.
- b. The Operation Manager shall record all movement and all visitors on and off the farm, not just within the barns or restricted areas.
- c. The Operation Manager shall review all biosecurity requirements and strictly adhere to them.
- d. Restrict movement on and off the farm, including individuals and family.



## 5. Emergency Preparedness and Response

- e. Eliminate or delay all activities that if undertaken, could act as a vector to spread disease. Avoid direct contact with off-farm poultry or poultry personnel.
- f. No other farms shall be visited. Do not visit locations of common attendance (coffee shops).
- g. Make courtesy calls to suppliers, utility companies, and service providers listed on the emergency contact list so they can implement their own biosecurity procedures.
- h. Delay or reduce all service and other farm visits and take extreme caution when allowing necessary visits.
- i. Drivers must not enter barn(s) and must reduce foot travel to absolute necessity.
- j. Drivers must wear plastic boots (or similar) and deposit them at the farm when leaving.
- k. Hand disinfecting, or vigorous washing with warm water and soap prior to leaving is desired.
- l. Truck tires and wheel wells must be sprayed with a disinfectant prior to entering and exiting your premises. If a truck passed through a potentially infected zone, the driver will proceed to a truck wash where the tires, wheel wells and undercarriage will be cleaned and sprayed with a disinfectant. A disinfectant spray must be applied inside the truck cab to areas such as the floor, steering wheel and door handles prior to returning to base or going directly to another poultry farm.
- m. Family members attending activities away from the farm (work, school) should limit access to the barn and follow strict biosecurity protocols to eliminate risks. They should avoid contact with any other feathered species including pet birds.
- n. Limit flock management to specific individuals. Designated clothing including footwear should be utilized for each barn. Take special care that no equipment enters or leaves the barn area unless thoroughly cleaned and disinfected. Hand disinfecting or vigorous washing with warm water and soap is also recommended prior to leaving the barn.
- o. Make certain other animals such as dogs and cats do not enter the barn or have contact with dead birds. Consider confining these animals at this time.
- p. Confinement of mortalities to the farm is recommended until the situation is clear. Dead bird disposal should strictly follow guidelines as outlined by the local regulations. The use of freezers or alternate containment is preferred.
- q. Ensure you have a supply of consumable items such as extra coveralls, boots, barrier tape, disinfectant, or other similar supplies.

**5.0 Emergency Response Team:** The purpose of the Emergency Response Team is to deal with FAD outbreaks in the company. The team's responsibilities are to immediately meet when an emergency situation is reported and to determine the course of action.



## 5. Emergency Preparedness and Response

### Emergency Response Team members

NAME	TITLE	HOME PHONE	CELL PHONE
	President		
	Operations manager		
	Shift-in-charge		
	Chief security officer		
	Poultry Vet		
	Poultry Scientist		
	Catching crew		
	Environment Manager		
	OHS Manager		
	Equipment repair		
	Insurance company		
	Local Municipality Office		
	Diagnostic Centre		
	District Veterinary Officer		

*Emergency Response Team members may be called upon on short notice*

**6.0 Reference Documents:**

**7.0 Records:** Training logs, drill logs

**8.0 Approving Authority:** Operations manager

**9.0 Issue/Revision Date:** November 27, 2013



## 6. Stakeholder Engagement



# Stakeholder Engagement

## Introduction

Your company interacts with many different groups of stakeholders. A stakeholder is any person or organization that has an interest in or is affected (or perceives to be affected) by your company. Engaging with stakeholders will help you understand how to avoid or minimize any negative impact and reduce the risks to your business from anti-company sentiments and negative campaigns that could affect your company's reputation.

We present three tools related to this element:

- Stakeholder Mapping Tool
- Impact Zoning Tool for Identifying Affected Communities
- Stakeholder Engagement Plan Worksheet

Refer to case **ABC** and case **XYZ** in Section II of this Toolkit for an illustration of how these tools can be put to use.



## 6. Stakeholder Engagement

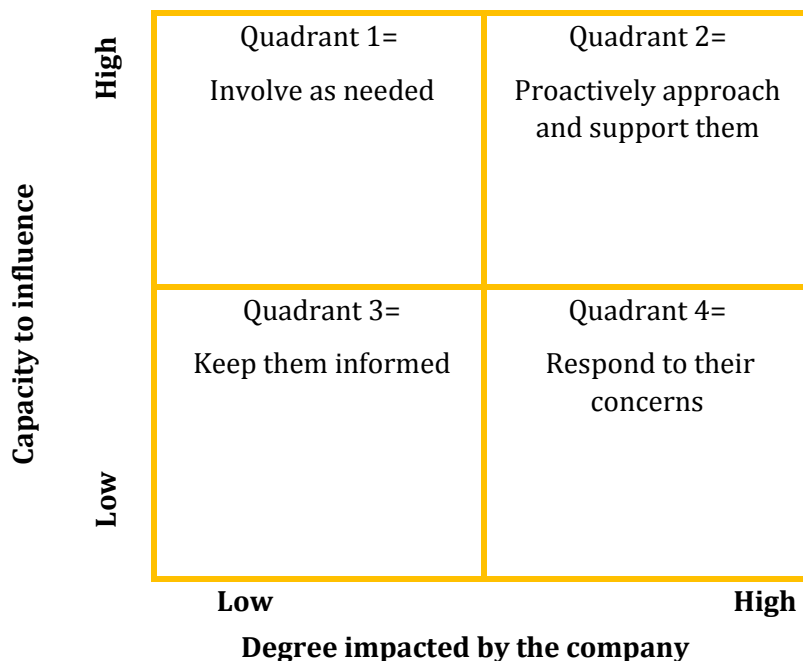
### Stakeholder Mapping Tool – Identification and analysis

#### Instructions

1. Ensure you have a cross-functional/departmental team to start the exercise.
2. List relevant stakeholders for your company (e.g., those directly and indirectly **affected** by your company, those that have an **interest** in your company operations, those that have an ongoing relationship with the company, and those that have the ability to influence your company operations). Provide as much detail as possible (i.e. name your main suppliers independently; disaggregate communities by identifying local leaders or other relevant actors).
3. Next to each stakeholder group, discuss and list their key concerns, issues, interests.

STAKEHOLDER	ISSUES/CONCERNS/INTERESTS

4. Place these stakeholders on the stakeholder map according to the degree to which they are impacted by your operations and their capacity to influence your company operations.



5. Classify stakeholders according to their current relationship with the company: **supportive, supportive with conditions, neutral, negative**. The purpose of stakeholder engagement is to keep supportive stakeholders happy and help address the concerns of less-supportive stakeholders.



## 6. Stakeholder Engagement

Remember that stakeholders' relationships with the company may change over time. We recommend that you analyze their current position to the company.

6. Identify the groups that represent a high priority for engagement.
7. Define strategies to engage with the prioritized stakeholders. When defining engagement strategies, keep in mind current initiatives of the company. Engagement strategies should be differentiated, based on where stakeholders are located on the map:
  - Quadrant 1: Involve them as needed
  - Quadrant 2: Proactively approach and support them
  - Quadrant 3: Keep them informed
  - Quadrant 4: Respond to their concerns
8. Review the stakeholder map at regular intervals and when there are major changes. It is advisable to review the stakeholder map with external groups to get their feedback.



## 6. Stakeholder Engagement

### Impact Zoning Tool for Identifying Affected Communities

#### Instructions

The term “affected communities” includes any individuals or communities that are located in proximity to the company’s facilities and are directly exposed to actual or potential adverse impacts on their environment, health and livelihood due to company activities.

A quick and practical technique for identifying affected communities is the “impact zoning map” (see box below). By mapping the sphere of influence of different types of environmental and social impacts, the company can begin to identify distinct groups by impact area, and can then prioritize the stakeholders for consultation.

While priority should be given to individuals and groups who are directly and adversely affected, drawing a line between who is affected and who is not can be challenging. Communities lying just outside of the designated impact area can perceive impacts or feel they have been arbitrarily excluded from the engagement process.

#### HOW TO IDENTIFY STAKEHOLDERS THROUGH IMPACT ZONING

1. Draw a sketch map (see figure below as an example and case study **ABC** in Section II for an illustration of how to complete it) of the key operations at the animal farm, both on- and off-site, that may give rise to local environmental and social impacts (e.g. the project site; ancillary infrastructure such as roads, water supply; sources of air, water and land pollution). This may be performed more efficiently by using aerial photographs or satellite images.
2. Identify the broad impact zones for each of these components (e.g. the area of land, air and water pollution receptors, etc.).
3. After identifying and mapping broad stakeholder groups, overlay those groups with the impact zones.
4. Through consultation with relevant stakeholder representatives, verify which groups are potentially affected by which impacts.

*Source: Doing Better Business Through Effective Consultation and Disclosure. IFC (1998).*



## 6. Stakeholder Engagement

### Stakeholder Engagement Plan Worksheet

#### Instructions

After the identification of your most important stakeholders, the next step is to develop a plan for how to engage with the groups that you listed. Engagement should be stronger and more frequent with those groups that are most affected and those that have a greater ability to influence your business.

At a minimum, you should always implement an external communication procedure to receive communications from the public and accordingly adjust your management program. In the presence of adversely affected stakeholders, you should implement a grievance mechanism and actively engage them in consultation, regularly disclosing clear and meaningful information and providing communities with opportunities to express their concerns and suggestions. Finally, you should report back to them on the actions your company has put in place to address the issues identified during the process of consultation.

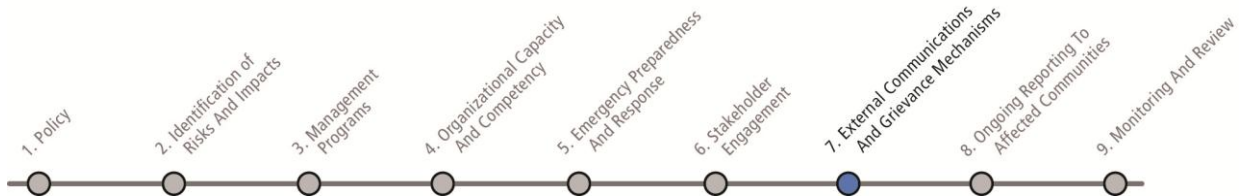
The table below provides example of some stakeholders that may be associated with your operations. Once you have done the stakeholder mapping and identified their concerns, you may start looking at the other necessary information, such as the engagement method, information to be disclosed or reported back to your stakeholders, and the key information you would like to obtain.

STAKEHOLDER ENGAGEMENT PLAN				
Stakeholder	Concerns	Engagement method	Information to disclose and report back	Most valuable info to obtain
Employees (Quadrant xx)				
Contract workers (Quadrant xx)				
Local community (Quadrant xx)				
Consumers (Quadrant xx)				
Suppliers (Quadrant xx)				
Contractors (Quadrant xx)				
Regulators (Quadrant xx)				
NGOs (Quadrant xx)				
Media organizations (Quadrant xx)				
Etc.				





## 7. External Communication and Grievance Mechanism



# External Communication and Grievance Mechanism

## Introduction

### Grievance Mechanism

The purpose of a grievance mechanism is to establish a way for an individual or group within an affected community to contact you if they have an inquiry, concern or formal complaint. It provides people with an alternative way of communicating with your company as part of your formal stakeholder engagement process.

### External Communication

Even if affected communities *per se* are not identified, you should always establish and maintain a publicly available and easily accessible channel for the members of the public to contact you (e.g., phone number, website, email address, etc.). External stakeholders can provide valuable information such as: suggestions on product improvement; feedback on customers' interaction with your employees; and comments from regulators, NGOs and individuals regarding your company's environmental and social performance.

We present two tools related to this element:

- Checklist for Effective Grievance Mechanism
- Grievances Log



## 7. External Communication and Grievance Mechanism

### Checklist for Effective Grievance Mechanism

#### Instructions

The following checklist will guide you on the key aspects that an effective grievance mechanism should have. We list here some illustrative examples; consider adapting these to your company's size, complexity and local context.

KEY ASPECTS OF EFFECTIVE GRIEVANCE MECHANISMS	COMPANY'S METHOD
<p><b>Provide ease of access to confidentially communicate or file complaints, including anonymous ones</b></p>	<p>Form and instructions on website that people can fill in and submit online.</p> <p>Email address.</p> <p>Telephone hotline.</p> <p>Suggestion boxes located outside the farm gate and in strategic places (e.g., churches, municipality, or civic centers).</p> <p>Weekly visits by a designated community liaison to affected villages or other stakeholders to register complaints.</p>
<p><b>Publicize the system so that stakeholders know it exists and how to access it</b></p>	<p>Distribution of brochures at churches, schools and civic centers, highlighting company profile and operations. This should include instructions for external stakeholders to communicate or file complaints, and explain your procedure to handle complaints.</p> <p>Written procedure is explained by the farm officials/designated community liaison when meeting with community leaders and other stakeholders.</p>
<p><b>Foster sense of legitimacy and trust; encourage dialogue and shared responsibility for outcomes</b></p>	<p>Major cases reviewed by a formal multi-stakeholder oversight body (e.g. company, representatives of affected communities, NGOs, university, municipality).</p> <p>Provision of transparent funding for expert resources, so that any collection of evidence is independent and unbiased.</p> <p>Most serious claims resolved through independent mediation.</p>
<p><b>Be transparent about the process and outcomes</b></p>	<p>All cases are summarized with details about whether the complaint is accepted, and information about the process and timeline for investigation and resolution.</p> <p>Summarized cases are posted on the company website and/or reported back to the complainant through letter/email/community liaison.</p>
<p><b>Implement a predictable and defined process that includes assignment of responsibility, time limits and monitoring of outcomes</b></p>	<p>Company assigns an employee or team to record complaints and then work with relevant staff and external stakeholders to investigate determine actions and report back the outcomes.</p>
<p><b>Make the system a source of continual learning</b></p>	<p>Complaints are systematized and reviewed periodically by the management team to check for effectiveness of the system and promote cumulative learning that can be integrated into the company systems.</p> <p>Company performs perception surveys among affected stakeholders regarding the awareness, accessibility and trustworthiness of the grievance mechanism.</p>



## 7. External Communication and Grievance Mechanism

### Grievances Log

#### Instructions:

Keeping a logbook or database of grievances allows you to monitor their state of resolution. Also, when grievances are systematized, the information can be analyzed and used as a feedback mechanism for improving operations. This tool provides an illustration of useful information to annotate when recording a grievance.

<b>1. GRIEVANCE IDENTIFICATION NUMBER</b>		
<b>2. DETAILS OF COMPLAINT</b>		
2.1 When it occurred		
2.2 Where it occurred		
2.3 How it occurred and who was involved		
2.4 Complainant(s)'s story and expectation		
2.5 Date grievance was recorded		
2.5 Place/method grievance was received		
<b>3. PROFILE OF COMPLAINANT(S)</b>		
3.1 Gender		
3.2 Age		
<b>4. CONTACT INFORMATION OF COMPLAINANT(S)</b>		
4.1 Anonymous (Y/N)		
4.2 Phone		
4.3 Email		
4.4 Address		
<b>5. COMPLAINT ACCEPTED (Y/N)</b>		
<b>5.1 COMPLAINT NOT ACCEPTED</b>		
5.1.1 Action taken	Clearly not related to the operations of the organization – rejected <input type="checkbox"/>	
	Labor-related grievances – transfer to HHRR <input type="checkbox"/>	
	Commercial disputes – transfer to commercial dispute resolution mechanisms or civil court <input type="checkbox"/>	
	Related to governmental policy and institutions – transfer to authorities <input type="checkbox"/>	
	Other <input type="checkbox"/>	
5.1.2 Complainant notified (Y/N)		
5.1.3 Method of notification		
5.1.4 Date of closure		
<b>5.2 COMPLAINT ACCEPTED</b>		
5.2.1 Category of complaint	Particulate emissions to air <input type="checkbox"/>	
	Odor <input type="checkbox"/>	

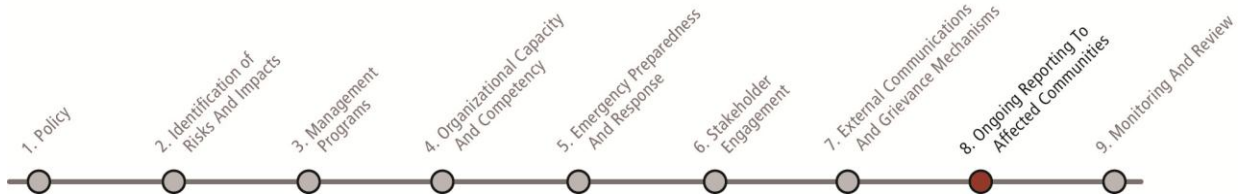


## 7. External Communication and Grievance Mechanism

	Noise <input type="checkbox"/>
	Effluents <input type="checkbox"/>
	Solid waste <input type="checkbox"/>
	Ground water <input type="checkbox"/>
	Company vehicles <input type="checkbox"/>
	Influx of migrant workers <input type="checkbox"/>
	Pest and vectors <input type="checkbox"/>
	Security personnel <input type="checkbox"/>
	Other <input type="checkbox"/>
5.2.2 Photos and documentary evidence of legitimacy	
5.2.3 Resolution instance	First: Internal <input type="checkbox"/> - Responsible people/division:
	Second: Multi-stakeholder oversight body <input type="checkbox"/>
	Third: Independent mediation <input type="checkbox"/>
5.2.4 Resolution/corrective action taken	
5.2.5 Complainant notified (Y/N)	
5.2.6 Method of notification	
5.2.7 Complainant(s) satisfied or appealed	
5.2.8 Photos and documentary evidence of closure	
5.2.9 Resources spent	
5.2.10 Date of closure	
5.2.11 Days from complaint to closure	
<b>6. POST CLOSURE MONITORING REQUIRED (Y/N)</b>	
6.1 Method and frequency of monitoring required	
<b>7. PREVENTIVE MEASURES TO AVOID REOCCURRENCE OF SIMILAR GRIEVANCES</b>	
7.1 Suggested preventive actions	



## 8. Reporting Back to Affected Communities



# Reporting Back to Affected Communities

## Introduction

Affected stakeholders will want to know what actions your company has put in place to resolve the issues identified when communicating with them. Keeping them informed of what you are doing is the final critical piece in building and maintaining a good relationship.

We present one tool related to this element:

- Formats and Venues for Ongoing Reporting



## 8. Reporting Back to Affected Communities

### Format and Venues for Ongoing Reporting

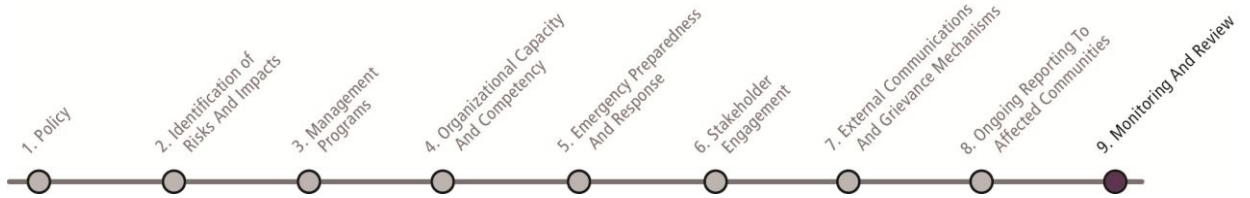
#### Instructions

Look at the list to brainstorm ideas on ways you could communicate back to affected stakeholders on actions taken and monitoring results in their areas of interest.

- Open houses
- Banners outside the farm gate
- Brochures distributed in churches, schools, civic centers
- Website
- Town hall meetings at the local municipality or civic center
- Meetings with representatives of the affected stakeholders
- Letters to representatives of the affected stakeholders and complainants
- Emails
- Phone calls
- Sustainability reporting (e.g., GRI)



## 9. Monitoring and Management Review



# Monitoring and Management Review

## Introduction

Monitoring and review are critical components of the ESMS because they enable you to check and adjust your system. You need to monitor whether your action plans are being implemented and if procedures are followed, as well as whether your ESMS is addressing the relevant risks and ensuring lasting improvements. The goal of the ESMS is to shift from corrective actions to preventive actions. Monitoring and management review provide you with the necessary information to make that shift.

We present two tools for this element:

- Monitoring Plan
- Auditing Guidance



## 9. Monitoring and Management Review

### Monitoring Plan

#### Instructions

Look at your action plans and think about process and performance indicators that will tell you if the actions are being implemented and if they are achieving your targeted objectives. A sample template for developing a monitoring plan is presented below.

See examples of monitoring plans developed for **ABC** and **XYZ** case studies in Section II of this toolkit.

#### Example

**OBJECTIVE:**

**TARGET:**

Actions:

- 1.
- 2.

PERFORMANCE INDICATORS		
Key Performance Indicators	Monitoring records	Monitoring equipment

PROCESS INDICATORS	
Activities/Processes Indicators	Monitoring records





## 9. Monitoring and Management Review

### Auditing Guidance

#### Instructions

Go through all the areas highlighted in the Auditing Guidance – this will help you to get a broad view of all potential risk areas and elements of the ESMS beyond those that you may have targeted in your initial risk assessment.

✓	A. PREPARATION
	Collect audit reports from the animal farm on environmental performance, labor standards performance and community stakeholder engagement for the previous two years.
	Collect corrective action plans generated from previous audits and review the status of each action item that was agreed upon. Are all closed out? Focus review on open items and the underlying reason(s) for incomplete status, and ensure that the audit considers the underlying issues during the upcoming audit. Focus on the underlying limiting factors that prevent completion.
	Ascertain the general level of PPE used in the farm; ensure that auditors wear the same PPE as employees are required to wear: head, hearing, eye, skin protection, protective boots, clothing, etc.; do not allow any auditor to enter work areas without the clothing/gear required for the operations activity and that employees are required to wear.
	Obtain facility layout plans, designating work areas, break areas, activities underway, clean areas, dirty areas, location of fire hydrants/extinguishers, fire exits, emergency lighting and protective covers, restrooms, cleaning and cross-contamination prevention areas (boot, hand wash and disinfection), principal water outlets and drains and any non-potable water outlet (e.g. fire water) clearly marked as non-potable and for emergencies only. Ensure auditing team has a working knowledge of the animal farm/operation to be evaluated.
	<p>Research and refer to current local environmental and labor laws and regulations.</p> <p>Basic labor code issues: (i) regular weekly work hours, (ii) labor contract provisions, (iii) rest periods, lunch, etc., (iv) overtime requirements, limits and exceptions, (v) hour averaging and banking hours, (vi) minimum wage, (vii) social system payment liability, (viii) annual leave, (ix) laws to protect disadvantaged workers, (x) severance pay.</p> <p>Basic environmental code issues: (i) wastewater, (ii) storm water, (iii) spill prevention and response, (iv) construction/demolition/remodeling, (v) hazardous materials, (vi) hazardous waste, (vii) toxic chemical release, (viii) air emissions, (ix) solid waste.</p>
	Review regulatory permit(s) conditions and specific requirements along with most recent review and corrective action reports.
	Review certification(s) audit reports for nonconformance, mandatory remedial actions, recommendations, etc. Summarize status of items (open or closed).
	Review any government inspection reports, third-party audit reports, etc.
	Review the stakeholder engagement plan and records of grievances submitted by external stakeholders. Pay attention to: emergency preparedness and response capability to include the community if necessary; use of manure and drift to communities; accidental releases of hazardous materials, e.g. discharges of wastewater, manure or other wastes from lagoons to areas affecting local communities; exacerbation of flooding; limits of water availability use and physical access; reduction in quality of life due to the operations.
	Pay special attention in observation/document review/interviews to issues identified in previous reports.
	Research and understand the national and local context of labor union rights and activity, local environmental groups and community activist organizations.
	Schedule sufficient time to conduct the scope of the audit. Announce the availability of confidential meeting schedules with employees; schedule, arrange and conduct while protecting employee confidentiality.



## 9. Monitoring and Management Review

✓ B. INTRODUCTORY MEETING WITH MANAGEMENT	
	Meet with the senior management and department managers before conducting audit activities to review ESMS issues and the purpose of the audit.
	Share an agenda for the meeting and itinerary with senior management and department managers.
	With department managers, review the prior audit reports and performance to date in meeting corrective actions.
	Discuss non-retaliation against cooperating workers; inform management that future audits will include reviews of the continued employment of workers interviewed.

✓ C. OPERATIONAL WALK-THROUGH	
	Conduct operational walk-through of the farm. Refer to previous relevant physical walk-through assessments of the facility; determine if all previous nonconformance/action items are closed out; if not, why not?
	Minimize the number of managers that accompany you on the walk-through. One or two escorts based on knowledge/responsibilities are usually sufficient.
	During the walk-through, be aware of your body language and the message this sends to workers; ensure that you are equipped with/wearing the same PPE required of employees.
	<p>Take note of all things observed that require attention:</p> <ol style="list-style-type: none"> <li>1. Conditions of animal building/sheds (cleaning, ventilation, overcrowding, etc.);</li> <li>2. Data on animal diseases and mortality rate;</li> <li>3. Water used indiscriminately for washing/cleaning, water wasting (open taps/water hoses on floor);</li> <li>4. Energy wastage;</li> <li>5. Evidence of spillages;</li> <li>6. Floor status: slippery, wet, etc.;</li> <li>7. Dry cleanup and collection of manure and other solid wastes;</li> <li>8. Harborage or other unorganized storage of materials;</li> <li>9. Wastes and discards;</li> <li>10. Workplace availability of data on hazards/chemicals in use (msds/icsc);</li> <li>11. Movement of materials: hand trucks, forklifts, etc. Are the passageways and transit routes clearly marked; is color-coding used for non-pedestrian movement?;</li> <li>12. Processes related to loading and unloading of animals (status of ramps, trained workers)</li> <li>13. Obvious hazards for heads, hearing, sight, life and limb: Workplace hazards attenuated; employee awareness?;</li> <li>14. Availability/status of man gates in the animal buildings;</li> <li>15. Animal related injuries (crushed/hit by animals, needlestick injuries, etc.)</li> <li>16. PPE used as prescribed, available, replaced at no cost; employee awareness;</li> <li>17. Are employees able to explain jobs and responsibilities?; and</li> <li>18. Evidence of QA team activity.</li> </ol>
	Verify that fire exits exist and open on demand; no means to prevent exit; panic bars in good working order; clear egress once exit opened; emergency exits clearly marked; nearest exits clearly marked; hose cabinets equipped with hoses, nozzles, etc.; prohibited areas clearly marked; electrical cabinets closed and sealed; lockout tag out procedures and tools (tags, locks, warning labels and signs) clearly available near electrical cabinets; first aid cabinets and equipment; emergency lighting; emergency preparedness and evacuation plans in place; employees trained; animal shelters are identified and maintained; employees are trained in animal evacuation; sufficient feed and medical supplies are available for emergency; systems are in place to minimize the possible spread of contagious diseases; manure pits and lagoons are secured to prevent overflow and environment contamination.
	Ambient conditions should be verified for adequacy if there is potential for risks such as air quality, noise, etc. Use measuring devices to determine air quality, noise level, temperature and adequate lighting. This is a good/easy thing to do. For operations or areas with potentially toxic gaseous emissions, there should be LEL (lower explosive limit) meters and alarms installed.



## 9. Monitoring and Management Review

	Verify work permit systems, and lockout/tag out procedures are implemented.
	Following the facility walk-through, conduct a walk-through of the dormitory facilities, canteens, washrooms, change rooms.
	Suggest best practice to supervisors and department managers during the walk-through; ensure that the suggestion is filtered by processes/operations practicalities.
	Give sufficient attention to all ESMS elements during the operation/dormitory walk-through. Knowledge of procedures, training using the procedures, awareness of complaints management and resolution procedure, employment rights, HR policy and provisions, etc.
	Identify all incidences of non-conformance with ESMS issues, both major and minor.
	Pay special attention to areas identified in previous corrective action requests. Focus on open non-conformances from previous audits: why? Elucidate the underlying cause and make an effort to diagnose and prescribe preventive, ameliorative measures. . The individual who is responsible for the issue is not as important as why it occurred and how the company can prevent non-conformances and unplanned events in the future.

✓	D. INTERVIEWING WORKERS
	Select at least 5 percent of workers. Cap at 100 workers. Conduct individual and group interviews for balanced response.
	Select workers who are representative of the workforce population (gender, race, age, religion, functional departments, etc.).
	If the farm has contracted or migrant workers, make sure to select from all groups.
	Do not allow supervisors or managers to influence selection of workers for interviews or the interviews.
	Conduct on-site interviews in areas that protect worker confidentiality and where the worker would feel comfortable. Make sure supervisors or managers are not in or near the space where the interviews are conducted. Keep them away from the selection and interview process.
	Conduct interviews early in the audit to allow for follow-up.
	Make sure to tell the workers that everything they say is confidential and that management has been warned against retaliation.
	Be sensitive to cultural and gender issues.
	Plan for an average of fifteen minutes per interview; however, use common sense in terminating interviews that are becoming nonproductive and extending interviews with people who are candid or openly addressing critical issues.
	Formulate questions prior to the interviews to make sure you cover all specific areas of the ESMS review through the aggregated interviews. Always ask employees how processes may be improved, water use reduced, energy saved, waste reduced, etc.
	If you plan to take notes, ask the workers if it is OK and clearly explain reason for taking notes. Try to minimize note taking as much as possible during the interview. Finish writing your notes immediately after the interview, so you have accurate documentation.
	Have your worker representatives recommend a preferred approach to building rapport with workers.
	Ask workers specifically about follow up on previous corrective action plans. What non-conformances remain open; what issues presented through the complaints management and resolution mechanism remain open?



## 9. Monitoring and Management Review

Make sure your questions address the following:

### LABOR ISSUES

- Do workers know about and understand your policies related to labor and working conditions?
- Do workers understand their rights under the law related to freedom of association and collective bargaining?
- Do workers understand how their wages are calculated, for base time, performance and overtime?
- Are workers aware of any dismissal, transfer, demotion or other punitive action against workers due to their exercising their rights under either their contracts or local or national law?
- Ask workers about the status of trade unions, worker committees or other worker groups in the farm and whether there is management interference.
- Ask questions to determine conformance to discrimination and sexual harassment policies.
- Do workers understand the company's grievance mechanism, and do they feel it is operational and free from retaliation?

### OCCUPATIONAL HEALTH AND SAFETY ISSUES

- Do workers feel safe and protected in their jobs? For example, are they provided with PPE that is appropriate and works? Is their physical environment free of hazards and obstructions? Are they expected to reduce physical hazards or are engineering controls in place? Are job hazards assessments conducted routinely and when the processes or materials change? Have issues submitted through the complaints management and resolution mechanism been addressed?
- Do they feel there is adequate safety equipment, such as extinguishers/hydrants and first aid kits? Are there sufficient safety drills if an emergency, such as a typhoon, flood or wind storm, were to occur and necessitate an evacuation from buildings? Witness the emergency mock drills and make note of shortcomings; ask an employee to pretend he/she has just been injured and explain what to do next.
- Are they instructed and trained on these risks at regular intervals?
- Have any workers been involved in accidents at the facility and, if so, what happened afterwards?
- Is the environment comfortable to work in, in terms of air quality (no coughing), ventilation, adequate illumination for the task at hand, natural light wherever and whenever possible, light, oppressive humidity or heat?
- Do they feel that chemicals, waste and other substances are stored or disposed of safely and appropriately at the facility? Access to and training using Material Safety Data Sheets (MSDSs) and/or International Chemical Safety Cards (ICSCs)? Response to any expressed issues through the complaint management and resolution mechanism?

If the organization employs contract workers, make sure to ask questions that address possible violations and areas of abuse. Do you feel different from a permanent employee? Why?

Conduct some worker interviews off-site if possible.



## 9. Monitoring and Management Review

✓ E. INTERVIEWING AFFECTED COMMUNITIES AND OTHER STAKEHOLDERS	
	The stakeholder mapping exercises and stakeholder consultation meetings should help identify the relevant population that is affected by the facility and its activities.
	Select a sample of individuals that represents the views of this affected community such as local villagers and small landowners. This group may include members of the public as well as NGOs, campaign groups, trade unions, local businesses and government authorities. If possible, target NGOs that are industry-specific. Seek out former employees if possible, but filter out disgruntled former employees or those with a personal agenda against the company.
	Gauge awareness of the grievance mechanism. Has it been tested? Does it work? Does the company utilize it in practice or is it ignored? Is it taken seriously?
	Be sure to include representatives from indigenous or marginalized groups in these interviews.
	<p>Make sure your questions address the following:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> How have the farm's operations affected the physical environment (air, water, land) near them?</li> <li><input type="checkbox"/> Has this resulted in either air, land or water contamination?</li> <li><input type="checkbox"/> Has wildlife been affected by the farm's activities?</li> <li><input type="checkbox"/> Has the farm's business impacted local livelihoods, access, traditional hunting/fishing/breeding/religious/other grounds due to natural habitat conversion?</li> <li><input type="checkbox"/> Have any health risks or deterioration to well-being been associated with the farm/plantation from exposure to pesticides, air emissions or noise pollution? Note any neighbors or employees with sick kids or significant abortion rates.</li> <li><input type="checkbox"/> Have any contagious illnesses been on the rise due to an influx of workers to the farm/plantation such as malaria or other local vector-borne diseases? Is the community aware of an increase in the rat/mouse or other vermin population?</li> <li><input type="checkbox"/> Have these affected groups had any clashes with security hired at the farm?</li> <li><input type="checkbox"/> Have any of these groups consumed goods or products from the farm that have had a deleterious effect on their health? Any level of awareness of company's refusal to replace questionable goods?</li> <li><input type="checkbox"/> Have any of these groups been approached or invited by the company running the farm/plantation to discuss their concerns at meetings? Have any of their grievances been addressed or investigated? Has the company followed up on questions?</li> </ul>

✓ F. ON-SITE DOCUMENT REVIEW	
	<b>LABOR ISSUES:</b>
	<p>Make sure you review the relevant documents for the following areas:</p> <ol style="list-style-type: none"> <li>1. Human resources: Management-worker committee meeting minutes, memos and letters, budgets related to implementing labor policy, training material, logs and curricula or written communications to workers that address all issues, training records and instructor qualifications.</li> <li>2. Working conditions: Contracts for all workers; policies and procedures related to wages, benefits, hours and leave; evidence of communication and training on wage calculation; personnel files; time cards; payroll records and pay stubs (selected without management interference); criteria used to set performance pay bonuses; and employment and termination records.</li> <li>3. Are employee payment methods secure? Are employees able to have payments deposited into an account? Are they paid in cash at the facility (which can lead to significant risks during the trip home)?</li> <li>4. Collective bargaining: Collective bargaining policy, agreement and documentation (such as minutes and records of collective bargaining sessions).</li> <li>5. Discrimination: Discrimination policy; related procedures; documentation handling discrimination issues; diversity training and attendance log; hiring, promotion and termination records; gender demographics in facility at worker and manager levels.</li> <li>6. Retrenchment: Policies and procedures for workforce reduction, severance and transition; documentation of prior workforce reductions; minutes of management meetings and communications to workers on this issue.</li> <li>7. Complaint management and resolution mechanism: Documented procedure, communications, records and logs of grievance handling.</li> </ol>



## 9. Monitoring and Management Review

	<p>8. Child labor: Procedure for age verification, documentation of apprentice program, birth and medical records and school records of workers.</p> <p>9. Forced labor: Employment contracts (as well as for those workers hired through recruitment agencies), payroll records, timesheets and wage deduction, worker passports and IDs.</p> <p>10. Health and safety: Accident and medical treatment logs, equipment safety logs, logs of fire and safety drills, health and safety risk analyses, government health inspection reports, safety certificates and training curriculum and logs, and evidence of changes to all of this when company processes, methods, chemicals, materials, etc. are changed, reordered, etc.</p>
	<p>Select files and/or records at random to generate a representative sample of the workforce population and functional distribution in the factory. Seek some files to corroborate interviews conducted earlier.</p>
	<p>If the farm employs contract workers, address potential areas of abuse in the document review. Specifically review the contract with the workers.</p>
	<p>Identify all significant incidences of non-conformance in preparation for your management meeting.</p>
<b>ENVIRONMENTAL AND OSH ISSUES:</b>	
	<p>Make sure you review the relevant documents for the following areas:</p> <ol style="list-style-type: none"> <li>1. Emergency response and preparedness: Examine the facility's emergency response procedures and accident reports, as well as documents indicating that workers have been trained on these issues. Ask the employee to show you how to get out, assuming that there is now a fire; follow the employee; ask another to tell/show you what happens if he/she was just injured.</li> <li>2. Environmental management: Examine any company environmental policies and environmental management system policies and reports, including sustainability reports, energy consumption records, guidelines and monitoring, resource use and waste generation. Status of previously noted non-conformances.</li> <li>3. Insurance: Identify documents that indicate legal permits have been obtained, insurance policies are in place and the relevant legal authorities notified of the facility's activities.</li> <li>4. Technical: Documents on production processes, and storage, purchase and maintenance of facility equipment. Availability of MSDS/ICSCs and employee training and orientation to the specific risk posed by materials in use; response to submissions through the complaint management and resolution mechanism.</li> <li>5. Waste disposal: Policies, procedures, guidelines on elimination and recycling of waste emissions and effluents to air, water and land, including monitoring of the quantity and quality, treatment and disposal of all waste, including wastewater and solid waste; are employees/area supervisors queried for opinions on improvements?</li> <li>6. Hazardous material: The storage of chemicals and toxicology sheets (MSDS/ICSCs from ILO/WHO/EU/UNEP, etc. Avoid total reliance upon manufacturer's statements). Does procurement mandate furnishing such materials?</li> <li>7. Health and safety: Check for the existence of logs of accident and fatality rates, health and safety guidelines or handbooks for workers and monitoring of these statistics, including the job hazard analyses and engineering corrections to eliminate hazards at the source, as opposed to requiring employees to mitigate environmental hazards; provision of appropriate PPE that cover actual, defined technical, physical, biological and chemical hazards in the workplace; Tool Box safety meetings records.</li> <li>8. Work environment: Look for guidelines, reports, logs and "ecomaps" of the facility work environment that monitor emissions of dust, odors, sources of noise and vibrations and worker exposure to heat and cold. LEL meters and audible and visual alarms are mandatory wherever there may be accumulations of dust or ambient dust.</li> <li>9. Sanitary: Review policies, procedures, guidelines and reports (including from relevant government departments), as well as training manuals and logs on staff hygiene and food safety management. Ask to use the toilet; be shown where and how to access for both men/women; asses the reentry procedures.</li> </ol>



## 9. Monitoring and Management Review

✓ G. CLOSING MEETING WITH MANAGEMENT	
	Conduct a closing meeting with senior management and department managers.
	Present your preliminary findings with particular emphasis on the positives as well as areas for improvement. All new and previously existing non-conformances must be addressed. Seek clarification on any findings or issues raised during the audit.
	Work with the department managers and supervisors on a corrective action plan that details specific actions to be taken and timelines for their completion.
	Go over any outstanding corrective action requests from previous audit reports.
	Make sure senior management signs off on the corrective action plan.



# ESMS Case Studies

## ANIMAL PRODUCTION



## ABC Chicken Company, Brazil

ABC Chicken Company (ABC) is a medium-sized poultry production farm in southeast Brazil. The company is family-owned; in addition to family members, it employs 30-40 workers depending upon the season and output. The current production rate at ABC is over 600,000 chickens per year. Currently, the company is selling nationally, supplying retail and restaurants, but is aiming to increase its production by 20% by the end of next year.

There have been instances when **large numbers of birds died due to heat, suffocation, and over-crowding**. The birds are packed into the chicken houses so that they barely have space to stand normally, turn around or stretch their wings. ABC has no recording system that demonstrates compliance with industry regulatory maximums regarding stocking density. Ventilation is also an issue since extra bird volume can increase the chicken shed temperature by more than 3% above outside temperatures, especially in the summer. ABC has been advised in the past to either lower its stocking density or increase ventilation and humidity as needed to comply with national norms. It has not yet implemented these measures.

The Brazilian Institute of Environment and Renewable Natural Resources recently sent a legal notice to the company in connection with **contamination of a nearby major river**. The company's operators are accused of generating liquid discharges from various sources including poultry housing and waste storage areas. Also, various environmental NGOs allege that **arsenic contamination in the local water supply** is caused by pollution from the company's indiscriminate use of Roxarsone® in animal feed. Although this compound is no longer used in Western countries, it appears that this company is using up existing stocks.

ABC's management of animal waste from its poultry production operations has developed into a significant problem since the company has tried to increase its production levels. Poultry litter consists of a mixture of fecal droppings, antibiotic residues, heavy metals, cysts, larvae, decaying carcasses, and sawdust/rice hulls. Chicken manure contains 4 times the amount of nitrogen and 24 times the amount of phosphorous typically encountered in wastes from hog or dairy operations. ABC routinely sells untreated chicken manure and bedding waste to local farmers who spread it on their land. ABC's manure and bedding waste is stored in outside areas such as piles or walled silos without roofs until it is ready for transport to a disposal site or land application for agricultural use. Leachate from stored chicken house bedding waste and runoff from agricultural fields where these solid wastes are applied have been flagged as having the potential to contaminate surface and groundwater with nutrients, ammonia, sediment, pesticides, and pathogens.

To date, ABC has carried out no environmental assessment of the impact of its waste management program. The company maintains its adherence to substandard practices despite the availability of best practices information from industry associations and agricultural extension agents. Best practices include improved manure storage facilities with concrete floors, roof gutters on buildings to collect and divert clean storm water, covering manure storage areas with an impermeable material such as plastic sheeting, weighting the covers to prevent wind transport, and locating manure piles away from water bodies, floodplains, wellheads or sensitive habitats.

Workers have raised concerns about the **respiratory hazards posed by working at the farms**. Several external workers that undertake a variety of tasks, such as the placement of litter, populating poultry houses, handling, inspecting and vaccinating birds, cleaning houses after the growing period, catching and culling birds, and removing litter and/or manure, have fallen sick. There are complaints of headaches, nausea, nasal irritation and chest tightness due to the high concentrations of respiratory toxicants in the sheds. Airborne contaminants from the farm include a mixture of organic and inorganic materials from bedding material, mites, skin debris, broken feather barbules, insect parts, aerosolized feed, and poultry excreta, as well as a number of recognized *asthmagens* such as softwood and grain dust. In some European countries and in North America, there is strong evidence for treating so called *poultry dust* as a substance

hazardous to health. Currently, ABC does not undertake any health surveillance to investigate early symptoms of ill health. The workers' union is demanding health protection programs and improved working conditions, including maintaining proper temperature, relative humidity and ventilation in the sheds through air extraction devices for sheds and at dust generating equipment; and adequate respiratory protection such as half-face masks equipped with filters designed to capture dust and micro-organisms. A few years ago, the company experienced an outbreak of highly pathogenic avian influenza affecting its production. Management is concerned that unresolved **biosecurity** issues and poor environmental conditions at its farms pose an immediate risk and the potential for a new outbreak. The company plans to enhance biosecurity measures to minimize the risk at its farms.

Finally, senior management has called for an urgent meeting after highly critical articles in several newspapers appeared last week and revealed that one of their customers is recalling ABC's meat products due to various **food safety complaints** including detection of trace amounts of arsenic.

To address these environmental and social issues, as well as the growing concerns and expectations of the local communities, regulators and consumers, ABC aims to establish a fully functional environmental and social management system (ESMS) based on international standards by the end of current fiscal year..

## **ABC CHICKEN COMPANY Policy Statement**

Under pressure from its clients, personnel and community, ABC has decided to adopt policies for the environment, labor and working conditions using guidance given in the suggested Policy Statement in Section I of the Toolkit.

### **Environment**

- Our company will comply with applicable environmental laws and regulations.
- We will monitor our generation of solid waste and liquid discharges.

### **Resource Efficiency**

- We will take feasible and cost-effective measures to improve efficiency in our consumption of energy, water and our most important input materials.

### **Pollution Prevention**

- We will avoid or minimize the release of emissions and pollutants to air, water and land from routine, non-routine and accidental circumstances.

## **Labor and Working Conditions**

### **Human Resources Policies and Procedures**

- Our company will have documented policies and procedures related to our labor standards code, in keeping with international standards and national labor law.
- We will inform workers of their rights regarding work hours, wages, overtime, compensation, leave and benefits under our code as well as national labor and employment law.

### **Working Conditions and Terms of Employment**

- We will provide reasonable working conditions and terms of employment, at a minimum complying with national labor law.

### **Workers' Organizations**

- Our company will comply with national laws that recognize workers' rights to form and to join workers' organizations.
- We will not interfere with or discriminate against workers who choose to organize.
- We will negotiate in good faith and respect any collective bargaining agreements that we sign.

### **Non-Discrimination and Equal Opportunity**

- Our company will hire, promote and compensate workers solely based on ability to do the job.
- All workers will be given equal access to training, tools and opportunities for advancement.
- We will ensure that all workers are free from harassment by management or other workers

### **Retrenchment**

- If we have a large number of layoffs, workers will receive notice and all due back pay, severance and benefits as required by law.

### **Grievance Mechanism**

- Our company will establish a transparent process for workers to express concerns and file grievances, including anonymous complaints.
- Management will treat the grievances seriously, take prompt, appropriate action and ensure there is no retaliation.

**Child Labor**

- Our company will not employ workers under the minimum age for employment as defined by national law.
- Workers between the minimum age and 18 will not be employed in dangerous work or work that interferes with their education or development.

**Forced Labor**

- Our company will not employ forced labor.
- We will respect workers' rights to retain their personal documents and money.
- We will respect workers' rights to leave the workplace after work.

**Occupational Health and Safety**

- We will take all necessary precautions to prevent and mitigate work-related risks and develop an emergency prevention and response system.
- Workers will be provided personal protective equipment and appropriate training at our company's expense.
- We will document and report accidents, diseases and incidents.

**Workers Engaged by Third Parties**

- Our company will extend our labor standards performance policies and procedures to our contractors hired directly or through employment agencies.

**Supply Chain**

- Our company will extend our principles concerning child labor, forced labor and worker safety to our suppliers.

**Community Health, Safety and Security**

- Our company will avoid or minimize any potential community exposure to health and safety risks from our operations.

**Biosecurity**

- We will implement biosecurity management programs to ensure protection against epizootics and zoonotic diseases.

**Food Safety**

- We will formulate chicken feed in compliance with good international industry practices.
- We will not allow unauthorized and untrained people to be in charge of feed mixing or addition of veterinary drugs and other feed additives.

## ABC 2. Identification of Risks and Impacts

### ABC FOOD COMPANY Risk Identification Worksheet

ABC's ESMS team used the Risk Identification Worksheet below to identify those areas where problems are more likely to happen.

LABOR AND WORKING CONDITIONS RISKS		
RISK FACTORS	My company has the following conditions (circle the appropriate answer)	Potential negative impact (A "yes" response means that there is a potential negative impact)
There is a difference in nationality, race or religion between workers and managers.	Yes/No <input checked="" type="radio"/>	Discrimination. Disciplinary abuse and harassment.
We have an apprentice program that provides young workers with training and work experience.	Yes/No <input checked="" type="radio"/>	Forced labor. Child labor.
We use recruiting agencies and contract workers.	Yes/No <input checked="" type="radio"/>	Inadequate wages, benefits and contracts. Forced labor.
We use homeworkers or contractors that use homeworkers.	Yes/No <input checked="" type="radio"/>	Inadequate wages, benefits and contracts. Forced labor. Child labor.
We use seasonal or temporary workers.	Yes/No <input checked="" type="radio"/>	Inadequate wages, benefits and contracts. Excessive overtime.
Some of the workers in my company are migrants from another area.	Yes/No <input checked="" type="radio"/>	Forced labor. Discrimination.
We provide a dormitory for some or all of our workers.	Yes/No <input checked="" type="radio"/>	Lack of freedom of movement. Lack of clean adequate space. Excessive charges for the use of the dormitory.
There are security guards at our company.	Yes/No <input checked="" type="radio"/>	Lack of freedom of movement. Harassment.
We are located in a free-trade zone.	Yes/No <input checked="" type="radio"/>	Inadequate wages, benefits and contracts.
There is a large fluctuation in orders and/or seasonality of production.	Yes/No <input checked="" type="radio"/>	Excessive overtime. No payment of overtime due to hour-averaging. Layoffs.
There is a labor shortage in my area.	Yes/No <input checked="" type="radio"/>	Child labor.
There is no history of collective bargaining, unions or other forms of worker representation at our company.	Yes/No <input checked="" type="radio"/>	Discrimination. Restriction on freedom of association and collective bargaining.
There is no procedure for workers to express their complaints (grievance mechanism).	Yes/No <input checked="" type="radio"/>	Discrimination. Disciplinary abuse and harassment. Worker injuries and chronic conditions.
The organization has a history of collective dismissal(s) in the past or may be vulnerable to collective dismissal due to poor financial conditions or technical reasons.	Yes/No <input checked="" type="radio"/>	Discrimination. Inadequate retrenchment procedures leading to termination payments and benefits that do not comply with national law.
Large equipment, such as tractors or front-end loaders are used in our operations.	Yes/No <input checked="" type="radio"/>	Worker injuries and chronic conditions.
We have significant amounts of dust in the work zone (dust in an animal rearing facility may contain feed particles, animal or rodent fecal dust, pollen, bacteria, shed skin cells, mould, insect parts, etc.)	Yes/No <input checked="" type="radio"/>	Exposure to pathogens resulting in chronic conditions.
Our activities involve workers routinely	Yes/No <input checked="" type="radio"/>	Worker injuries and chronic conditions.

## ABC 2. Identification of Risks and Impacts

interacting with machinery, equipment with sharp edges and/or slippery work surfaces.		
We have not identified all operations that require personal protective equipment (PPE). Not all workers are aware of the workplace hazards and how to use the appropriate PPE.	Yes/No	Worker injuries. Exposure to hazardous material and chronic conditions.
Our production activities involve hazardous materials or processes that could cause fires or explosions.	Yes/No	Worker injuries or casualties.
Our production area includes enclosures with large animals.	Yes/No	Worker injuries or casualties.
Our production area includes confined spaces.	Yes/No	Worker injuries or casualties.
Our operations include significant handling of animals by our workforce.	Yes/No	Worker injuries or casualties.
Electric powered pressure washers are used in our operations.	Yes/No	Worker injuries or casualties due to electrocution.
Our activities include significant lifting, carrying or repetitive motions.	Yes/No	Worker injuries and chronic conditions.
There are processes that involve lifting of heavy loads (e.g. lifting of animal feed, lifting during weaning, etc.)	Yes/No	Worker injuries and chronic conditions.
We have operations/areas with high noise levels (e.g. swine in confinement at feeding may have a noise level of 121 dB to 133 dB)	Yes/No	Hearing impairment.
Our production activities involve the handling of living and dead animals that can transmit diseases to humans.	Yes/No	Zoonotic diseases.
Our production activities involve the handling of animal blood, urine or feces without proper personal protection.	Yes/No	Zoonotic diseases.
Our workers don't have access to separate and clean areas for eating and changing clothes.	Yes/No	Worker illnesses.
Bathrooms are not properly cleaned and often lack running water, soap and toilet paper.	Yes/No	Worker illnesses.
Our primary suppliers would probably answer "Yes" to most of the questions above.	Yes/No	All of the above.

## ABC 2. Identification of Risks and Impacts

ENVIRONMENTAL RISKS		
RISK FACTORS	My company has the following conditions (circle the appropriate answer)	Potential negative impact (A “yes” response means that there is a potential negative impact)
Our operations require large quantities of fresh water.	Yes/No	Groundwater depletion in the region. Contamination of ground or surface water sources in the region due to discharge of effluent. High energy consumption for treatment of raw or processed water.
We don't have sufficient fresh water supplies to meet our requirements.	Yes/No	Local and regional groundwater depletion.
Our operations have high requirements for power supply.	Yes/No	High energy consumption.
We require large quantities of fuel (gas/diesel/coal/etc.) for our operations (e.g. hot water, heating, etc.).	Yes/No	Air emissions. Solid waste (fly and bottom ash if coal is used).
We have various process and utility equipment which may generate air emissions (e.g. boiler, diesel generator set, incinerator, grinder, etc.).	Yes/No	Air emissions. Solid waste (e.g. waste from equipment maintenance, fly and bottom ash from coal-based boilers). Hazardous waste (e.g., waste oil, oil-soaked filters and rags). Liquid waste (e.g. boiler blow-down, waste oil). Noise generation.
We need to store large quantities of fodder and animal feed materials at site.	Yes/No	Solid waste due to possible contamination or deterioration of animal feed. Gaseous or liquid emissions leading to water contamination due to fodder/animal feed degradation.
We have feed grinding operations at site.	Yes/No	Dust generation. High noise levels at work zone.
We generate large (or significant) quantities of solid or liquid waste due to cleaning operations (e.g. manure).	Yes/No	Solid waste. Liquid waste. Contamination of land, groundwater and/or surface water due to improper disposal of solid and liquid waste. Wastewater from cleaning. Energy and water consumption due to pressure washing.
We generate large (or significant) quantities of solid or liquid waste from packaging material, waste feed, pesticides, ventilation filters, used/spoilt medications.	Yes/No	Solid waste. Liquid waste. Contamination of land, groundwater and/or surface water due to improper disposal of solid and liquid waste.
We have large manure collection and storage systems (e.g. belowground tanks, above-ground tanks, earth-banked lagoons, weeping wall stores, etc.).	Yes/No	Solid waste. Liquid waste. Contamination of land, groundwater and/or surface water due to improper storage or leakage of solid and liquid waste. Emission of toxic gases and odor (e.g. ammonia, H <sub>2</sub> S, etc.). Exposure to wildlife and local communities.
We use the manure as fertilizers or provide it to the local communities who can use it as fertilizers.	Yes/No	Land contamination. Ground or surface water contamination.
Animal mortality is high and animal carcasses are generated that need to be disposed.	Yes/No	Solid waste. Contamination of land, groundwater and/or surface water due to improper disposal of animal carcasses.
We dispose of our solid waste in our landfill or city's landfill facility.	Yes/No	Contamination of land, groundwater (due to leachate) and/or surface water (due to runoff). Impact on wildlife or fisheries. Diseases



## ABC 2. Identification of Risks and Impacts

		through vectors. GHGs generation (e.g. methane).
Our personnel, vehicles or farm animals move from one farm to another.	Yes/No	Contamination or spread of animal diseases (epizootics and zoonotic diseases).
We generate large (or significant) quantities of wastewater (e.g. runoff from feed including silage, livestock housing, feeding and watering, floor cleaning, etc.).	Yes/No	Contamination of ground and/or surface water due to improper disposal of wastewater.
We discharge our wastewater (process effluent) in a nearby river/lake/or any other water body.	Yes/No	Contamination of receiving water body and aquatic life (high BOD5, COD, TSS). Eutrophication.
We treat our wastewater (process effluent) before discharge.	Yes/No	Energy consumption. Solid waste generation (e.g. sludge from treatment process). Land and/or water contamination due to improper disposal of waste.
We treat our sewage (from toilets, washrooms, etc.) before discharging it in the city's sewer line.	Yes/No	Energy consumption. Solid waste generation (e.g. sludge from treatment process). Land and/or water contamination due to improper disposal of solid waste.
We utilize our treated wastewater (process effluent) for irrigation (either by ourselves or provide it to community).	Yes/No	Contamination of land, groundwater (due to leachate), surface water (due to run-off) and/or crops if toxic chemicals are present in the treated wastewater.
We generate some hazardous or toxic waste (e.g. expired veterinary drugs, waste chemicals, used/waste oil/sludge from wastewater treatment plants based on chemical treatment, etc.).	Yes/No	Contamination of land, groundwater (due to leachate) and/or surface water (due to run-off) if disposed improperly.
We require a large land area for our industrial operations.	Yes/No	Loss of natural habitats or agricultural land. Air, water and/or land pollution based on expansion requirements and infrastructure development.
Our operations may have an impact on the surrounding forest or wildlife (e.g. overgrazing, land degradation, etc.).	Yes/No	Loss of native species. Impact on biodiversity.
We use some banned/controlled chemicals/materials in our processes.	Yes/No	Non-fulfillment of regulatory requirements. Air, land or water pollution depending on current usage. Exposure of workers or consumers to banned chemicals. Food safety.
We face problems related to pests/vectors.	Yes/No	Use of chemicals. Chemical exposure to workers. Land or water contamination due to improper disposal of pesticides containers.

### COMMUNITY HEALTH, SAFETY AND SECURITY RISKS

RISK FACTORS	My company has the following conditions (circle the appropriate answer)	Potential negative impact (A "yes" response means that there is a potential negative impact)
Our production activities involve treatment of animals with antibiotics or other growth promotants that may result in contamination of meat, water or crops (from manure usage as fertilizer).	Yes/No	Food contamination/food safety issues.



## ABC 2. Identification of Risks and Impacts

Our production activities and treatments involve generation of solid and liquid wastes (e.g. manure, urine, etc.) that may lead to odors.	<input checked="" type="radio"/> Yes/ <input type="radio"/> No	Exposure of community to odors, pathogens and toxic emissions (e.g. ammonia, H <sub>2</sub> S, etc.).
We use certain banned chemicals, pesticides and other hazardous substances in our operations.	<input checked="" type="radio"/> Yes/ <input type="radio"/> No	Exposure of community to banned chemicals/hazardous substances. Water and land contamination. Impact on wildlife.
Our operations involve air emissions, water discharge, solid waste disposal, leakage of chemicals or gases, etc. (e.g. lagoons, manure collection and storage systems), that may affect the surrounding community.	<input checked="" type="radio"/> Yes/ <input type="radio"/> No	Air, water or land contamination, which can affect the health and livelihood of local communities.
We plan to develop new infrastructure, buildings, equipment and other facilities.	<input checked="" type="radio"/> Yes/ <input type="radio"/> No	Exposure of communities to air emissions, noise and accidents due to equipment and vehicular movement. Impact on wildlife, biodiversity and local livelihoods due to natural habitat conversion.
We plan to decommission and dispose of old infrastructure, buildings, equipment and other facilities.	Yes <input checked="" type="radio"/> No	Health risks to communities due to exposure to toxic substances (e.g. from chemicals, heavy metals, asbestos, etc.), and air emissions and noise due to equipment and vehicular movement. Impact on wildlife and biodiversity.
There is significant movement of vehicles in and around our facility due to our operations (e.g. vehicles transporting livestock, feed manufacturing and supply to farms, movement of water tankers, etc.).	<input checked="" type="radio"/> Yes/ <input type="radio"/> No	Exposure of communities to air emissions, noise and accidents due to vehicular movement.
We store hazardous material or hazardous waste in our facility.	<input checked="" type="radio"/> Yes/ <input type="radio"/> No	Health risks to communities and negative impacts on wildlife and biodiversity due to unintentional (spills) release of hazardous or toxic substances contaminating air, land and/or water.
We discharge water from our operations, which may have an impact on surrounding water bodies (e.g. treated wastewater, accidental discharge from lagoons, overflow from lagoons during rainy season, etc.).	Yes <input checked="" type="radio"/> No	Negative impacts on local food security and income generation due to contamination of aquatic life. Illness among local communities due to the use of contaminated water.
We hire temporary and migrant workers.	<input checked="" type="radio"/> Yes/ <input type="radio"/> No	Communicable diseases brought or spread by the influx of workers.
We hire private security personnel	<input checked="" type="radio"/> Yes/ <input type="radio"/> No	Conflicts with communities and indigenous people.
Our operations have close proximity with the local community.	<input checked="" type="radio"/> Yes/ <input type="radio"/> No	Conflicts with communities and indigenous people (e.g. due to emissions and odor from our operations, sharing of local resources, etc.).

## ABC | 2. Identification of Risks and Impacts

### ABC CHICKEN COMPANY Process Map

The Process Map presented below covers of the activities and operations carried out at ABC Chicken Company. However, these processes and operations would be similar to the most of the processes and activities in other animal rearing industries as well.

Inputs	Process	Outputs	Potential Negative Impacts - OHS	Potential Negative Impacts - Environment And Community	Opportunity For Waste Reduction/ Energy & Water Savings
Materials, labor, resources	Operational activity	Product, waste, by-product	Injuries, long-term illness	Discharge, contamination, pollution, Shortage	Improved process, re-purposing and recycling by-products
Fuel, manual labor	Transportation / movement of feed material		Worker injuries from repetitive motion	-Exposure of communities to air emissions, noise and accidents due to vehicular movement	
	▼				
	Feed storage	Waste feed		- Spoilage leading to waste of resources	Compost
	▼				
Manual labor	Feed mixing	Waste feed	Worker injuries from cuts, abrasions; falls on slippery floors	-Spills leading to waste of resources -Potential contamination of ground and surface waters	Compost
	▼				
Manual labor	Unloading and loading of animals and animal shed bedding		Worker injuries from cuts, abrasions; falls on slippery floors. Exposure to dust containing particles of ammonia, feed particles, animal or rodent fecal dust, pollen, bacteria, shed skin cells, mould, insect parts, etc. (poultry dust)		
	▼				
Manual labor	Animal production including breeding, gestation, farrowing weaning, etc.		Worker injuries from repetitive motion; exposure to poultry dust.	Odor and air emissions from mortality disposal	
	▼				

## ABC 2. Identification of Risks and Impacts

Manual labor	Handling and disposal of carcasses	Carcasses, animal tissues	Worker injuries from repetitive motion; exposure to pathogens	- Potential contamination of land, ground and surface waters due to unsafe disposal	Compost; rendering
	▼				
Manual labor	Collection and storage of waste and manure	Liquid and solid waste	Worker injuries from slips, trips and fall; exposure to pathogens	Organic waste, leading to: - potential contamination of ground and surface waters	Compost; biogas; by-products
	▼				
Manual labor, equipment and power	On-farm manure treatment	Manure	Worker exposure to pathogens/ harmful gases	Organic waste, leading to: - potential contamination of ground and surface waters	Compost
	▼				
Manual labor	Storage and disposal of residual product	Liquid and solid waste	Worker injuries from slips, trips and fall; exposure to pathogens	Organic waste, leading to: - potential contamination of ground and surface waters	Compost; biogas; by-products
	▼				
Manual labor	Application of treated manure and wastewater on own or community land		Worker exposure to pathogens/chemicals	Potential contamination of land; and ground and surface waters	Compost

## ABC 2. Identification of Risks and Impacts

### ABC CHICKEN COMPANY Risk Assessment Prioritization Form

Based on the Risk Identification Form, ABC used the Risk Assessment Prioritization Form below to address the highest priority risks for their Action Plans.

COMPANY AREA OR DEPARTMENT	RISK	PROBABILITY OF OCCURRING (low, medium, high, extreme)	SEVERITY IF OCCURRED (low, medium, high, extreme)	NOTES
<b>Production Department (poultry housing and waste handling)</b>	Contamination of nearby rivers due to inappropriate management of poultry waste.	Extreme	Extreme	<ul style="list-style-type: none"> <li>Ongoing issue since the company has been served a legal notice by the Brazilian Institute of Environment and Renewable Natural Resources.</li> <li>Contaminated storm water and leachate from waste storage areas (poultry litter) and runoff from agricultural fields where this untreated solid waste is applied may have high levels of BOD<sub>5</sub> and COD, nitrogen, phosphorus, chemical residues and pathogens.</li> </ul>
<b>Production Department (poultry feeding and waste handling)</b>	Arsenic contamination in the local water supply.	Extreme	Extreme	<ul style="list-style-type: none"> <li>Ongoing concern raised by local environmental NGOs.</li> <li>The company uses Roxarsone<sup>®</sup> in its chicken feed which is an arsenic-containing drug that promotes weight gain and improved feed efficiency.</li> <li>Use of Roxarsone<sup>®</sup> has been banned in most Western countries.</li> <li>Waste from chickens treated with Roxarsone<sup>®</sup>, when used as fertilizer on crops, causes arsenic to leach into water supplies and estuaries.</li> </ul>
<b>Production Department (poultry housing)</b>	Animal mortality due to overcrowding.	Extreme	High	<ul style="list-style-type: none"> <li>No compliance with industry maximums regarding stocking density.</li> </ul>
<b>Production Department (poultry housing, feeding and waste handling)</b>	Exposure to hazardous/toxic air borne contaminants including asthamagens (poultry dust) resulting in respiratory diseases.	Extreme	High	<ul style="list-style-type: none"> <li>Poultry dust may vary in composition from pure wood dust to a complex mixture of organic and inorganic particles, faecal material, feathers, dander (skin material), mites, bacteria, fungi and fungal spores and endotoxins.</li> <li>Some of the individual components, e.g. storage mites and softwood dust, are known asthamagens.</li> </ul>

## ABC 2. Identification of Risks and Impacts

<b>Production Department</b>	Biosecurity: outbreak of epizootic diseases.	Low	Extreme	<ul style="list-style-type: none"> <li>Company has already experienced an outbreak of highly pathogenic avian influenza</li> </ul>
<b>Production Department (feed handling)</b>	Product recall due to arsenic accumulation in the chicken meat.	Medium	High	<ul style="list-style-type: none"> <li>Feeding Roxarson<sup>®</sup> to chickens increases concentrations of inorganic arsenic in chicken livers.</li> </ul>
<b>Human resources</b>	Possibility of inadequate worker protection during the hiring of temporary workers during high labor periods.	Low	High	<ul style="list-style-type: none"> <li>Absence of adequate HR policies, temporary workers may be subjected to inadequate wages, long working hours or other forms of discrimination.</li> </ul>

### ABC FOOD COMPANY Action Plan

- Based on its Risk Assessment Form, ABC prioritized the following five key risks:
- excess water usage, leading to inaccessibility of potable water by homeowners and communities and brine contamination of coastal area wells;
- high volume of wastewater, with biochemical and chemical oxygen demand from organic waste, entering and contaminating surface waters;
- high volume of solid organic waste with pathogenic content, affecting ground and surface waters and food safety;
- inadequate contracts and protection for migrant workers due to the use of recruitment agency; and
- discrimination, disciplinary abuse and harassment due to growing number of disputes between workers, especially migrant workers, and supervisors.

ABC then developed Action Plans to manage these five risks (see below)

## ABC 3. Management Programs

### Risk 1:

Contamination of nearby river due to inappropriate management of poultry waste

MITIGATION HIERARCHY	ACTION	OBJECTIVE AND TARGET	DEADLINE	RESPONSIBLE STAFF	RESOURCES REQUIRED	OPERATIONAL PROCEDURES
Avoid	<ul style="list-style-type: none"> <li>- Build permanent animal waste storage and composter shed with fixed roof and concrete floor to avoid contamination of storm water and groundwater (i.e. collect leachate)</li> <li>- Set up shed away from watercourses and wells as required by local regulations</li> </ul>	Objective: Prevent contaminated storm water and leachate from entering local water bodies Target: 100% reduction	6 months	<ul style="list-style-type: none"> <li>- Operations manager</li> <li>- Environment manager</li> </ul>	Staff time intensity: Medium Capital intensity: High	<ul style="list-style-type: none"> <li>- Procedure for composting poultry litter</li> </ul>
Minimize	<ul style="list-style-type: none"> <li>- Apply on/off farm fields only mature compost</li> </ul>	Objective: Prevent contaminated storm water and leachate from entering local water bodies Target: 100% reduction	2 months	<ul style="list-style-type: none"> <li>- Operations manager</li> <li>- Environment manager</li> </ul>	Staff time intensity: Low Capital intensity: Low	<ul style="list-style-type: none"> <li>- Procedure for testing compost maturity</li> </ul>
Compensate/offset	<ul style="list-style-type: none"> <li>- Identify affected families</li> <li>- Contract drinking water delivery service</li> </ul>	Objective: Provide drinking water supply to affected community members until safe water supply is restored Target: 4 litres of drinking water per person per day	Immediate until needed	<ul style="list-style-type: none"> <li>- Operations manager</li> <li>- CSR manager</li> </ul>	Staff time intensity: Medium Capital intensity: Medium	<ul style="list-style-type: none"> <li>- Community engagement and grievance redressal procedure</li> </ul>

## ABC 3. Management Programs

### Risk 2:

Arsenic contamination in local water resources

MITIGATION HIERARCHY	ACTION	OBJECTIVE AND TARGET	DEADLINE	RESPONSIBLE STAFF	RESOURCES REQUIRED	OPERATIONAL PROCEDURES
Avoid	-Stop procurement and use of Roxarson <sup>®</sup> or any other banned feed additive -Dispose of all existing stock of Roxarson <sup>®</sup> in an environmentally appropriate manner	Objective: Use arsenic free feed Target: 100% elimination of additives containing arsenic	1 month	- Operations Manager	Staff time intensity: Low Capital intensity: Low	- Procedure for procurement of feed material - Procedure for evaluation and selection material suppliers - Procedure for disposal of hazardous substances

### Risk 3:

Chicken mortality due to overcrowding

MITIGATION HIERARCHY	ACTIONS	OBJECTIVE AND TARGET	DEADLINE	RESPONSIBLE STAFF	RESOURCES REQUIRED	OPERATIONAL PROCEDURES
Avoid	-Build 3 new chicken houses	Objective: Prevent chicken mortality Target: 50% mortality reduction	12 months	- Operations Manager - Engineering and Maintenance Manager	Staff time intensity: Low Capital intensity: High	- Procedure for controlling maximum stock density
Minimize	-Install, maintain and repair ventilation systems and ensure they have the appropriate capacity for the number of birds being housed in the building.		3 months	- Operations Supervisor/foreman - Maintenance Manager	Staff time intensity: Medium Capital intensity: Low	- Procedure for operation and maintenance of ventilation fans



## ABC 3. Management Programs

### Risk 4:

Workers' exposure to hazardous/toxic air borne contaminants including asthmagens (poultry dust) resulting in respiratory diseases

MITIGATION HIERARCHY	ACTION	OBJECTIVE AND TARGET	DEADLINE	RESPONSIBLE STAFF	RESOURCES REQUIRED	OPERATIONAL PROCEDURES
Avoid	<ul style="list-style-type: none"> <li>-Establish and maintain work-zone air quality requirements.</li> <li>-Install, maintain and repair farm's mechanical ventilation system and ensure they have the appropriate capacity for the number of birds being housed in the building.</li> </ul>	<p>Objective: Comply with work-zone air quality requirements</p> <p>Target: 100% compliance</p>	3 months	<ul style="list-style-type: none"> <li>- Operations Manager</li> <li>- Engineering and Maintenance Manager</li> </ul>	<p>Staff time intensity: Medium</p> <p>Capital intensity: High</p>	<ul style="list-style-type: none"> <li>- Procedure for work-zone air quality monitoring</li> <li>-Procedure for operation and maintenance of mechanical ventilation system</li> </ul>
Minimize	<ul style="list-style-type: none"> <li>-Provide half masks equipped with filters designed to capture dust and microorganisms (N95, P100 HEPA if H5N1 suspected).</li> <li>-Provide health checks for early detection of respiratory symptoms.</li> <li>-Provide accessible complaint management system to allow workers to articulate issues of concern</li> </ul>	<p>Objective: Reduce workers with symptoms of respiratory diseases</p> <p>Target: 80% reduction</p>	1 month	<ul style="list-style-type: none"> <li>- Operations Supervisor/foreman</li> <li>- Maintenance Manager</li> <li>-OHS manager</li> </ul>	<p>Staff time intensity: Medium</p> <p>Capital intensity: Low</p>	<ul style="list-style-type: none"> <li>- Procedure for workers' training on OHS and PPEs requirements</li> <li>- Procedure for workers' health checks</li> <li>-Procedure for complaint management and resolution</li> </ul>
Compensate/Offset	<ul style="list-style-type: none"> <li>-Provide assistance to the affected workers for their treatment and recuperation.</li> </ul>	<p>Objective: Provide assistance (treatment/compensation) to affected workers</p> <p>Target: 100% of affected workers</p>	6 months	<ul style="list-style-type: none"> <li>- HR manager</li> </ul>	<p>Staff time intensity: Medium</p> <p>Capital intensity: High</p>	<ul style="list-style-type: none"> <li>- Rest &amp; Recuperation leave policy</li> </ul>

## ABC 3. Management Programs

### Risk 5:

Biosecurity risk- outbreak of epizootic diseases

MITIGATION HIERARCHY	ACTION	OBJECTIVE AND TARGET	DEADLINE	RESPONSIBLE STAFF	RESOURCES REQUIRED	OPERATIONAL PROCEDURES
Avoid	<ul style="list-style-type: none"> <li>-Monitor and maintain the list of notifiable and reportable diseases. Regular stock inspections to be conducted by qualified personnel</li> <li>-Monitor and record movement of birds, personnel, equipment and vehicle from one farm to another</li> <li>-Restrict human access to the farm property</li> <li>Monitor and ensure supply of safe feed material and water</li> <li>-Provide disinfectant footbaths or disposable plastic booties for visitors while walking around the farm</li> <li>-Keep containers of disinfectant handy (10% bleach or 1-2% Virkon solution; or 15 ml/liter Chemprocide) if equipment, or vehicle tires or undercarriages need to be washed off</li> <li>-Maintain quarantine procedures and facilities for suspected cases</li> </ul>	<p>Objective: Prevent outbreak of epizootic diseases</p> <p>Target: 100% protection from outbreak of epizootic diseases</p>	Ongoing	<ul style="list-style-type: none"> <li>- Operations Manager</li> <li>- Emergency Team</li> </ul>	<p>Staff time intensity: low</p> <p>Capital intensity: low</p>	<ul style="list-style-type: none"> <li>- Emergency management plan for epizootic disease outbreak</li> <li>- Procedure for stock inspection and handling of sick birds</li> <li>- Procedure for cleaning and disinfection</li> </ul>
Compensate/ Offset	<ul style="list-style-type: none"> <li>-Recall and safe disposal of all suspected/contaminated product from market.</li> </ul>	<p>Objective: Safe disposal of contaminated/s uspected product</p> <p>Target: 100% recall and safe disposal of suspected or infected product</p>	Immediate	<ul style="list-style-type: none"> <li>- Marketing and sales manager</li> <li>- Operations manager</li> </ul>	<p>Staff time intensity: Medium</p> <p>Capital intensity: High</p>	<ul style="list-style-type: none"> <li>- Product recall and disposal procedure</li> <li>- Procedure for communication with affected customers</li> <li>- Procedure for press and media release</li> </ul>

## ABC FOOD COMPANY Complaint Management and Resolution Procedure

Based on the Risk Identification Worksheet and Risk Assessment Prioritization Form, ABC identified poor worker health as an issue due to exposure to hazardous/toxic air borne contaminants resulting in respiratory diseases (see Risk 4). In order to receive and handle worker complaints more effectively on this risk, ABC created and adopted a Complaint Management Resolution Procedure as part of its Action Plan.

**Title:** Complaint Management and Resolution (Internal Grievance Procedure)

**Procedure number:** HR001

**Number of pages:** 3

### 1.0 Purpose and Scope:

- 1.1. Purpose: Establish a transparent process for workers to express concerns and file complaints, including anonymous complaints. Ensure there is no retaliation or discrimination against those that express concerns or file complaints. Ensure good worker-manager communications to enable workers to raise concerns before they become serious grievances.

The purpose of this procedure is to ensure that employee complaints are appropriately addressed and managed efficiently and effectively in reaching a resolution for all parties involved. This procedure provides information to managers and employees regarding the processes to be followed when managing employee complaints, focusing on the management and resolution of workplace issues at the local level.

- 1.2. Scope: Any complaint or dispute that may arise from a worker or worker organization.

All individual complaints shall be initiated at Step 1 (see below 4.0 Work Instructions) and shall, if necessary, proceed step by step to Step 5, when the resolution proposed shall be final and binding. Collective complaints and disputes will be handled in the same step-by-step approach as that for individual complaints, but shall begin at Step 2 (see below 4.0 Work Instructions).

Issues will inevitably arise from time to time; since disputes are potentially harmful to the company, its workers, supervisors and managers at every level, all parties will be expected to resolve all but the most complex difficulties without recourse to Step 5 of this procedure.

The worker organization filing the complaint or representing the worker filing the complaint shall have the right to be notified and be present at all steps of the procedure.

Every effort should be made to settle the issue at each step and until this procedure has been completed there shall be no threats of “go-slows,” partial or general stoppages of work or other illegal action or lock-out

### 2.0 Definitions:

- 2.1 Grievance: Specific violation or feeling of having been wronged – the reason for filing a complaint.
- 2.2 Complaint: The formal communication of a grievance to the appropriate parties.

### 3.0 Responsibilities:

HR Department

### 4.0 Work Instructions:

Step 1:

- 4.1. The worker presents the complaint or grievance verbally to the most immediate supervisor, who has the authority to make adjustments in the matter, within 14 days. Explanations of responses to complaints, even if only to alert workers to a delay in the process, are key to ensuring workers understand their complaints are respected and taken seriously.
  - 4.2. The supervisor records the complaint or grievance and the action taken in the complaints log.
- Step 2:
- 4.3. If a satisfactory settlement is not reached in Step 1 within three days, or if the worker fears making the complaint directly to the most immediate supervisor, then a worker representative may present the complaint verbally to the supervisor concerned. The worker may choose to remain anonymous.

Step 3:

- 4.4. If a satisfactory settlement is not reached in Step 2 within three days following its completion, the worker or his or her chosen representative for the case may present the complaint to the department head. The complaint shall be in writing and shall state the complainant(s) or grievant(s) name(s).

Step 4:

- 4.5. If a satisfactory settlement is not reached in Step 3 within five days of the date of submission of the written complaint or grievance to the department head, the worker or his or her chosen representative for the case may present the complaint or grievance to the head of the Human Resources Department.
- 4.6. The head of the Human Resources Department or his/her designee shall schedule a meeting to be held within fourteen days of the receipt of the complaint or grievance with the worker or his or her chosen representative, for the purpose of attempting to resolve the complaint or grievance.
- 4.7. The worker can bring one or two peers for support during this meeting; those workers will also be covered under the non-reprisal clause.
- 4.8. The head of the Human Resources Department or his/her designee shall respond in writing within seven days of the date of the meeting.

Step 5:

- 4.9. If the complaint or grievance is not resolved at Step 4, and it is clear that resolution within the company is impossible, the worker or his or her chosen representative may refer the complaint or grievance to the Labor Ministry for resolution.

Monitoring:

- 4.10. The Human Resources Department will conduct a quarterly review of all complaints and actions taken. It will review the complaint logs of each supervisor and department head to evaluate the effectiveness of the grievance procedure and resolutions.
- 4.11. As part of the quarterly review, the Human Resources Department will follow up directly with the worker or his or her chosen representative to make sure there has been no retaliation.
- 4.12. The Human Resources Department will maintain a central record of all complaints and resolutions.

5.0 **Reference Documents:** Related Policy: Labor and Working Conditions – Grievance Mechanism; Brazilian national and local labor law

6.0 **Records:** Complaint Log; Complaint Investigation File; Complaint Resolution Report and Communication

7.0 **Approving Authority:** Senior Manager of HR

8.0 **Issue Date:** January 1, 2013

9.0 **Revision Date:** February 1, 2014

## ABC 4. Organizational Capacity and Competency

### ABC CHICKEN COMPANY Training Plan

ABC developed a simple Training Plan to raise awareness and provide its employees with the skills needed to implement the ESMS, its Action Plans and related procedures. ABC was able to participate in a local government program that provided subsidized training in these areas.

DEPARTMENT	MODULE 1	MODULE 2	MODULE 3	MODULE 4
<b>Human Resources/EHS/ESMS Performance team</b>	Introduction to ESMS; Labor standards	Applicable Environment, OHS and Labor regulations	Complaint management and resolution procedure	Worker-manager communications
<b>All workers and managers</b>	Health and safety and emergency response procedures	Waste minimization and waste management procedures	Social and labor policies; Disciplinary procedures	Worker-manager communications
<b>Purchasing Department</b>	Information on banned and restricted substances			
<b>Production</b>	Bird handling; handling and disposal of mortality waste; production processes	Waste minimization and waste management procedures	Biosecurity and epizoonoses; Food safety	Health and safety and emergency response procedures
<b>Senior management</b>	Introduction to ESMS	Labor standards Environmental and OHS standards	Biosecurity and epizoonoses; Food safety	Stakeholder and community engagement and communications

## ABC 4. Organizational Capacity and Competency

ABC developed a Roadmap to estimate the staff time required and the timeframe to develop and implement their ESMS. They estimated a total of 167.25 days of time from senior management, middle management, supervisors and workers.

### Roadmap and Estimated Timeframe for Developing and Implementing ABC CHICKEN COMPANY'S ESMS

ACTIVITY		TIME SPENT				MONTH																																
						1		2		3		4		5		6																						
1. Policy		Senior mgt time	Mid-mgt time	Supervisors time	Workers time																																	
Developing	Kick-off meeting at senior management level to discuss ESMS implementation	.5				■																																
	Selection (including communication/ coordination) of ESMS core team (personnel from different key departments)	.25	.5	.5		■																																
	Appreciation/awareness workshop for senior management and core team on ESMS requirements	2	2	4		■																																
	Review/upgrading of existing environment and social policy. Or formulation of organization's environmental and social policy	.5	1	2		■	■	■	■	■	■																											
Implementing	Design, printing and display of ESMS policy in key areas		.5	1	3					■	■	■																										
	Uploading of ESMS policy on company website		.25	.25							■																											
	Communication of ESMS policy to key external stakeholders	.5	.5									■	■																									
	Training and awareness-raising of employees on ESMS policy and information dissemination	2	2	3	10								■	■	■	■	■	■	■	■	■	■																

# ABC 4. Organizational Capacity and Competency

2. Risk and Impact Identification		Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTHS																								
						1				2				3				4				5				6				
Developing	Mapping of activities, processes and key stakeholders, including the suppliers and contractors	.5	2	2		█																								
	Identification and compilation of regulatory and other requirements, including stakeholder expectations	.5	2	1		█																								
	Initial environment and social review, identification and evaluation of environment and labor risks (including supply chain)	2	5	8	6		█																							
Implementing	Training and awareness of employees on environmental, social and labor risks and risks identification process		2	4	16		█																							
	Training and awareness of employees on regulatory and other requirements, including stakeholder expectations		2	2	10			█																						
	Training and awareness-raising of employees on environment, social and labor risks and information dissemination		3	3	12						█																			

## ABC 4. Organizational Capacity and Competency

3. Management Programs		Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTHS									
						1	2	3	4	5	6				
Developing	Preparation of ESMS manual (formulation and documentation of procedures related to ESMS)	3	8	10											
	Formulation, compilation of environmental objectives/targets and social performance improvement measures	.5	1	2	2										
	Formulation and development of environment and social action plans	1	4	4											
	Development of operational procedures	2	6	8	4										
Implementing	Communication, awareness-raising and training of employees on ESMS procedures	.5	4	4	12										
	Communication and awareness of employees on environmental objectives and social performance improvement measures	.25	.5	1	8										
	Communication and awareness of employees on environmental and social action plans		.25	1	8										
	Training of employees on environmental and social operational procedures		4	4	20										

4. Organizational Capacity and Competency		Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTHS									
						1	2	3	4	5	6				
Developing	Environmental and social awareness program for middle management		5												
	Environmental and social awareness program for workers				10										
	Competency program for ESMS core team		4	4											
	Internal auditor training for the organization's ESMS assessors/auditors		4	4											
Implementing	General awareness-raising and training on environment, social and labor issues/ESMS for senior and middle management	2	3												
	Environmental and social awareness program for workers		3	6	10										
	Competency program for ESMS core team		4	4											



# ABC 4. Organizational Capacity and Competency

Internal auditor training for the organization's ESMS assessors/auditors		4	4																							
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5. Emergency Preparedness and Response		Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTHS																								
						1				2				3				4				5				6				
Developing	Review key risks and existing emergency preparedness plan	.25	2	2																										
	Upgrade/prepare emergency preparedness plan	.25	3	5																										
	Communicate to workers, potentially affected communities and relevant government agencies (if required)	.25	.5																											
Implementing	Raise awareness and communication to employees and affected communities on key risks and emergency issues and emergency planning	.25	1	2	8																									
	Training of employees on emergency preparedness plan	2	2	4	20																									
	Communication and awareness-raising on emergency procedures to affected communities and relevant authorities (if required)	.25	1																											

6. Stakeholder Engagement		Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTHS																								
						1				2				3				4				5				6				
Developing	Mapping of all stakeholders, stakeholder analysis and engagement planning	.25	2	1																										
	Develop/upgrade stakeholder communication/consultation; information disclosure and engagement strategy/program	.25	3																											
Implementing	Communication to employees on key stakeholders and their environment and social/labor expectations		1	1	8																									
	Communication, awareness-raising and training of employees on the strategy/program for stakeholder engagement/consultation/communication and information disclosure		1.5	3	8																									

## ABC 4. Organizational Capacity and Competency

7. External Communication and Grievance Mechanism		Senior mgt time	Mid-mgt time	Super-visors time	Workers time	MONTHS																
						1			2			3			4			5			6	
Developing	Review external communication system, including receiving and handling feedback, concerns and complaints		1																			
	Develop/upgrade system for regular engagement, receiving, documenting and responding to feedback and grievances	.25	2	1																		
Implementing	Review external communication, feedback, stakeholder concerns and complaints and communicate to key personnel	.25	2	2	6																	
	Training, awareness-raising and implementation of stakeholder engagement, receiving, documenting and responding to feedback and grievances		2	2	6																	

8. Ongoing Reporting to Affected Communities		Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTHS																
						1			2			3			4			5			6	
Developing	Review existing system for reporting and disclosure		1																			
	Develop/upgrade system for external reporting and disclosure (including collection, validation and verification of information)	.25	2	1																		
Implementing	Communication and disclosure to key external stakeholders and affected communities	.25	2.5																			
	Communication, awareness-raising and training on external reporting and disclosure (including collection, validation and verification of information)		4	2	8																	

# ABC 4. Organizational Capacity and Competency

9. Monitoring and Review		Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTHS														
						1		2		3		4		5		6				
Developing	Establish procedure to monitor and measure ESMS performance, compliance and stakeholder requirements	.25	1	.5																
	Implementation of ESMS monitoring program, establishing benchmarks and integration with existing system	.25	4	2																
	Final review and complete ESMS documentation	.25	1	1.5																
	Conduct internal audit/evaluation of ESMS performance against the management program requirement/benchmarks		1	2	2															
	Establish relevant operational controls and formulation of corrective and preventive actions	.25	.5	2	6															
	Review by the senior management to assess performance and effectiveness of ESMS	.25	.5	1																
Implementing	Documentation and communication on ESMS conformance, regulatory compliance and stakeholder requirements		2	4																
	Communication, awareness, training and implementation of ESMS monitoring program and established benchmarks	.25	2	4	8															
	Communication of internal audit/performance measurement findings and ESMS performance to the employees		.5	1	4															
	Communication, awareness and training of employees on operational controls and corrective and preventive actions		.5	2	8															
	Communication on outcomes of review of the ESMS performance by senior management and key decisions taken	.25	.5																	
	<b>TOTAL</b>	<b>24.5</b>	<b>124.5</b>	<b>132.75</b>	<b>223</b>															

## ABC | 5. Emergency Preparedness and Response

Based on ABC's risk assessment, which identified outbreaks of epizootic diseases as a severe impact risk, ABC developed an Emergency Preparedness and Response Plan to identify, prevent and respond to the epizootic diseases. The plan includes an Epizootic Diseases Response Procedure. The roles and responsibilities of the different departments and personnel at ABC in the event of an epizootic related poultry emergency are outlined in the procedure in Section I of this Toolkit.

### **ABC CHICKEN COMPANY Epizootic Outbreak Disease Response Procedure**

See sample Epizootic Disease Response Procedure in Section I of this Toolkit.

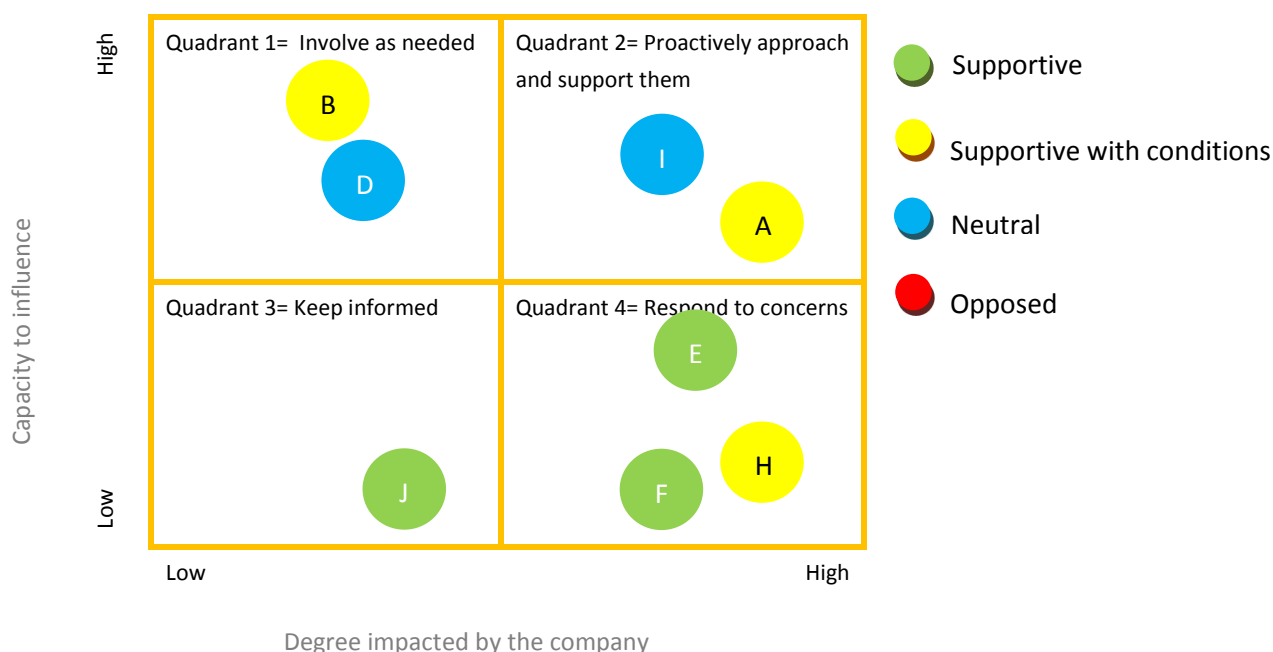
## ABC 6. Stakeholder Engagement

### ABC CHICKEN COMPANY Stakeholder Mapping – identification and analysis

An ABC cross-departmental team brainstormed and **listed the stakeholders** that are **affected by or have an interest in** the company's operations. The team then discussed and **listed their key concerns, issues and interests**. To identify those, they looked back at the environmental and social key risks and impacts previously identified (see Chapter 2. *Identification of Risks and Impacts – ABC Case Study*) and how these affect the surrounding communities.

STAKEHOLDER	ISSUES/CONCERNS/INTERESTS
a. Local village population (affected community)	Contamination of local water resources
b. Brazilian Institute of Environment and Renewable Natural Resources (regulator)	Regulatory compliance; impact on local water resources
c. Environmental NGOs	Arsenic contamination in local water supply
d. Local media (newspapers and other media organizations)	Food safety; bio-security
e. ABC's workers	Working conditions; occupational health and safety conditions; availability of adequate PPEs
f. Contract workers	Working conditions; occupational health and safety conditions; availability of adequate PPEs
g. Workers' union	Working conditions; occupational health and safety conditions; availability of adequate PPEs
h. Local farmers	Management of poultry waste as fertilizer

Then, ABC **mapped the stakeholders** on a matrix according to the degree to which they are impacted and their ability to influence the company operations. Finally, ABC **categorized** them based on their current relationship with the company: supportive, supportive with conditions, neutral, opposed. Based on this, they defined their **engagement method** with each group.



## ABC | 6. Stakeholder Engagement

### ABC CHICKEN COMPANY Stakeholder Engagement Plan

Based on the information above, ABC prepared a Stakeholder Engagement Plan.

STAKEHOLDER ENGAGEMENT PLAN				
Stakeholder	Concerns	Engagement method	Information to disclose and report back	Most valuable info to obtain
A. Local village population (affected community) (Quadrant-2)	Contamination of local water resources affecting irrigation water and drinking water supply.	<ul style="list-style-type: none"> <li>- <b>Grievance mechanism</b></li> <li>- Quarterly <b>meetings</b> with members of the local community</li> <li>- <b>Participatory monitoring</b> of ground and surface water quality</li> </ul>	<ul style="list-style-type: none"> <li>- Progress on solid waste management program to prevent water contamination</li> <li>- Results of surface and groundwater quality monitoring</li> </ul>	<ul style="list-style-type: none"> <li>- Key community concerns</li> <li>- Identification of affected areas</li> </ul>
I. Customers (retailers, local restaurants) (Quadrant-2)	Food safety; bio-security; product quality; brand reputation	<ul style="list-style-type: none"> <li>- <b>Grievance mechanism</b> through telephone hotline</li> <li>- Well-briefed <b>communications staff</b> to address consumer concerns</li> </ul>	<ul style="list-style-type: none"> <li>- Progress on actions and procedures related to food safety and bio-security</li> <li>- Policies on customer satisfaction</li> </ul>	<ul style="list-style-type: none"> <li>- Own performance on food safety and biosecurity</li> <li>- Performance benchmarks in local and international market</li> </ul>
B. Brazilian Institute of Environment and Renewable Natural Resources (regulator) (Quadrant-1)	Regulatory compliance; impact on local water resources	<ul style="list-style-type: none"> <li>- <b>Submission</b> of annual environmental monitoring report</li> <li>- Biannual <b>meetings</b> to update progress on ABC's environmental programs</li> </ul>	<ul style="list-style-type: none"> <li>- Progress on environmental (i.e. solid waste management) programs</li> <li>- Results of environmental monitoring</li> <li>- Number/instances of noncompliance and measures taken</li> <li>- Details of ongoing and redressed environmental grievances</li> </ul>	<ul style="list-style-type: none"> <li>- Information on current and proposed regulations</li> <li>- Fines related to environmental non compliance</li> <li>- Available pollution control technologies</li> </ul>
C. Environmental NGOs: <i>Name 1, Name 2.</i> (Quadrant-1)	Arsenic contamination in local water supply	<ul style="list-style-type: none"> <li>- Quarterly <b>on-site meetings</b> with NGOs representatives</li> </ul>	<ul style="list-style-type: none"> <li>- Progress on elimination of banned feed additives</li> <li>- Procedures for procurement and utilization of controlled feed additives</li> <li>- Results of surface and groundwater quality monitoring</li> </ul>	<ul style="list-style-type: none"> <li>- Key community concerns</li> </ul>
D. Local media (newspapers and other media)	Food safety; bio-security	<ul style="list-style-type: none"> <li>- Well-briefed <b>communications staff</b> to respond local media correspondents'</li> </ul>	<ul style="list-style-type: none"> <li>- Progress on actions and procedures related to food safety and bio-security</li> </ul>	<ul style="list-style-type: none"> <li>- Own performance on food safety and biosecurity</li> <li>- Performance</li> </ul>

## ABC 6. Stakeholder Engagement

organizations) (Quadrant-1)		request for information - Annual <b>on-site meeting</b> with local media correspondents	- Progress on solid waste management program	benchmarks in local and international market
G. Workers' union (Quadrant-1)	Working conditions; occupational health and safety conditions; availability of adequate PPEs	- Regular updates through <b>quarterly emails</b> to trade union representatives	- Progress on Action Plan to address workers' exposure to poultry dust - Status of EHS objectives and targets - Working conditions	- Workers' concerns and expectations
E. ABC's workers (Quadrant-4)	Working conditions; occupational health and safety conditions; availability of adequate PPEs	- <b>Monthly meetings</b> of workers with Production Department Head - Regular updates through quarterly <b>notice boards</b>	- Progress on Action Plan to address workers' exposure to poultry dust - Status of EHS objectives and targets - Complaint management and resolution procedure - Filled complaints and resolutions	- Employees concerns/expectations and complaints
F. Contract workers (Quadrant-4)	Working conditions; occupational health and safety conditions; availability of adequate PPEs	- <b>Monthly meetings</b> of workers with Production Department Head - Regular updates through quarterly <b>notice boards</b>	- Progress on Action Plan to address workers' exposure to poultry dust - Status of EHS objectives and targets - Complaint management and resolution procedure for contract workers - Filled complaints and resolutions	- Contract workers' concerns/expectations and complaints
H. Local farmers (Quadrant-4)	Management of poultry waste as fertilizer	- <b>Grievance mechanism</b> - Quarterly <b>meetings</b> local farmers utilizing poultry waste as fertilizer	- Progress on Action Plan to address solid waste management (composting) - Best practices for the application of composted poultry waste - Results of surface and groundwater quality monitoring	- Fertilizing practices - Identification of sources of water pollution
J. Feed suppliers (Quadrant-3)	Information on feed quality; profitability; brand and reputation	- Periodic <b>e-mail/phone communication</b> pertaining to quality of feed material	- Quality requirements related to feed material - Quality concerns/complaints related to feed supply	- Regulatory requirements on feed material - Database of banned and restricted material

## Key Aspects of ABC CHICKEN COMPANY'S Grievance Mechanism

ABC implemented a grievance mechanism for external stakeholders. Below are key aspects of ABC's grievance mechanism:

KEY ASPECTS OF EFFECTIVE GRIEVANCE MECHANISMS	ABC'S METHOD
<b>Provide ease of access to confidentially communicate or file complaints, including anonymous ones</b>	ABC's website has a form and instructions that people can fill out and submit online.
<b>Publicize the system so that stakeholders know it exists and how to access it</b>	ABC distributes a company brochure highlighting its company profile and operations, which includes instructions for how external stakeholders can communicate or file complaints. The brochure is circulated to community leaders at churches, schools and civic centers. The system is also documented in the company procedures manual. A designated community liaison explains this further when meeting with stakeholders. ABC displays the details of available communication channels (contact name, e-mail, phone, visiting hours) prominently at the farm's main gate.
<b>Foster sense of legitimacy and trust; encourage dialogue and shared responsibility for outcomes</b>	ABC has its major cases reviewed by a formal oversight body, consisting of a representative from each of its key stakeholder groups. It also provides transparent funding for expert resources, so that any collection of evidence is independent and unbiased. It makes sure not to undermine existing legal mechanisms.
<b>Be transparent about the process and outcomes</b>	All cases are summarized and posted on the company website, with details about whether the complaint is accepted or not, and the process and timeline for investigation and resolution.
<b>Implement a predictable and defined process that includes assignment of responsibility, time limits and monitoring of outcomes</b>	ABC has a procedure that designates the community liaison to receive and record the complaint and then work with relevant staff and external stakeholders to investigate, determine actions and report back on outcomes.
<b>Make the system a source of continual learning</b>	ABC's oversight stakeholder body meets quarterly with the management team to measure the effectiveness of the system and review complaints to check for resolution and ensure that cumulative learning is integrated into company systems. They agree and monitor key performance indicators and revise the mechanism as appropriate.



## ABC | 8. Reporting Back to Affected Communities

ABC regularly reports the local village population (affected communities) on the progress of its commitments to resolve tissues identified when communicating with them through its stakeholder engagement process and through its grievance mechanism. Reports are presented in the local language and a clear format during quarterly meetings with the local village.

## Monitoring Plan for ABC

ABC's ESMS team developed a Monitoring Plan based on the Action Plans and their targeted objectives.

**Risk 1: Contamination of nearby river due to inappropriate management of animal waste (poultry litter)**

Objective: Prevent contaminated storm water and leachate from entering local water bodies

Target: 100% reduction

PERFORMANCE INDICATORS		
Monitoring indicators	Monitoring records	Equipment
Quality of nearby surface and ground water	- Water analysis records	- Outsourced to external laboratory
Quality of storm water runoff	- Storm water analysis records	- Water quality kit
Quality and maturity of produced compost	- Compost C:N ratio, phytotoxicity, and stability analysis records	- Compost lab testing equipment

PROCESS INDICATORS	
Monitoring indicators	Monitoring records
Location of waste storage and composter shed	
Number of production staff trained on solid waste handling	- Training records

Objective: Provide drinking water supply to affected community members until safe water supply is restored

Target: 4 litres of drinking water per person per day

PERFORMANCE INDICATORS	
Monitoring indicators	Monitoring records
Volume (liters) of drinking water/person/day	- Daily records from water tank deliveries

PROCESS INDICATORS	
Monitoring indicators	Monitoring records
Number and percentage of grievances presented by affected communities related to access to drinking water that have been resolved	- Grievances log

## ABC | 9. Monitoring and Reporting

### Risk 2: Arsenic contamination in the local water supply due to use of feed additives

Objective: Use arsenic free feed

Target: 100% elimination of additives containing arsenic

PERFORMANCE INDICATORS		
Monitoring indicators	Monitoring records	Equipment
Amount of Roxarsone <sup>®</sup> stock sent to disposal	- Contract with qualified hazardous waste disposal company	- Weighing scale
Name and quantity of feed additives per lot	- Feed additives procurement records - Feed mixing records	- Weighing scale
Name and quantity of administered veterinary drugs per lot	- Veterinary records log	

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Number of trainings provided to the purchasing department on restricted and banned substances	- Training records
Number of inspections carried out	- Monitoring and inspection records - List of banned and restricted substances

### Risk 3: Chicken mortality due to overcrowding

Objective: Prevent chicken mortality

Target: 50% mortality reduction

PERFORMANCE INDICATORS		
Monitoring indicators	Monitoring records	Equipment
Number and percentage of dead chickens per lot	- Production records	
Bird density in poultry houses	- Production records	
Atmospheric conditions in poultry houses (i.e. ambient temperature, relative humidity)	- Production records	- Meteorological data monitoring equipment
Air flow in the chicken house (Recommended air flow: minimum 0.1 cu. Feet per minute per pound of body weight of the chickens in the house for each 1° F of outside air at 30-60% RH)	- Chicken house air quality monitoring reports	- Air flow meter
Air quality inside chicken house (Desirable: CO <sub>2</sub> < 1%; CH <sub>4</sub> < 1%; NH <sub>3</sub> < 40 ppm; H <sub>2</sub> S < 40 ppm; O <sub>2</sub> > 16%)	- Chicken house air quality monitoring reports	- Indoor air quality measuring instrument

## ABC | 9. Monitoring and Reporting

PROCESS INDICATORS	
Monitoring indicators	Monitoring records
Frequency of preventive maintenance for chicken house ventilation system	- Records of maintenance and repairs of ventilation system (fans, thermostats, timers, etc.)
Frequency of breakdown maintenance for ventilation system	- Records of maintenance and repairs of ventilation system (fans, thermostats, timers, etc.)

### Risk 4: Workers' exposure to hazardous/toxic air borne contaminants including asthamagens resulting in respiratory diseases

Objective: Comply with work-zone air quality requirements

Target: 100% compliance

PERFORMANCE INDICATORS	
Monitoring indicators	Monitoring records
Air quality in poultry houses and other work zone areas (Minimum air quality requirements inside chicken house: CO <sub>2</sub> < 1%; CH <sub>4</sub> < 1%; NH <sub>3</sub> < 40 ppm; H <sub>2</sub> S < 40 ppm; O <sub>2</sub> > 16%; particulate matter, dust and other airborne contaminants as regulated by local regulatory requirements or industry best practices)	- Chicken house and other work zone air quality records (i.e. concentration of air borne contaminants)

PROCESS INDICATORS	
Monitoring indicators	Monitoring records
Frequency of preventive maintenance for chicken house ventilation system	- Records of maintenance and repairs of ventilation system (fans, thermostats, timers, etc.)
Frequency of breakdown maintenance for ventilation system	- Records of maintenance and repairs of ventilation system (fans, thermostats, timers, etc.)

Objective: Reduce workers with symptoms of respiratory diseases

Target: 80% reduction

PERFORMANCE INDICATORS		
Monitoring indicators	Monitoring records	Equipment
Number and percentage of workers with symptoms of respiratory diseases	- OHS and medical records	Outsourced
Number of lost work days due to illnesses related to respiratory diseases	- OHS and medical records	

## ABC | 9. Monitoring and Reporting

PROCESS INDICATORS	
Monitoring indicators	Monitoring records
Number and percentage of workers provided with regular health checks	- Medical records
Number and type of PPEs (masks: N95, P100 or any other) provided to workers	- Records of PPEs purchased, distributed and disposed off
Number and percentage of production workers trained on waste handling and use of PPEs	- Training records
Posters and signage on respiratory protection provided at the facility	

### Risk 5: Biosecurity - outbreak of epizootic diseases

Objective: Prevent outbreak of epizootic diseases

Target: 100% protection from outbreak of epizootic diseases

PERFORMANCE INDICATORS		
Monitoring indicators	Monitoring records	Equipment
Number of notifiable and reportable diseases detected	- Stock inspection reports	
Number of suspected birds quarantined or disposed off	- Bird disposal records	

PROCESS INDICATORS	
Monitoring indicators	Monitoring records
Amount of disinfectants consumption	- Purchase records
Frequency of stock inspections	- Stock inspection reports
Frequency and number of training and retraining provided on sanitary and disinfection procedures/requirements	- Training records
% of suppliers trained on safe supply of feed	Training logs

# XYZ Livestock Development Company, Ethiopia

XYZ Livestock Development Company (XYZ) is a privately held cattle farming company in Ethiopia, which has operated for the last thirty years in the Oromia Region. XYZ is mid-sized company with a cattle population of approximately 1,500 heads per batch and a processing capacity of four (4) batches per year. The major part of the business is the cattle fattening operation, which involves purchasing locally sourced cattle between the ages of 18-24 months and then fattening them over a three month period. Once the cattle have attained the desired mass, they are sold to abattoirs, butcheries and supermarkets.

The company produces both for the domestic and export market. However, it has not been able to realize its full potential due to several constraints, such as inadequate nutrition and frequent cattle diseases. As feed represents the largest annual operating cost, the company has made several attempts in the last few months to cut spending. Crop residues and rendered feed from local suppliers are currently being used as feed material, but the company has yet to establish a mechanism for overseeing the quality and source of feed. During a recent inspection by one of its overseas buyers, the food safety auditors raised a concern that there could be a **risk of the use of Specified Risk Material (SRM)** in the low cost feed. Bovine Spongiform Encephalopathy (BSE) was identified as one of the potential risks and the auditors found the company lacked a system for monitoring the quality and source of the rendered feed. The auditors have recommended that the company work with its feed suppliers and maintain records sufficient to track the material from its processing and distribution through its receipt by buyers such as XYZ. This problem has been highlighted in the export market. Some of the heavily publicized outbreaks of foodborne diseases in the last few years have raised awareness on the need to ensure food quality and safety. With recent events in Europe on the discovery of horse and other meat traces in products claimed to be 100% beef, there is an increased demand for stricter traceability requirements. The company has identified on-farm food safety as one of the key areas to focus on in the coming months and plans to implement a system to improve its competitiveness of livestock and meat export, quality of meat, and chain of custody traceability in its value chain.

While quality and safety of meat is an issue in the value chain, so are labor practices. An international NGO has identified cattle herding in Africa as a **major source of child labor** that has gone unnoticed by the international community. According to its latest report, almost 60 percent of girls and boys (aged 5–17 years) in hazardous work are found in agriculture. The livestock sector is one of the fastest growing segments of the agricultural economy and represents a source of income and food security for 70 percent of the world's 880 million rural poor who live on less than USD \$1.00 a day. Within rural environments, livestock rearing has historical, cultural and traditional roots, and the involvement of children is very common. XYZ is aware that as a cattle rearing center, it sources from nearby nomadic farmers who offer competitively priced animals because they use the free labor of the whole family. XYZ local employees know that children as young as 5 or 7 herd cattle, sometimes far from their homes, with no possibility for schooling, and are vulnerable to the climate, physical and mental isolation, disease, long work hours and poor sanitation and hygiene. These children are also at risk of being gored, kicked, stamped or bitten by the herd and wild animals and insects. Some of the children are also known to be victims of trafficking and vulnerable to forced and bonded labor due to their parents' indebtedness. When some XYZ employees talk to the herders, they are given strong signals that the pastoralist communities recognize the importance of education for their children and would want to send their children to school if the education was relevant to the pastoral way of life, and especially if schooling could be combined with child work in the herd.

Finally, in the last few months, the company has been criticized for its poor environmental practices in waste management. Due to limited land availability, animals are crowded into relatively small areas and their **manure and urine are transported into a waste lagoon** on the adjoining land. These pits often rupture, leak or overflow, sending dangerous microbes, nitrate pollution and drug resistant bacteria into water supplies. Last month, the environmental authorities took water samples downstream of the Akaki River, which is one

of the major **community water sources, and found it to be contaminated with E. coli bacteria** attributed to XYZ's operations. Uncontrolled algae growth and damage to aquatic life in the river has been linked to phosphorous and nitrogen releases from the animal waste. The lagoon also emits toxic gases such as ammonia, hydrogen sulfide and methane, which have long been a cause of concern to the local community and more widely to local environmentalists because of their "**greenhouse effect.**" Currently, the company sprays the manure onto land as fertilizer and some of the villagers have complained that this brings still more of these **harmful substances into the air and water, as well as emitting odors.**

In order to improve its competitiveness in the international market, XYZ Company has decided to develop and implement environmental and social management systems and training programs, based on existing laws and regulations on labor, product safety, hygiene and best industry practices.

## XYZ LIVESTOCK COMPANY Policy Statement

XYZ had a long internal debate about adopting policies, especially those relating to labor and environmental requirements. The company felt it would be very hard to meet these requirements, given the operating environment. Finally, the CEO decided to proceed with the complete set of policies, because of his goal of selling internationally. The company established a three-year plan to try and achieve compliance with the policies and gain some type of international certification or recognition.

In addition to the complete set of environmental and social policies, the company prepared a shorter version of the organizational goals summarizing the most relevant points, and posted it in various locations:

XYZ - Our products, our environment, our people

- Together we produce safe and high-quality livestock, which create value and confidence for our customers and consumers.
- We are committed to conducting our operations in accordance with the environmental and labor laws and regulations that apply to our industry.
- We recognize that water is a valuable resource, and we commit to use it more efficiently.
- We commit to process organic solid waste, including manure to generate useful byproducts.
- We commit to prevent harmful child labor in our operations and work with our suppliers to improve labor issues in our supply chain.
- We strive for an injury-free workplace, ensuring that no young worker is employed in a hazardous job; our workers are not exposed to dangerous situations or hazardous chemicals; and that they use appropriate personal protective equipment.
- We are all - managers, supervisors and workers – jointly responsible for making our policy a reality.



## XYZ 2. Identification of Risks and Impacts

### XYZ LIVESTOCK COMPANY Risk Identification Worksheet

XYZ's ESMS team used the Risk Identification Worksheet below to identify those areas where problems are more likely to happen.

LABOR AND WORKING CONDITIONS RISKS		
RISK FACTORS	My company has the following conditions (circle the appropriate answer)	Potential negative impact (A "yes" response means that there is a potential negative impact)
There is a difference in nationality, race or religion between workers and managers.	<input checked="" type="radio"/> Yes/No	Discrimination. Disciplinary abuse and harassment.
We have an apprentice program that provides young workers with training and work experience.	<input checked="" type="radio"/> Yes/No	Forced labor. Child labor.
We use recruiting agencies and contract workers.	Yes/ <input checked="" type="radio"/> No	Inadequate wages, benefits and contracts. Forced labor.
We use homeworkers or contractors that use homeworkers.	Yes/ <input checked="" type="radio"/> No	Inadequate wages, benefits and contracts. Forced labor. Child labor.
We use seasonal or temporary workers.	<input checked="" type="radio"/> Yes/No	Inadequate wages, benefits and contracts. Excessive overtime.
Some of the workers in my company are migrants from another area.	<input checked="" type="radio"/> Yes/No	Forced labor. Discrimination.
We provide a dormitory for some or all of our workers.	Yes/ <input checked="" type="radio"/> No	Lack of freedom of movement. Lack of clean adequate space. Excessive charges for the use of the dormitory.
There are security guards at our company.	<input checked="" type="radio"/> Yes/No	Lack of freedom of movement. Harassment.
We are located in a free-trade zone.	Yes/ <input checked="" type="radio"/> No	Inadequate wages, benefits and contracts.
There are large fluctuations in orders and/or seasonality of production.	Yes/ <input checked="" type="radio"/> No	Excessive overtime. No payment of overtime due to hour-averaging. Layoffs.
There is a labor shortage in my area.	Yes/ <input checked="" type="radio"/> No	Child labor.
There is no history of collective bargaining, unions or other forms of worker representation at our company.	<input checked="" type="radio"/> Yes/No	Discrimination. Restriction on freedom of association and collective bargaining.
There is no procedure for workers to express their complaints (grievance mechanism).	Yes/ <input checked="" type="radio"/> No	Discrimination. Disciplinary abuse and harassment. Worker injuries and chronic conditions.
The organization has a history of collective dismissal(s) in the past or may be vulnerable to collective dismissal due to poor financial conditions.	Yes/ <input checked="" type="radio"/> No	Discrimination. Inadequate retrenchment procedures leading to termination payments and benefits that do not comply with national law.
Large equipment, such as tractors, front-end loaders, is used in our operation.	<input checked="" type="radio"/> Yes/No	Worker injuries and chronic conditions.
We have significant amounts of dust in the work zone (dust in an animal rearing facility may contain feed particles, animal or rodent	<input checked="" type="radio"/> Yes/No	Exposure to pathogens resulting in chronic conditions.

fecal dust, pollen, bacteria, shed skin cells, mould, insect parts, etc.)		
Our activities involve workers routinely interacting with machinery, equipment with sharp edges and/or slippery work surfaces.	Yes/No	Worker injuries and chronic conditions.
We have not identified all operations that require personal protective equipment (PPE). Not all workers are aware of the workplace hazards and how to use the appropriate PPE.	Yes/No	Worker injuries, Exposure to hazardous material and chronic conditions.
Our production activities involve hazardous materials or processes that could cause fires or explosions.	Yes/No	Worker injuries or casualties.
Our production area includes enclosures with large animals.	Yes/No	Worker injuries or casualties.
Our production area includes confined spaces.	Yes/No	Worker injuries or casualties.
Our operations include significant handling of animals by our workforce.	Yes/No	Worker injuries or casualties.
Electric powered pressure washers are used in our operations.	Yes/No	Worker injuries or casualties due to electrocution.
Our activities include significant lifting, carrying or repetitive motions.	Yes/No	Worker injuries and chronic conditions.
There are processes that involve lifting of heavy loads (e.g. lifting of animal feed, lifting during weaning, etc.)	Yes/No	Worker injuries and chronic conditions.
We have operations/areas with high noise levels (e.g. swine in confinement at feeding may have a noise level of 121 dB to 133 dB)	Yes/No	Hearing impairment.
Our production activities involve the handling of living and dead animals that can transmit diseases to humans.	Yes/No	Zoonotic diseases.
Our production activities involve the handling of animal blood, urine or feces without proper personal protection.	Yes/No	Zoonotic diseases.
Our workers don't have access to separate and clean areas for eating and changing clothes.	Yes/No	Worker illnesses.
Bathrooms are not properly cleaned and often lack running water, soap and toilet paper.	Yes/No	Worker illnesses.
Our primary suppliers would probably answer "Yes" to most of the questions above.	Yes/No	All of the above.

ENVIRONMENTAL RISKS		
RISK FACTORS	My company has the following conditions (circle the appropriate answer)	Potential negative impact (A “yes” response means that there is a potential negative impact)
Our operations require large quantities of fresh water.	<input checked="" type="radio"/> Yes/No	Groundwater depletion in the region. Contamination of ground or surface water sources in the region due to discharge of effluent. High energy consumption for treatment of raw or processed water.
We don't have sufficient fresh water supplies to meet our requirements.	<input checked="" type="radio"/> Yes/No	Local and regional groundwater depletion.
Our operations have high power requirements.	Yes/ <input checked="" type="radio"/> No	High energy consumption.
We require large quantities of fuel (gas/diesel/coal/etc.) for our operations (e.g. hot water, heating, etc.).	Yes/ <input checked="" type="radio"/> No	Air emissions. Solid waste (fly and bottom ash if coal is used).
We have various process and utility equipment which may generate air emissions (e.g. boiler, diesel generator set, incinerator, grinder, etc.).	Yes/ <input checked="" type="radio"/> No	Air emissions. Solid waste (e.g. waste from equipment maintenance, fly and bottom ash from coal-based boilers). Hazardous waste (e.g., waste oil, oil-soaked filters and rags). Liquid waste (e.g. boiler blow-down, waste oil). Noise generation.
We need to store large quantities of fodder and animal feed materials at site.	<input checked="" type="radio"/> Yes/No	Solid waste due to possible contamination or deterioration of animal feed. Gaseous or liquid emissions leading to water contamination due to fodder/animal feed degradation.
We have feed grinding operations at site.	<input checked="" type="radio"/> Yes/No	Dust generation. High noise levels at work zone.
We generate large (or significant) quantities of solid or liquid waste due to cleaning operations (e.g. manure).	<input checked="" type="radio"/> Yes/No	Solid waste. Liquid waste. Contamination of land, groundwater and/or surface water due to improper disposal of solid and liquid waste. Wastewater from cleaning. Energy and water consumption due to pressure washing.
We generate large (or significant) quantities of solid or liquid waste from packaging material, waste feed, pesticides, ventilation filters, used/spoilt medications.	<input checked="" type="radio"/> Yes/No	Solid waste. Liquid waste. Contamination of land, groundwater and/or surface water due to improper disposal of solid and liquid waste.
We have large manure collection and storage systems (e.g. belowground tanks, aboveground tanks, earth-banked lagoons, weeping wall stores, etc.).	<input checked="" type="radio"/> Yes/No	Solid waste. Liquid waste. Contamination of land, groundwater and/or surface water due to improper storage or leakage of solid and liquid waste. Emission of toxic gases and odor (e.g. ammonia, H <sub>2</sub> S, etc.). Exposure to wildlife and local communities.
We use the manure as fertilizers or provide it to the local communities who can use it as fertilizers.	<input checked="" type="radio"/> Yes/No	Land contamination. Ground or surface water contamination.

Animal mortality is high and animal carcasses are generated that need to be disposed.	<input type="radio"/> Yes/ <input checked="" type="radio"/> No	Solid waste. Contamination of land, groundwater and/or surface water due to improper disposal of animal carcasses.
We dispose of our solid waste in our landfill or city's landfill facility.	<input type="radio"/> Yes/ <input checked="" type="radio"/> No	Contamination of land, groundwater (due to leachate) and/or surface water (due to run-off). Impact on wildlife or fisheries. Diseases through vectors. GHGs generation (e.g. methane).
Our personnel, vehicles or farm animals move from one farm to another.	<input type="radio"/> Yes/ <input checked="" type="radio"/> No	Contamination or spread of animal diseases (epizootics and zoonotic diseases).
We generate large (or significant) quantities of wastewater (e.g. runoff from feed including silage, livestock housing, feeding and watering, floor cleaning, etc.).	<input type="radio"/> Yes/ <input checked="" type="radio"/> No	Contamination of ground and/or surface water due to improper disposal of wastewater.
We discharge our wastewater (process effluent) in a nearby river/lake/or any other water bodies.	<input type="radio"/> Yes/ <input checked="" type="radio"/> No	Contamination of receiving water body and aquatic life (high BOD <sub>5</sub> , COD, TSS). Eutrophication.
We treat our wastewater (process effluent) before discharge.	Yes/ <input checked="" type="radio"/> No	Energy consumption. Solid waste generation (e.g. sludge from treatment process). Land and/or water contamination due to improper disposal of waste.
We treat our sewage (from toilets, washrooms, etc.) before discharging it in the city's sewer line.	Yes/ <input checked="" type="radio"/> No	Energy consumption. Solid waste generation (e.g. sludge from treatment process). Land and/or water contamination due to improper disposal of solid waste.
We utilize our treated wastewater (process effluent) for irrigation (either by ourselves or provide it to community).	Yes/ <input checked="" type="radio"/> No	Contamination of land, groundwater (due to leachate), surface water (due to run-off) and/or crops if toxic chemicals are present in the treated wastewater.
We generate some hazardous or toxic waste (e.g. waste chemicals, expired veterinary drugs, used/waste oil/sludge from wastewater treatment plants based on chemical treatment, etc.).	<input type="radio"/> Yes/ <input checked="" type="radio"/> No	Contamination of land, groundwater (due to leachate) and/or surface water (due to run-off) if disposed improperly.
We require a large land area for our livestock operations.	<input type="radio"/> Yes/ <input checked="" type="radio"/> No	Loss of natural habitats or agricultural land. Air, water and/or land pollution based on expansion requirements and infrastructure development.
Our operations may have an impact on the surrounding forest or wildlife (e.g. overgrazing, land degradation, etc.).	<input type="radio"/> Yes/ <input checked="" type="radio"/> No	Loss of native species. Impact on biodiversity.
We use some banned/controlled chemicals/materials in our processes.	Yes/ <input checked="" type="radio"/> No	Non-fulfillment of regulatory requirements. Air, land or water pollution depending on current usage. Exposure of workers or consumers to banned chemicals. Food safety.
We face problems related to pests/vectors.	<input type="radio"/> Yes/ <input checked="" type="radio"/> No	Use of chemicals. Chemical exposure to workers. Land or water contamination due to improper disposal of pesticides containers.

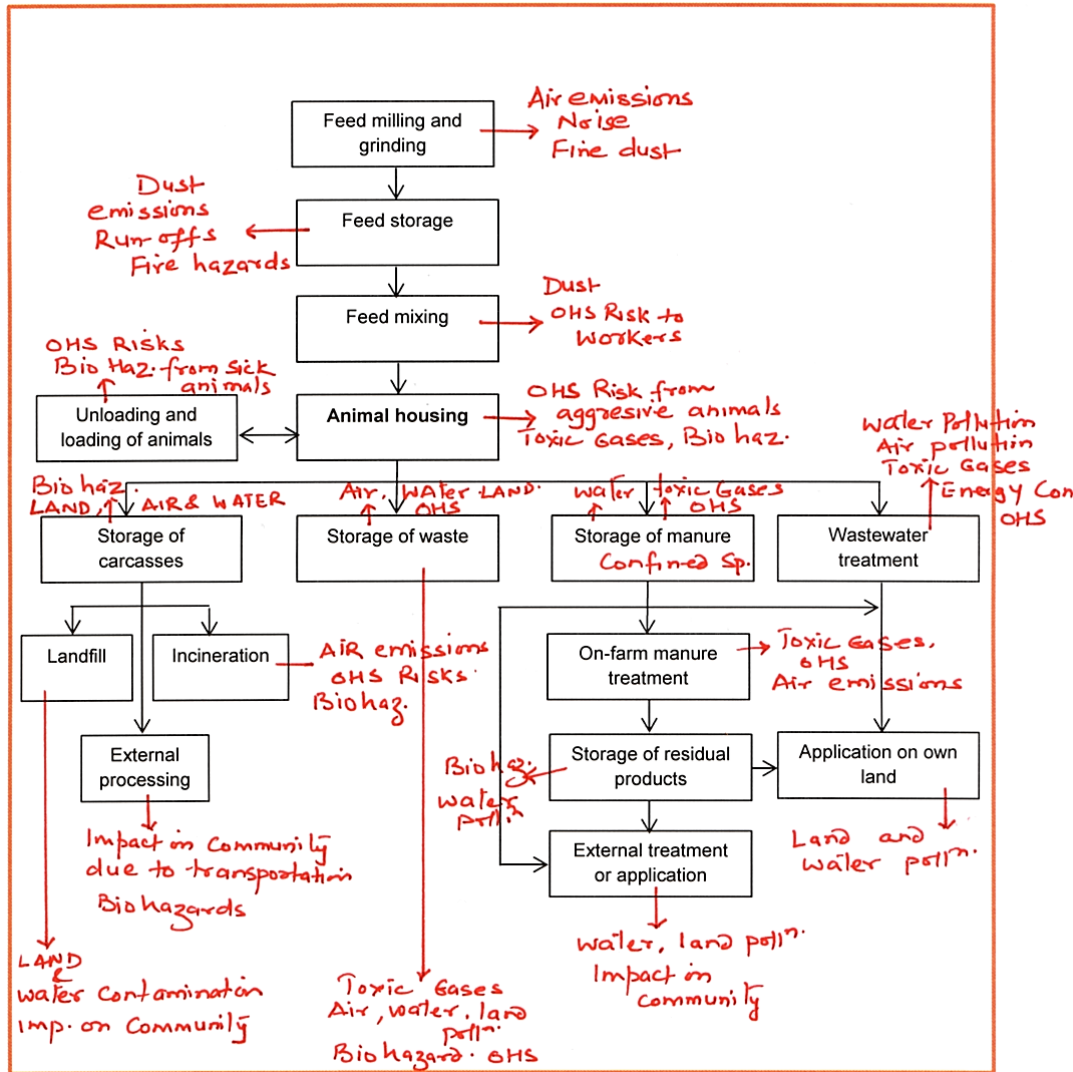
COMMUNITY HEALTH, SAFETY AND SECURITY RISKS		
RISK FACTORS	My company has the following conditions (circle the appropriate answer)	Potential negative impact (A "yes" response means that there is a potential negative impact)
Our production activities involve treatment of animals with antibiotics or other growth promotants that may result in contamination of meat, water or crops (from manure usage as fertilizer).	Yes/No	Food contamination/food safety issues.
Our production activities and treatments involve generation of solid and liquid wastes (e.g. manure, urine, etc.) that may lead to odors.	Yes/No	Exposure of community to odors, pathogens and toxic emissions (e.g. ammonia, H <sub>2</sub> S, etc.).
We use certain banned chemicals, pesticides and other hazardous substances in our operations.	Yes/No	Exposure of community to banned chemicals/hazardous substances. Water and land contamination. Impact on wildlife.
Our operations involve air emissions, water discharge, solid waste disposal, leakage of chemicals or gases, etc. (e.g. lagoons, manure collection and storage systems), that may affect the surrounding community.	Yes/No	Air, water or land contamination, which can affect the health and livelihood of local communities.
We plan to develop new infrastructure, buildings, equipment and other facilities.	Yes/No	Exposure of communities to air emissions, noise and accidents due to equipment and vehicular movement. Impact on wildlife, biodiversity and local livelihoods due to natural habitat conversion.
We plan to decommission and dispose of old infrastructure, buildings, equipment and other facilities.	Yes/No	Health risks to communities due to exposure to toxic substances (e.g. from chemicals, heavy metals, asbestos, etc.), and air emissions and noise due to equipment and vehicular movement. Impact on wildlife and biodiversity.
There is significant movement of vehicles in and around our facility due to our operations (e.g. vehicles transporting livestock, feed manufacturing and supply to farms, movement of water tankers, etc.).	Yes/No	Exposure of communities to air emissions, noise and accidents due to vehicular movement.
We store hazardous material or hazardous waste in our facility.	Yes/No	Health risks to communities and negative impacts on wildlife and biodiversity due to unintentional (spills) release of hazardous or toxic substances contaminating air, land and/or water.
We discharge water from our operations, which may have an impact on surrounding water bodies (e.g. treated wastewater, accidental discharge from lagoons, overflow from lagoons during rainy season, etc.).	Yes/No	Negative impacts on local food security and income generation due to contamination of aquatic life. Illness among local communities due to the use of contaminated water.
We hire temporary and migrant workers.	Yes/No	Communicable diseases brought or spread by the influx of workers.

<b>We hire private security personnel</b>	Yes/No	Conflicts with communities and indigenous people.
<b>Our operations have close proximity with the local community.</b>	Yes/No	Conflicts with communities and indigenous people (e.g. due to emissions and odor from our operations, sharing of local resources, etc.).

**XYZ LIVESTOCK COMPANY Physical Mapping**

A team that included supervisors and workers did a walk-through in the plant during operating hours and annotated on a sketch map all the problems they observed.

The Physical Map presented here can be used for most of the animal rearing facilities and can be referred to as well when you do your emergency preparedness plan.



## XYZ 2. Identification of Risks and Impacts

### XYZ LIVESTOCK COMPANY Risk Assessment Prioritization Form

Based on the Risk Identification Form, XYZ used the Risk Assessment Form to identify which were the highest priority risks to address through their Action Plans.

COMPANY AREA OR DEPARTMENT	RISK	PROBABILITY OF OCCURRING (low, medium, high, extreme)	SEVERITY IF OCCURRED (low, medium, high, extreme)	NOTES
<b>Animal production area</b>	Manure and urine collected in waste lagoon leading to land and water contamination.	Medium	Extreme	<ul style="list-style-type: none"> <li>Ruptures, leaks and overflows from waste lagoons can cause contamination of the Akaki river with high levels of nitrogen, phosphorus and chemical residues, drug resistant bacteria and other pathogens.</li> <li>Waste lagoon can emit toxic gases including ammonia, hydrogen sulphide and methane resulting in high air pollution and GHG emissions</li> </ul>
<b>Animal sourcing area</b>	Possibility of child labor in the supply chain	Extreme	Extreme	<ul style="list-style-type: none"> <li>According to some employees, children as young as 5-7 years are engaged in herding cattle</li> <li>Child workers are found to be exposed to hazardous working conditions</li> </ul>
<b>Animal sourcing area</b>	Possibility of human trafficking and forced/bonded labor in the supply chain	Medium	Extreme	<ul style="list-style-type: none"> <li>According to some employees, instances of child trafficking or bonded labor due to parents' debt may be found in supply chain</li> </ul>
<b>Animal production area</b>	Workers' injuries from being kicked, gored or stomped by cattle	High	Extreme	<ul style="list-style-type: none"> <li>Overcrowding of animals, poor conditions, sudden movements from workers may result in sudden and aggressive response from the animals leading to</li> </ul>



				sever physical injuries
<b>Feed area</b>	Use of Specified Risk Material (SRM) in the cattle feed	Medium	Extreme	<ul style="list-style-type: none"> <li>• Ongoing concern raised by the food safety auditor of one of the XYZ's customers.</li> <li>• Lack of system for monitoring the quality of rendered feed was highlighted by the food safety auditor.</li> </ul>

### **XYZ LIVESTOCK COMPANY Action Plan**

Based on its Risk Assessment Form, XYZ prioritized the following four key risks:

- Manure and urine collected in waste lagoon leading to contamination of the Akaki river and emissions of toxic and GHG gases
- Possibility of child and forced labor in the supply chain
- Workers' injuries from being kicked, gored or stomped by cattle
- Use of Specified Risk Material (SRM) in the cattle feed

XYZ developed Action Plans to manage these four (4) risks (see below).

## XYZ | 3. Management Programs

### Risk 1:

Manure and urine collected in waste lagoon leading to contamination of the Akaki river and emissions of toxic and GHG gases

MITIGATION HIERARCHY	ACTION	OBJECTIVE AND TARGET	DEADLINE	RESPONSIBLE STAFF	RESOURCES REQUIRED	OPERATIONAL PROCEDURES
Avoid	<ul style="list-style-type: none"> <li>- Stop sending manure to waste lagoon</li> <li>- Harvest remaining sludge for fertilizer</li> <li>- Maintain good drainage on the farm and restrict contaminated storm water from entering the natural drainage system and sending it to waste lagoon</li> </ul>	<p>Objective: Use waste lagoon only for the collection of contaminated storm water</p> <p>Target: 100% contaminated storm water sent to waste lagoon</p>	3 months	<p>Staff time intensity: Low</p> <p>Capital intensity: Low</p>	<p>Staff time intensity: Low</p> <p>Capital intensity: Low</p>	
Minimize	<ul style="list-style-type: none"> <li>- Keep waste dry by scraping manure instead of flushing with water to remove waste.</li> <li>- Collect dry waste and send to a central location for composting</li> </ul>	<p>Objective: Compost manure</p> <p>Target: 100% of manure composted</p>	3 months	<p>Staff time intensity: Medium</p> <p>Capital intensity: High (tractor, low bed trailer, compost turner)</p>	<p>Staff time intensity: Medium</p> <p>Capital intensity: High (tractor, low bed trailer, compost turner)</p>	- Procedures for waste management
Compensate /Offset	<ul style="list-style-type: none"> <li>- Provide financial assistance to affected community members for proper medical diagnosis and treatment if needed</li> </ul>	<p>Objective: Redress grievances related to exposure to toxic gases and water contamination from waste lagoon</p> <p>Target: 100% grievance redressal in timely manner</p>	Immediate	<p>Staff time intensity: Medium</p> <p>Capital intensity: High</p>	<p>Staff time intensity: Medium</p> <p>Capital intensity: High</p>	- Community engagement and grievance redressal procedure

## XYZ | 3. Management Programs

### Risk 2:

Possibility of child and forced labor in the supply chain

MITIGATION HIERARCHY	ACTION	OBJECTIVE AND TARGET	DEADLINE	RESPONSIBLE STAFF	RESOURCES REQUIRED	OPERATIONAL PROCEDURE
Avoid	<ul style="list-style-type: none"> <li>- Engage with social NGOs to understand the extent and impacts of child and forced labor in XYZ supply areas</li> <li>- Train purchasing agents to assess child and forced labor risks among suppliers (pastoralists and traders)</li> <li>- Communicate XYZ's policies and procedures on child and forced labor to suppliers; high risk suppliers for child labor and forced labor will be eliminated</li> </ul>	<p>Objective: Identify likelihood of child labor in livestock supply chain</p> <p>Target 1: 100% of suppliers evaluated</p> <p>Target 2: 100% elimination of suppliers classified as high risk for child labor and forced labor</p>	6 months	- Animal sourcing supervisor	<p>Staff time intensity: Medium</p> <p>Capital intensity: Low</p>	- Procedure to assess and register the risk of child labor in supplier evaluation records

## XYZ | 3. Management Programs

### Risk 3:

Workers' injuries from being kicked, gored or stomped by cattle

MITIGATION HIERARCHY	ACTION	OBJECTIVE AND TARGET	DEADLINE	RESPONSIBLE STAFF	RESOURCES REQUIRED	OPERATIONAL PROCEDURE
Avoid	<ul style="list-style-type: none"> <li>- Install man gates (small passages) and other safe means for quick and easy escape from unexpected dangerous situations</li> <li>- Install restraining equipment and facilities to restrain animal during movement; treatment and medical examination (e.g. cattle crates/crashes; cattle race; rope halter; cattle headgates; squeeze chutes; loading chutes; appropriately designed corral systems; etc.)</li> </ul>	<p>Objective: Prevent injuries to workers from handling animals</p> <p>Target: 100% reduction</p>	6 months	<ul style="list-style-type: none"> <li>- Animal production supervisor</li> <li>- Maintenance supervisor</li> </ul>	<p>Staff time intensity: High</p> <p>Capital intensity: Medium</p>	
	<ul style="list-style-type: none"> <li>- Periodically train all new and existing supervisors and workers, including contractors and subcontractors, on procedures for safe handling of large animals, warning signs, mandatory protective equipment, and means of escape from dangerous situations.</li> </ul>		3 month	<ul style="list-style-type: none"> <li>- Animal production supervisor</li> <li>- HR manager</li> </ul>	<p>Staff time intensity: High</p> <p>Capital Intensity: Low</p>	- Procedures for safe animal handling
Minimize	<ul style="list-style-type: none"> <li>- Provide job and hazard specific personal protection to employees handling farm animals (e.g. steel toed boots, head protection, safety glasses, latex rubber or nitrile gloves)</li> <li>- Provide neoprene or nitrile gloves, respirators, safety glasses and long sleeve clothing to veterinary personnel</li> <li>Identify and remove consistently aggressive and dangerous animals from farm on a regular basis</li> </ul>		1 month	<ul style="list-style-type: none"> <li>- Animal production supervisor</li> </ul>	<p>Staff time intensity: Low</p> <p>Capital intensity: Medium</p>	
Compensate / Offset	<ul style="list-style-type: none"> <li>- Provide medical care and timely assistance for workers who are injured in the workplace</li> <li>- Compensate workers for lost wages, loss ability to work, and loss of life, in line with local labor regulations and company's policies</li> </ul>	<p>Objective: Compensation, treatment and rehabilitation of affected employees.</p> <p>Target: Treatment</p>	Immediate on demand	<ul style="list-style-type: none"> <li>- HR manager</li> </ul>	<p>Staff time intensity: Low</p> <p>Capital intensity: High</p>	- Emergency management procedures

## XYZ | 3. Management Programs

		and rehabilitation of 100% affected employees				
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### Risk 4:

Use of Specified Risk Material (SRM) in the cattle feed

MITIGATION HIERARCHY	ACTION	OBJECTIVE AND TARGET	DEADLINE	RESPONSIBLE STAFF	RESOURCES REQUIRED	OPERATIONAL PROCEDURES
Avoid	<ul style="list-style-type: none"> <li>- Request feed suppliers for third party SRM certification</li> <li>- Maintain a record of feed suppliers and track feed material from suppliers to animal feeding</li> </ul>	<p>Objective: No use of feed containing SRM</p> <p>Target: 100% elimination of feed containing SRM</p>	3 month	- Feed supervisor	<ul style="list-style-type: none"> <li>- Staff time intensity: Medium</li> <li>- Capital intensity: Low</li> </ul>	<ul style="list-style-type: none"> <li>- Procedure for selection, evaluation and monitoring of feed suppliers</li> <li>- Procedure for feed traceability</li> </ul>
Compensate/ Offset	- Recall products from the market that originated from animals that have been identified at a risk of having been fed with feed containing SRM	<p>Objective: Recall all products at risk of SRM</p> <p>Target: 100%</p>	Immediate	- Sales manager	<ul style="list-style-type: none"> <li>- Staff time intensity: Low</li> <li>- Capital intensity: TBD</li> </ul>	- Procedure for recalling contaminated products

Based on the identification of water contamination and air emissions from poor waste handling practices as a key issue to be addressed (see Risk 1), XYZ adopted and put in place the waste management procedure below as part of its Action Plan.

**XYZ LIVESTOCK COMPANY Farm Waste Management Flowchart**

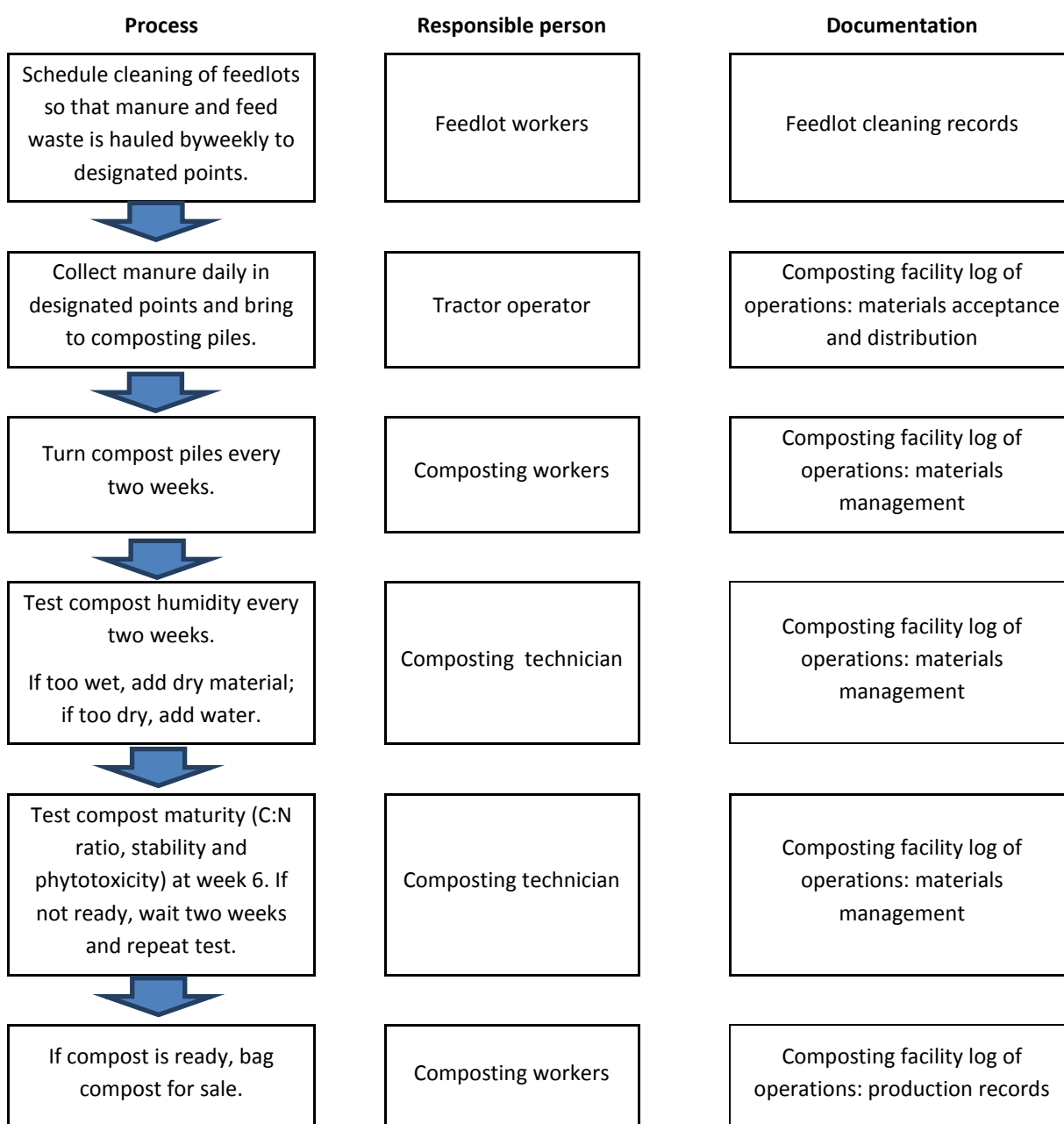
**Title:** Farm Waste Management Procedure

**Date issued:** February 15, 2012

**Date revised:** March 1, 2013

**Approving authority:** Operations manager, Environmental manager

**Purpose:** Implement a waste management procedure to reduce risks of contamination of nearby water bodies and emission of toxic and GHG gases.



## XYZ 4. Organizational Capacity and Competency

XYZ developed a simple training plan to raise awareness on the ESMS and provide employees with the skills needed to implement the Action Plans and related procedures. XYZ was able to participate in a local government program that provided subsidized training in these areas.

### XYZ LIVESTOCK COMPANY Training Plan

DEPARTMENT/AREA	MODULE 1	MODULE 2	MODULE 3	MODULE 4
<b>ESMS team</b>	Introduction to ESMS	Complaint management and resolution procedure	Applicable Environment, OHS and Labor regulations	ESMS in the supply chain
<b>All workers and supervisors</b>	Occupational health and safety	Emergency response procedures Biosecurity protocols Handling of epizootics outbreaks	Complaints procedure	Worker-manager communications
<b>Senior management</b>	Introduction to ESMS	Labor standards performance issues Environmental performance issues	Food safety Biosecurity	Stakeholder and community engagement and communications
<b>Animal production</b>	Introduction to ESMS	Waste management procedures	Animal handling procedures	Emergency response procedures Biosecurity protocols Handling of epizootics outbreaks
<b>Animal sourcing</b>	Introduction to ESMS	Child labor risks in cattle supply chain	Animal health and quality requirements	
<b>Feed sourcing</b>	Introduction to ESMS	Feed quality requirements	SRM risks among feed suppliers	



## XYZ 4. Organizational Capacity and Competency

XYZ developed a Roadmap to estimate the staff time required and the timeframe to develop and implement their ESMS. They estimated a total of 167.25 days of time from senior management, middle management, supervisors and workers.

### Roadmap and Estimated Timeframe for Developing and Implementing XYZ FOOD COMPANY'S ESMS

ACTIVITY		TIME SPENT				MONTH																							
						1		2		3		4		5		6													
1. Policy		Senior mgt time	Mid-mgt time	Supervisors time	Workers time																								
Developing	Kick-off meeting at senior management level to discuss ESMS implementation	.5				■																							
	Selection (including communication/coordination) of ESMS core team (personnel from different key departments)	.25	.5	1		■																							
	Appreciation/awareness workshop for senior management and core team on ESMS requirements	2	4	6		■																							
	Review/upgrading of existing environment and social policy. Or formulation of organization's environmental and social policy	.5	1	1		■																							
Implementing	Design, printing and display of ESMS policy in key areas		.5	.5		■																							
	Uploading of ESMS policy on company website		.25	.5		■																							
	Communication of ESMS policy to key external stakeholders	.5				■																							
	Training and awareness-raising of employees on ESMS policy and information dissemination		.5	1	4	■																							

## XYZ 4. Organizational Capacity and Competency

2. Risk and Impact Identification		Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTHS													
						1		2		3		4		5		6			
Developing	Mapping of activities, processes and key stakeholders, including the suppliers and contractors	.5	.5	1.5															
	Identification and compilation of regulatory and other requirements, including stakeholder expectations	.5	2	1															
	Initial environment and social review, identification and evaluation of environment and labor risks (including supply chain)	2	6	8	4														
Implementing	Training and awareness of employees on environmental, social and labor risks and risks identification process		1	2	3														
	Training and awareness of employees on regulatory and other requirements, including stakeholder expectations	.5	2	4	4														
	Training and awareness-raising of employees on environment, social and labor risks and information dissemination		.5	1	2														

3. Management Programs		Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTHS																									
						1		2		3		4		5		6															
Developing	Preparation of ESMS manual (formulation and documentation of procedures related to ESMS)	.5	5	2		■																									
	Formulation, compilation of environmental objectives/targets and social performance improvement measures	.25	.5	2	4																										
	Formulation and development of environment and social action plans	1	4	2	4																										
	Development of operational procedures	1	6	6	8																										
Implementing	Communication, awareness-raising and training of employees on ESMS procedures	.5	2	2																											
	Communication and awareness of employees on environmental objectives and social performance improvement measures		.5	2																											
	Communication and awareness of employees on environmental and social action plans		.5	2																											
	Training of employees on environmental and social operational procedures		2	4	10																										

# XYZ 4. Organizational Capacity and Competency

4. Organizational Capacity and Competency		Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTHS																								
						1				2				3				4				5				6				
Developing	Environmental and social awareness program for middle management		2			█																								
	Environmental and social awareness program for workers		1	2	8			█																						
	Competency program for ESMS core team		2	2		█																								
	Internal auditor training for the organization's ESMS assessors/auditors		2	2																										
Implementing	General awareness-raising and training on environment, social and labor issues/ESMS for senior and middle management	1	2					█																						
	Environmental and social awareness program for workers		1	2	5			█																						
	Competency program for ESMS core team		2	2		█																								
	Internal auditor training for the organization's ESMS assessors/auditors		2	2																										

5. Emergency Preparedness and Response		Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTHS																							
						1				2				3				4				5				6			
Developing	Review key risks and existing emergency preparedness plan		1																										
	Upgrade/prepare the emergency preparedness plan		2	1																									
	Communicate to workers, potentially affected communities and relevant government agencies (if required)	.25	1																										
Implementing	Raise awareness and communication to employees and affected communities on key risks and emergency issues and emergency planning		.5	.25	2																								
	Training of employees on emergency preparedness plan		1	2	6																								
	Communication and awareness-raising on emergency procedures to affected communities and relevant authorities (if required)	.25	1																										

6. Stakeholder Engagement		Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTHS																							
						1				2				3				4				5				6			
Developing	Mapping of all stakeholders, stakeholder analysis and engagement planning	.25	1																										
	Develop/upgrade stakeholder communication/consultation; information disclosure and engagement strategy/program	.25	2																										
Implementing	Communication to employees on key stakeholders and their environment and social/labor expectations		.25		2																								
	Communication, awareness-raising and training of employees on the strategy/program for stakeholder engagement/consultation/communication and information disclosure		.5	1	2																								

## XYZ 4. Organizational Capacity and Competency

7. External Communication and Grievance Mechanism		Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTHS																							
						1				2				3				4				5				6			
Developing	Review external communication system, including receiving and handling feedback, concerns and complaints		.5							■																			
	Develop/upgrade system for regular engagement, receiving, documenting and responding to feedback and grievances	.25	1							■																			
Implementing	Review external communication, feedback, stakeholder concerns and complaints and communicate to key personnel	.25	1	.5	2					■																			
	Training, awareness-raising and implementation of stakeholder engagement, receiving, documenting and responding to feedback and grievances		1	.5	2									■															

8. Ongoing Reporting to Affected Communities		Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTHS																							
						1				2				3				4				5				6			
Developing	Review existing system for reporting and disclosure		.25							■																			
	Develop/upgrade system for external reporting and disclosure (including collection, validation and verification of information)	.25	1	.5						■																			
Implementing	Communication and disclosure to key external stakeholders and affected communities	.25	.25							■												■							
	Communication, awareness-raising and training on external reporting and disclosure (including collection, validation and verification of information)		1	1	2									■															

## XYZ 4. Organizational Capacity and Competency

	9. Monitoring and Review	Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTHS																							
						1				2				3				4				5				6			
Developing	Establish procedure to monitor and measure ESMS performance, compliance and stakeholder requirements	.25	1	.25																									
	Implementation of ESMS monitoring program, establishing benchmarks and integration with existing system	.5	1	1																									
	Final review and complete ESMS documentation	.5	1																										
	Conduct internal audit/evaluation of ESMS performance against the management program requirement/benchmarks		1	1	.5																								
	Establish relevant operational controls and formulation of corrective and preventive actions	.25	1	.5	.5																								
	Review by the senior management to assess performance and effectiveness of ESMS	.25	.25	.25																									
Implementing	Documentation and communication on ESMS conformance, regulatory compliance and stakeholder requirements		1	1																									
	Communication, awareness, training and implementation of ESMS monitoring program and established benchmarks	.25	1	1	3																								
	Communication of internal audit/performance measurement findings and ESMS performance to the employees		.5	.25	1																								
	Communication, awareness and training of employees on operational controls and corrective and preventive actions		.5	1	3																								
	Communication on outcomes of review of the ESMS performance by senior management and key decisions taken	.25																											
	<b>TOTAL</b>	22.75	53.5	42	49																								

## XYZ | 5. Emergency Preparedness and Response

XYZ developed a Preparedness and Response Plan to identify, prevent and respond to fire emergencies. The plan includes a Fire Preparedness and Response Procedure. Farm fires pose a specific kind of threat since farms tend to be isolated and have limited access to well-equipped urban fire departments or to large quantities of water. Barns are highly flammable and can quickly burn out of control. No amount of precaution will entirely eliminate fire hazards, so it is important to be prepared to deal with the fire emergency at farms.

### **XYZ LIVESTOCK COMPANY Fire Response Procedure**

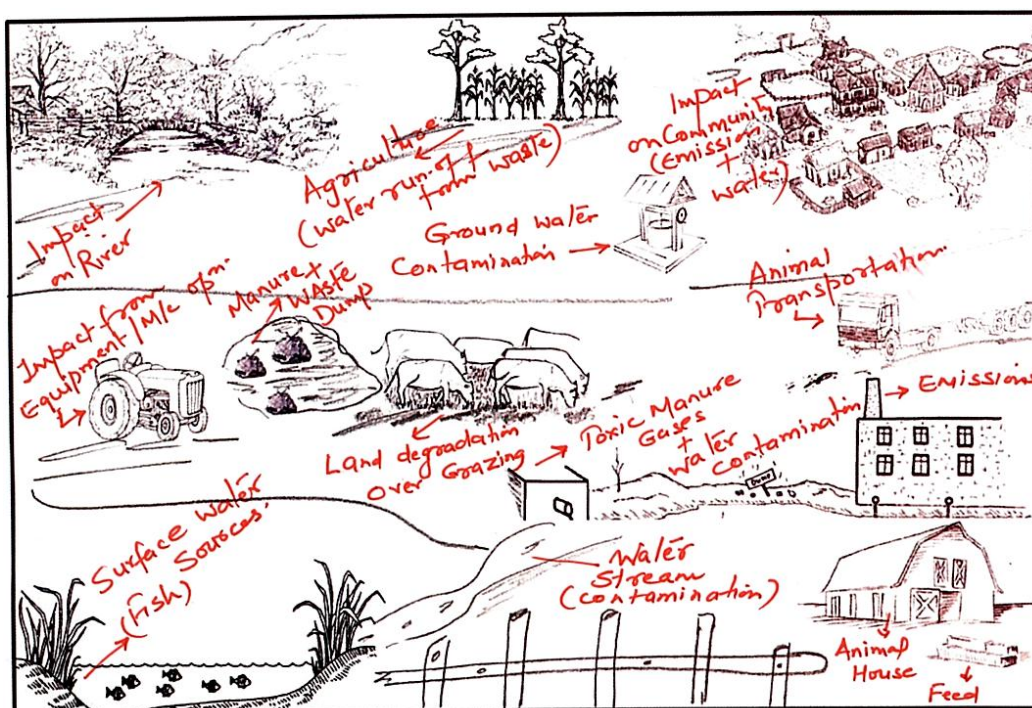
See sample Fire Preparedness and Response Procedure in Section I of this Toolkit.



### XYZ LIVESTOCK COMPANY Stakeholder Mapping – Identification and Analysis

An XYZ cross-departmental team brainstormed and **listed the stakeholders** that are **affected by or have an interest in** the company’s operations. The team then discussed and **listed their key concerns, issues and interests**. To identify those, they looked back at the environmental and social key risks and impacts previously identified (see Chapter 2. *Identification of Risks and Impacts – XYZ Case Study*) and how these affect the surrounding communities.

To identify nearby villages and groups that may be affected by the company operations, the company also used a satellite image and drew a sketch with the sources of pollution and the areas that could be affected (see Impact Zoning Tool for Identifying Affected Communities in Section I of this Toolkit).

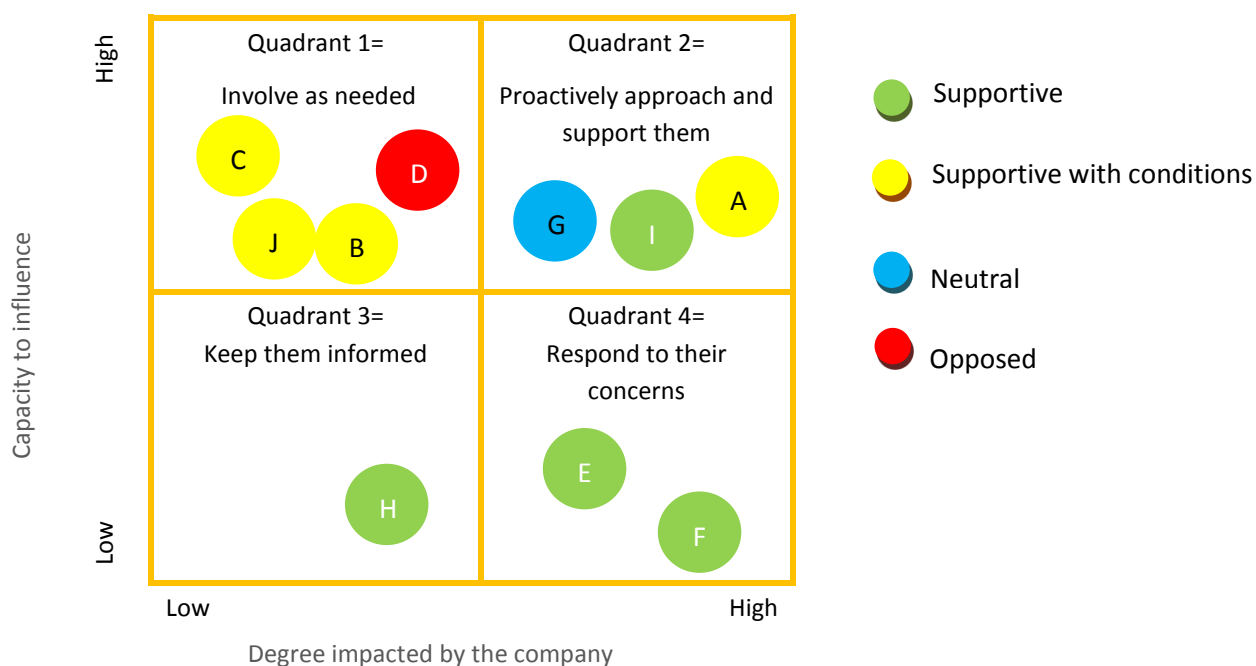


## XYZ 6. Stakeholder Engagement

STAKEHOLDER	ISSUES/CONCERNS/INTERESTS
a. Local village population (affected community)	Contamination of Akaki river; impact on ambient air quality including odors, flies and other vectors due to poor waste management practices
b. Environmental Protection Agency (regulator)	Regulatory compliance; contamination of Akaki river
c. Ethiopian Standards Agency	Food safety; product quality
d. Social NGOs	Child labor and forced labor in XYZ supply chain
e. XYZ's workers	Working conditions; occupational health and safety conditions; availability of adequate PPEs
f. Contract workers	Working conditions; occupational health and safety conditions; availability of adequate PPEs
g. Customers	Food safety (risk of use of SRM); product quality; brand reputation
h. Feed suppliers	Feed quality requirements; profitability
i. Animal suppliers	Profitability, animal health and quality requirements, child labor
j. Local labor authorities	Compliance with labor regulations

Then, XYZ **mapped the stakeholders** on a matrix according to the degree to which they are impacted and their ability to influence the company operations. Finally, XYZ **categorized** them based on their current relationship with the company: supportive, supportive with conditions, neutral, opposed. Based on this, they define their **engagement method** with each group.

5.



XYZ FOOD COMPANY Stakeholder Engagement Plan

Based on the information above XYZ prepared a Stakeholder Engagement plan.

STAKEHOLDER ENGAGEMENT PLAN				
Stakeholder	Concerns	Engagement method	Information to disclose and report back	Most valuable info to obtain
a. Local village population (affected community) (Quadrant-2)	Contamination of Akaki river; impact on ambient air quality including odors, flies and other vectors due to poor waste management practices	<ul style="list-style-type: none"> <li>- <b>Grievance mechanism</b></li> <li>- Quarterly <b>town hall meetings</b> with members of the local community</li> </ul>	<ul style="list-style-type: none"> <li>- Progress on solid waste management program to prevent water contamination (composting)</li> <li>- Results of surface and groundwater quality monitoring</li> </ul>	<ul style="list-style-type: none"> <li>- Identification of sources of pollution</li> </ul>
b. Customers (Quadrant-2)	Food safety (risk of use of SRM); product quality; brand reputation	<ul style="list-style-type: none"> <li>- <b>Grievance mechanism</b> through telephone hotline</li> <li>- Well-briefed communications team to address consumer concerns</li> </ul>	<ul style="list-style-type: none"> <li>- Progress on actions and procedures related to food safety</li> </ul>	<ul style="list-style-type: none"> <li>- Own performance on food safety</li> <li>- Performance benchmarks in local and international market</li> </ul>
c. Animal suppliers: pastoralists and traders (Quadrant-2)	Profitability, animal health and quality requirements, child labor	<ul style="list-style-type: none"> <li>- <b>Well-briefed purchasing agents</b> team to address suppliers concerns</li> </ul>	<ul style="list-style-type: none"> <li>- Quality requirements</li> <li>- Quality concerns/complaints related to supplied animals</li> <li>- Company labor standards regarding use of child labor</li> </ul>	<ul style="list-style-type: none"> <li>- Extent of reliance on child labor</li> <li>- Cost structure</li> </ul>
d. ABC's workers (Quadrant-4)	Working conditions; occupational health and safety conditions; availability of adequate PPEs	<ul style="list-style-type: none"> <li>- <b>Monthly meetings</b> of workers with Production Department Head</li> <li>- Regular updates through quarterly <b>notice boards</b></li> </ul>	<ul style="list-style-type: none"> <li>- Progress on Action Plan to address workers' injuries from cattle</li> <li>- Status of EHS objectives and targets</li> <li>- Complaint management and resolution procedure</li> <li>- Filled complaints and resolutions</li> </ul>	<ul style="list-style-type: none"> <li>- Employees concerns/ expectations and complaints</li> </ul>
e. Contract workers (Quadrant-4)	Working conditions; occupational health and safety conditions; availability of adequate PPEs	<ul style="list-style-type: none"> <li>- <b>Monthly meetings</b> of workers with Production Department Head</li> <li>- Regular updates through quarterly <b>notice boards</b></li> </ul>	<ul style="list-style-type: none"> <li>- Progress on Action Plan to address workers' injuries from cattle</li> <li>- Status of EHS objectives and targets</li> <li>- Complaint management and resolution procedure for</li> </ul>	<ul style="list-style-type: none"> <li>- Contract workers' concerns/expectations and complaints</li> </ul>

## XYZ 6. Stakeholder Engagement

			contract workers - Filled complaints and resolutions	
f. Environmental Protection Agency (regulator) (Quadrant-1)	Regulatory compliance; impact on local water resources	- <b>Submission</b> of annual environmental monitoring report  - Periodic <b>phone calls/e-mail</b> communications as required	- Progress on company's environmental programs  - Results of environmental monitoring  - Number/instances of noncompliance and measures taken  - Details of ongoing and redressed environmental grievances	- Information on current and proposed regulations  - Fines and penalties related to environmental noncompliance  - Available pollution control technologies
g. Ethiopian Standards Agency (Quadrant-1)	Food safety; product quality	- Periodic <b>phone calls/e-mail</b> communications as required		- Quality standards
h. Social NGOs (Name 1, Name 2) (Quadrant-1)	Child labor and forced labor in XYZ supply chain	- Regular <b>email</b> communication and <b>meetings</b> with local representatives	- Procedures to assess and register the risk of child labor in supplier evaluation records	- Extent and impacts of child labor of XYZ supply areas
i. Local labor authorities (Quadrant 1)	XYZ compliance with international (ILO Conventions) and national labor regulations	- Contact with labor inspectors during periodic and <b>unannounced visits</b> to XYZ	- XYZ progress on Action Plans to improve labor standards internally and in its supply chain	- Knowledge of labor standards
j. Feed suppliers (Quadrant-3)	Feed quality requirements; profitability	- Periodic <b>e-mail/phone</b> communication	- Quality requirements related to feed material  - Quality concerns/complaints related to feed supply	- Regulatory requirements on feed material  - Database of banned and restricted material, SRM

XYZ has implemented a grievance mechanism. The procedure is explained during the quarterly meetings with local villagers and is also announced on a poster outside the company's gate.

### XYZ LIVESTOCK COMPANY Grievance Mechanism Poster

#### XYZ LIVESTOCK COMPANY

*We're proud to be part of your community. If you have any questions, concerns or complaints, here's how to reach us, and how we'll respond.*



- You can send an email to XYZ's administrative officer at [Community@XYZ.com](mailto:Community@XYZ.com).

*Time for acknowledgment of receipt: 48 hours*



- You can call XYZ's administrative officer, Monday to Friday, from 3pm to 5 pm, at 123-45-6789.

*Time for acknowledgment of receipt: immediate or 48 hours if left a message.*



- You can fill out a form and submit it to the suggestion box at the company's gate. The suggestion box is more confidential. It will only be opened by XYZ's administrative officer.

*Time for acknowledgment of receipt: 1 week.*

*At the time of the acknowledgment of receipt, XYZ will provide an estimated date for response and request further information if needed.*

*If the issue is not resolved by the estimated date, XYZ's administrative officer will provide an update of the situation to the interested party.*

*Every three months at the XYZ town hall meeting, XYZ's general manager will present the list of questions and complaints received, their status and the actions taken by the company to address the issues.*

### XYZ Grievance Mechanism Procedure



## XYZ | 7. External Communication and Grievance Mechanism

### XYZ LIVESTOCK COMPANY Key Aspects of Grievance Mechanism

KEY ASPECTS OF EFFECTIVE GRIEVANCE MECHANISMS	XYZ'S METHOD
<b>Provide ease of access to confidentially communicate or file complaints, including anonymous ones</b>	XYZ has an email address, a telephone hotline, and a suggestion box specifically for complaints. Email is checked daily and suggestion box is checked biweekly by the administrative office.
<b>Publicize the system so that stakeholders know it exists and how to access it</b>	XYZ has a written procedure that the general manager explains during quarterly town hall meetings. The procedure is posted on a banner outside the company's gate. The poster is in English and the local language.
<b>Foster sense of legitimacy and trust; encourage dialogue and shared responsibility for outcomes</b>	XYZ works with the local government ministries to ensure that legal mechanisms are followed and consults with various groups to refine its system as needed.
<b>Be transparent about the process and outcomes</b>	The administrative office receives and records complaints and reports back to the complainant about whether the complaint is accepted or not, provide information about the process and timeline for investigation and resolution.
<b>Implement a predictable and defined process that includes assignment of responsibility, time limits and monitoring of outcomes</b>	The administrative office receives and records the complaint and then works with relevant staff and external stakeholders to investigate, determine actions and report back outcomes.
<b>Make the system a source of continual learning</b>	XYZ's general manager and department heads meet quarterly to review complaints and check for ways to improve the mechanism and the overall company systems.

XYZ regularly reports to affected local villagers on the progress on its commitments to resolve the issues identified when communicating with them through its stakeholder engagement process and through its grievance mechanism. Reports are presented in the local language and in a clear format during quarterly town hall meetings so that everybody can understand.



## XYZ LIVESTOCK COMPANY Monitoring Plan

XYZ's ESMS Team developed a Monitoring Plan based on the Action Plans and their targeted objectives (see Chapter 3. Management Programs – XYZ Case Study).

### Risk 1: Manure and urine collected in waste lagoon leading to contamination of the Akaki river and emissions of toxic and GHG gases

Objective: Use waste lagoon only for the collection of contaminated storm water

Target 1: 100% contaminated storm water sent to waste lagoon

PERFORMANCE INDICATORS		
Monitoring indicators	Monitoring records	Equipment
Surface water quality of nearby water sources and ground water quality at the selected open wells/bore-wells (BOD <sub>5</sub> , COD, pH, nitrates, pathogens, heavy metals, etc.)	- Water analysis records	- Outsourced to external laboratory

PROCESS INDICATORS	
Monitoring indicators	Monitoring records
Contaminated storm water runoff collected in waste lagoon	- Inspection of drainage system - Environment audit report
Financial budgets allocated to operation & maintenance of waste lagoons	- Management meeting records

Objective: Compost all manure generated at the farm

Target: 100% of manure composted

PERFORMANCE INDICATORS		
Monitoring indicators	Monitoring records	Equipment
Volume of compost spread in XYZ farmland	- Composting log	
Volume of compost sold	- Compost sales log	

PROCESS INDICATORS	
Monitoring indicators	Monitoring records
Percentage of workers trained and retrained in waste management procedures	- Training records

## XYZ | 9. Monitoring and Review

Objective: Redress grievances related to exposure to toxic gases and water contamination from waste lagoon

Target: 100% grievance redressal in timely manner

PERFORMANCE INDICATORS		
Monitoring indicators	Monitoring records	
Number of complaints and concerns received related to waste management	- Complaints/concerns log - Stakeholder engagement records	
Financial compensation/assistance provided to affected community	Budget and expenditure records	

PROCESS INDICATORS	
Monitoring indicators	Monitoring records
Number and frequency of engagements with affected community	- Stakeholder engagement reports

### Risk 2: Possibility of child and forced labor in the supply chain

Objective: Identify likelihood of child labor in livestock supply chain

Target 1: 100% of suppliers evaluated

Target 2: 100% elimination of suppliers classified as high risk for worst forms of child labor and forced labor

PERFORMANCE INDICATORS		
Monitoring indicators	Monitoring records	Equipment
Number and percentage of suppliers classified as extreme, high, medium and low regarding risks of child labor and forced labor	- Animal supplier evaluation records	Number and percentage of suppliers classified as extreme, high, medium and low regarding risks of child labor and forced labor
Number and percentage of suppliers classified as high risk that have been eliminated	- Current approved supplier list	Number and percentage of suppliers classified as high risk that have been eliminated

PROCESS INDICATORS	
Monitoring indicators	Monitoring records
Number and percentage of purchasing agents trained on identification of risks of worst forms of child labor and related XYZ's policy	- Training records
Frequency of periodic monitoring of existing suppliers for conformance with XYZ's labor policies and contract conditions	- Supplier monitoring and audit reports

## XYZ | 9. Monitoring and Review

### Risk 3: Workers' injuries because of being kicked, gored or stomped by cattle

Objective: Prevent injuries to workers from handling animals

Target: 100% reduction

PERFORMANCE INDICATORS	
Monitoring indicators	Monitoring records
Number of workers responsible for animal handling	- HR records
Man-hours worked	- HR records
Number of OHS incidents including fatalities, injuries and near misses	- OHS incidents records - Medical records
Non-fatal injuries <sup>1</sup>	
Lost workdays <sup>2</sup>	

PROCESS INDICATORS	
Monitoring indicators	Monitoring records
Animal density in sheds/buildings	- Production records
Frequency of OHS risk assessment, review and updating	- Job hazards analysis records
Frequency of inspection and maintenance of animal restraint facilities, man gate, and other means of escape	- Safety audit report and record of corrective actions
Number and percentage of workers and supervisors trained on safe animal handling	- Training records
Number and percentage of workers and supervisors trained on use and maintenance of PPE	- Training records

### Risk 4: Use of Specified Risk Material (SRM) in the cattle feed

Objective: Prevent use of feed containing SRM

Target: 100% elimination of feed containing SRM

PERFORMANCE INDICATORS	
Monitoring indicators	Monitoring records
Number and percentage of feed suppliers holding SRM certification	- Feed suppliers selection and evaluation records
Number and frequency of inspections carried out on feed production and/or suppliers facilities	- Supplier inspection reports
Amount/quantity of non-conforming feed material received/rejected	- Material inspection reports

<sup>1</sup> Incapacity to work for at least one full workday beyond the day on which the accident or illness occurred.

<sup>2</sup> Lost workdays are the number of workdays (consecutive or not) beyond the date of injury or onset of illness that the employee was away from work or limited to restricted work activity because of an occupational injury or illness.

PROCESS INDICATORS	
Monitoring indicators	Monitoring records
Feed traceability system in place	- Monitoring and inspection reports
Frequency of training and retraining provided to procurement and quality department	- Training reports/records