

Environmental and Social Review Summary

Silverlands Vineyards Limited

This Environmental and Social Review Summary (ESRS) is prepared by MIGA staff and disclosed prior to the date on which MIGA's Board of Directors considers the proposed issuance of a Contract of Guarantee. Its purpose is to enhance the transparency of MIGA's activities. This document should not be construed as presuming the outcome of the decision by MIGA's Board of Directors. Board dates are estimates only.

Any documentation that is attached to this ESRS has been prepared by the project sponsor, and authorization has been given for public release. MIGA has reviewed the attached documentation as provided by the applicant, and considers it of adequate quality to be released to the public, but does not endorse the content.

Country:	Namibia
Sector:	Agribusiness
Project Enterprise:	Silverlands Vineyards Limited
Environmental Category:	Category B
Date ESRS Disclosed:	August 31, 2016
Status:	Due Diligence

A. Project Description

MIGA has been asked to provide reinsurance to the Overseas Private Investment Corporation (OPIC) through a Master Reinsurance Contract (MRC) in support of agricultural investments made by SilverStreet Private Equity Strategies SICAR – Silverlands Fund (the Fund) in up to thirteen countries in Sub-Saharan Africa. One of the investments under this MRC is the development of three table grapes farms. The Fund has invested up to US\$36.5 million in Silverlands Vineyards Limited (SVL), a new company established in April 2015, to acquire, develop and manage 198 hectares (ha) of existing table grape vineyards at Riverside (formerly Nivex) and Lakeside (formerly Nagrapex) farms and up to an additional 177 ha of development land at Hillside (formerly Golf) farm, which together comprise the SVL Project. The table grapes are designated for the export market. The existing vineyards include equipment and infrastructure, management housing, good access and connection to the national electricity grid (as well as supported by a small solar power project dedicated to SVL), while the development land comes with adequate water rights to expand the total area of vineyards to approximately 375 ha over time.

The SVL Project is located in Aussenkehr, Namibia, on the Orange River along the Namibian-South African border, approximately 645 km to the South East of Windhoek, and 620 km North West of Cape Town. The region is a hot, dry climate. All water for irrigation is obtained from the Orange River, and currently, annual volume requirements are 6.8 million m³. SVL currently has water rights to 7.7 million m³. The River is an international waterway, though there are no other countries downstream from Aussenkehr, as it flows west to the Atlantic Ocean.

Specific activities of the Project include, improvements to on-site management housing, and addressing how to improve off-site worker housing. Since the acquisition, the safety of workers

being transported to and from the farms has been improved through the procurement and use of buses.

SVL is owned by the Fund, through its subsidiary Silverlands Namibia Holdings Limited. SVL will be the fourth investment reinsured under the Master Reinsurance Contract: see [Silverlands Tanzania Limited](#), [Silverlands Ranching Limited](#), and [Silverlands Zambia Limited](#) for additional information.

B. Environmental and Social Categorization

The Project is a Category B under MIGA's Policy on Environmental and Social Sustainability (2013) because impacts are site specific and readily mitigated. Key potential environmental and social risks and impacts include water use and management, soil conservation and management; nutrient management, chemical and hazardous materials management, waste management, biodiversity and ecosystems (protected and riverine habitats), and worker and community health and safety.

C. Applicable Standards

While all Performance Standards are applicable to this investment, our current information indicates that the investment will have impacts which must be managed in a manner consistent with the following Performance Standards:

- PS1: Assessment and Management of Environmental and Social Risks and Impacts
- PS2: Labor and Working Conditions
- PS3: Resource Efficiency and Pollution Prevention
- PS4: Community Health, Safety and Security
- PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resource

SilverStreet and SVL completed the purchase of existing titled farms and titled expansion land at Aussenkehr. Physical resettlement or economic displacement is not envisioned for this Project; therefore PS 5 (Involuntary Land Acquisition) is not triggered at this time. PS 7 (Indigenous Peoples) and PS 8 (Cultural Heritage) do not apply to the Project as there are no indigenous peoples or cultural heritage in the direct area of influence. A chance finds procedure consistent with the requirements of PS 8 has been provided within SVL's Archaeological Resource Management procedures as part of its environmental and social management system.

In addition, the following World Bank Group (WBG) Environmental, Health and Safety (EHS) Guidelines are applicable to this project:

- WBG General EHS Guidelines
- WBG EHS Guidelines for Perennial Crop Production.

Furthermore, IFC / EBRD's Workers' Accommodation: Process and Standards (2009) is applicable to SVL's operations.

D. Key Documents and Scope of MIGA Review

The following documents were reviewed by MIGA:

- Environmental and Social Action Plan, July 2016;
- SilverStreet SICAR Unaudited Quarterly 1 Report, March 31, 2016 (confidential);
- E&S related procedures, including draft Human Resources Policy and Procedures, Environmental and Social Risk Assessment; Emergency Preparedness and Response Procedure; Chemicals Handling, Storage and Disposal; Procedure for Management of Pesticides; Procedure for Handling, Maintenance and Storage of Gas Canisters; and Procedure for Handling, Storage and Disposal of Hydrocarbons.
- Environmental Assessment for the Silverlands Agricultural Project in Aussenkehr, Namibia: Scoping Report, prepared by GEO Pollution Technologies, April 2016;
- OPIC Environmental and Social Action Plan, December 2015;
- ESG Action Plan – Silverlands Vineyards, prepared by SilverStreet, July 2015;
- SilverStreet Investment Committee paper for Aussenkehr, July 2015, which includes the ESG Due Diligence Report;
- Stakeholder Engagement Plan and Grievance Mechanism, prepared by Silverlands Vineyards Limited, June 2015; and
- Responsible Investment Code Annex (RIC), SilverStreet Capital, January, 2012.

MIGA's due diligence is coordinated with that of OPIC. An Environmental and Social Action Plan (ESAP, attached to this ESRS) has been developed to address gaps between the current project documentation and the requirements of the PSs.

E. Key Issues and Mitigation

PS1: Assessment and Management of Environmental and Social Risks and Impacts

Social and Environmental Assessment: SilverStreet has a dedicated manager solely for Environmental, Social and Governance (ESG) matters. At the country level, Silverlands' management team includes a dedicated resource to oversee E&S matters at each of its investments. The Fund maintains a Responsible Investment Code (RIC) applicable to each investment. Prior to making investments, the Fund prepares an ESG due diligence report as part of its investment commitment process based on its RIC. This report assigns scores based on the following criteria: human rights, labor rights, environment/climate, health and safety, animal welfare and community development. The scoring allows for the Fund to assess, monitor, improve, and track compliance over time. The Fund is focused on promoting continuous improvement in the E&S management of each of its portfolio investments.

The Fund's ESG due diligence report for SVL did not identify material E&S concerns; however areas of improvement were identified and included in an ESG Action Plan developed as part of the Fund's due diligence. The plan includes commissioning an environmental and social impact

assessment (ESIA) to assess the impact of expanding the irrigated vineyard operations and updating the ESG Action Plan with findings from the ESIA, implementing the Social and Environment Management System (SEMS) including further gap analysis and revisions to take place as the Project develops, implementing compliant recycling and waste disposal facilities, implementing compliant equipment wash bays, building new management housing, assessing how to improve worker housing, assessing how to improve transportation for workers, and assessing government land projects to decide how to collaborate with nearby community farmers.

SVL has engaged an environmental consultancy (Geo Pollution Technologies) to carry out an ESIA focused on a larger area than just the current SVL project. The scope of the assessment covers auditing the existing farm areas, assessing the potential E&S impacts and benefits resulting from developing the expansion area, and formalizing the various policies and procedures (including those followed for GLOBAL G.A.P. certification) into a comprehensive environmental and social management plan. Specific items identified in the due diligence process to be assessed by the ESIA include: impacts on surrounding legally protected and internationally recognized areas, the riverine habitats at Aussenkehr and community health and safety matters. Overall, risks associated with water use and management, chemical and hazardous materials management, waste management, worker and community health and safety, and impacts to protected and riverine habitats are not expected to be significant, and will be monitored and mitigated through the implementation of an environmental and social management plan (ESMP). This will be verified through the ESIA currently being carried out, as per the ESAP.

Management Program and Monitoring: As a condition of financing, SZL committed to operate according to good industry practices and comply with the national environmental laws and regulations, MIGA's 2013 Performance Standards, the ILO Fundamental Conventions on Freedom of Association and Collective Bargaining; Forced Labour; Child Labour; and Non-Discrimination, 1994 United Nation Framework Convention on Climate Change and the associated 2005 Kyoto Protocol ("UN Framework Convention"), 2004 Organization for Economic Cooperation and Development ("OECD") Principles of Corporate Governance, the UN Convention on Biological Diversity, and international good practice to address animal welfare.

Existing farm operations conform to GLOBAL G.A.P. (voluntary standards to promote good agricultural practices). GLOBAL G.A.P. requires each production unit to be assessed annually by independent third party auditors and areas of focus include environmental impacts, use of chemical inputs, and worker health and safety management. GLOBAL G.A.P. also includes requirements for quality and food safety to which the Project adheres.

SVL will fall under the same set of processes and procedures that have been developed to meet the requirements of the Fund's RIC (e.g., social and environmental management system, quarterly reporting to the SVL Board, annual reporting to the Fund, HR manual, contracts, accident logs, emergency response plans, waste disposal, operating procedures, training, etc.). A SEMS has been developed for the project and is currently being enhanced to ensure that roles and responsibilities, risk identification, reporting and monitoring is in line with PS and Fund requirements. Many of the operating procedures supporting the SEMS have been formalized and will undergo review to incorporate any additional risks / impacts and mitigation identified as part of the ESIA. Supporting policies and plans will be incorporated into the ESMP. The ESMP will cover, at a minimum, the following: environmental and social risk identification, roles and responsibilities, storage and disposal of hazardous chemicals, water resources management, soil conservation and management,

biodiversity management, community consultation process, human resources management, health and safety management, emergency response, and security management.

The farms have been monitoring and internally reporting on EHS, occupational health and safety (OHS), and data on use of water, electricity, Global G.A.P. certification, etc. Audit areas which are monitored and reported on a monthly basis include employee numbers, lost time injuries, training events, grievances, notable stakeholder engagements, water usage, energy usage, as well as annual water quality results. The latest Global G.A.P. audit findings (2015) identified some non compliances of ‘major-must’ items which have now been resolved. Monitoring will be detailed in the ESMP and will include items such as monitoring of surface water quality, potable water sources, biological parameters (in consultation with regulatory authorities), and noise. SVL will also monitor influx and traffic movements within the project boundaries. The ESMP, along with procedures and systems for reporting against key E&S aspects, will be implemented at the project and training on the procedures will be provided to employees. SVL will oversee contractors and ensure E&S commitments are followed. E&S performance monitoring will be submitted to MIGA.

Organizational Capacity and Training: Since acquiring the properties, SVL has put in place a skilled Farm Manager to oversee the existing operations and expansion. The Farm Manager maintains the overall responsibility for EHS and Social management at SVL. An EHS team has been established and reports to the Farm Manager. The EHS team has the responsibility to implement and monitor the SEMS, prepare annual EHS management programs, including adoption and certification of G.A.P. standards, develop and provide EHS training, monitoring, and reporting. SVL has committed to allocate adequate resources on an ongoing basis to achieve effective E&S performance. SVL E&S requirements will be included in contractor legal agreements. The Fund has experience with MIGA’s Performance Standards for earlier investments and has shown commitment to E&S management and generally, continuous improvement on E&S matters. SVL will as per the action in the ESAP, in consultation with the neighboring community, explore initiatives which could be supported by SVL to help assist the development of the area.

Emergency Preparedness and Response: SVL has prepared an emergency response procedure for its vineyards including the risks of chemical spillage, accidents, transportation safety and first aid requirements. SVL has carried out a fire safety review to establish appropriate signage, fire detection and alarm systems at the farms. Drills will be carried out on a regular basis. Relevant employees will be trained on basic firefighting skills. A report on the frequency of fire drills will be provided to MIGA and OPIC in the annual monitoring report.

PS2: Labor and Working Conditions

Human Resources Policy and Procedures: SVL employs approximately 146 permanent workers and about 1000 seasonal workers during the harvest period from November to January. SVL anticipates hiring about 200 workers for the expansion program. SVL manages its human resources in accordance with internal procedures that cover staff selection and career development aspects, including recruitment process, job descriptions, induction, safety training and working instructions. Under the Fund’s RIC, all employees are required to have a contract. SVL reports that all employees at the Project have written contracts which are compliant with the Substantive Agreement. SVL is bound by the Substantive Agreement of the Namibia Farm Workers’ Union; about 80% of the permanent workers are part of the Union. Under SVL management, all employees have the right to join any union, as well as the ability to bargain collectively. The Substantive Agreement covers

job classifications, wages and wage structure, benefits, subsistence allowance, housing allowance, and protective clothing. The Project has developed a draft Human Resources (HR) policy and handbook which is materially consistent with PS 2. It is available to every employee of SVL and summarizes Namibian laws and workers' rights, including the grievance mechanism (GM) which includes a GM for female employees. New workers are made aware of the GM during induction and anonymous grievances can be lodged in writing in the suggestion box on site or via a dedicated phone line soon to be established. Union representatives regularly engage with farm workers.

The Project does not employ minors, and this commitment is incorporated into the HR Policy by requiring workers to have National Registration Cards. SVL will ensure that all employees are paid at least if not better than the minimum wage. SVL will also oversee their supply chains as per PS 2 should an out-grower program be supported.

Worker accommodation: SVL is undertaking improvements to management housing as part of the expansion plans, to standards which are consistent with the IFC and EBRD Guidance Note Workers' accommodation: processes and standards (2009). Most of the permanent staff and all temporary staff live in the township north of SVL. During harvest, the farm recruits approximately ten times its number of permanent staff. Housing in the township is limited and the township lacks running water, proper sanitation, bathing and clothes-washing facilities. The regional government is working on addressing this issue, which has received media attention (see PS 4 for additional details).

Occupational health and safety (OHS): SVL has carried out an OHS risk assessment for its vineyard operations and is developing OHS procedures and training plans. SVL will provide a safe and healthy work environment for permanent and seasonal workers and is developing a system to record all accidents/incidents and to include root cause analysis. The project is also improving its practices for the storing, transporting, and disposing of hazardous materials. The project will undertake the following measures to ensure EHS standards are met: carry out job hazard assessment, provide adequate personal protective equipment ("PPE") and monitor its use, ensure that staff receive regular re-training with the chemical supplying companies, carry out monitoring for compliance, and keep records of all chemicals used on the farms.

SVL has included information on HIV / AIDS as part of worker induction programs and will liaise with medical personnel to raise awareness within the workforce. SVL has purchased buses to provide safer transportation for workers to/from the project. Given the high temperatures, workers are provided with ample drinking water, shade, PPE (hats), and sufficient breaks.

Training: SVL has developed a training plan to ensure that all staff and contractors are trained in implementation of the ESMP. Many of the workers have limited experience of having a formal job, so training is a vital component for SVL. Training for workers and contractors covers occupational health and safety aspects as well as environmental and social topics such as spill clean-up, prevention of water contamination, first aid, waste management, emergency response, chance finds procedures, etc.

PS3: Resource Efficiency and Pollution Prevention

Key mitigation measures to minimize environmental impacts include:

Soil conservation and management: Soil conservation and pollution prevention will be included in the ESMP to ensure that infrastructure development (drainage) and operations (irrigation) of the Project will not adversely impact on soils. It is anticipated that industry good practice mitigation measures will be followed. As the Orange River Valley experiences extremely hot and dry summers, mitigation will be needed to minimize dust generation. A veld management plan will be implemented based on soil and terrain mapping, and will include soil loss prevention. Soil testing will be carried out to monitor structure and properties. A nutrient management plan will be developed in consultation with suppliers to ensure fertilizer applications are minimized.

Surface and groundwater water quality: Water supply to Aussenkehr is from the Orange River. Due to limited rainfall events, there is a low probability of pollution from spills being washed into the Orange River. However, site drainage will be assessed to take into account the effects of occasional flash floods and to ensure appropriate mitigation is implemented to minimize adverse impacts to infrastructure, including landfills.

Fuel storage and vehicle fueling, vehicle washing and maintenance, and storage of hazardous materials (e.g., diesel, used oil, chemicals) will be located away from water courses and will be located in a management hub under construction. Hazardous materials will be stored on concrete pads with secondary containment. Bunding is constructed under diesel tanks and access to diesel will be controlled.

Liquid and solid waste management: Proper waste management plans have been implemented for the project including the construction of recycling pens from which a contracted company collects the waste. No incinerators are intended for this project.

Loss of vegetation: Minimum access roads for vineyard activities will be constructed and will be confined to already disturbed sites where possible. Disturbed areas will be re-vegetated with appropriate species.

Hazardous Materials Storage: SVL continues to improve practices to properly store and dispose of hazardous chemicals and diesel; it is constructing chemical storage facilities that will be implemented in the near future at the improved management hub, and will incorporate adequate ventilation, lockable doors, appropriate chemical separation, bunded entrance, and signage. Fire extinguishers and spill kits will be housed nearby.

SVL will have a policy of maintaining only necessary supplies of stocks for the intended use period. This approach will prevent the excessive build-up of potentially harmful supplies of stocks. Empty chemical containers will be punctured as part of SVL's provisions for safe disposal. All engine oil that is used by SVL is sent back to the supplier for recycling. Fuel storage tanks have bund walls to contain spillage in excess of 110% of total capacity.

Integrated pest management: The project developed an integrated pest management procedure committing to only using World Health Organization (WHO) approved chemicals.

Resource efficiency: SVL is employing microjet irrigation systems in square or rectangular vineyards across the project site with the majority of vineyards covering about 10 ha. Irrigation

will contribute to consistent yields and each vineyard will be irrigated at given times and duration according to the irrigation schedule. Water usage will be monitored to assess potential leakages and irrigation requirements will be calculated to minimize overwatering. Water usage plans will be kept to develop an understanding of long-term trends. Energy efficiency will be assessed and areas of improvement will be identified once baseline energy usage data is collected and basic improvements at the project are carried out.

Climate change considerations: SVL has committed to monitoring river flow assessment to ensure sustainable water withdrawal rates. SVL has indicated that Aussenkehr is in an area of Namibia which is extremely dry and receives on average less than 50mm of rainfall per annum.

Greenhouse gas emissions: The project is connected to the national electricity grid and the expansion land is being powered by a solar energy facility. There will be limited emissions related to fuel usage for farm equipment and land preparation activities. As part of its monitoring, the project will calculate GHG emissions using internationally accepted protocol. Should emissions be more than 25,000 tCO₂e, GHG emission will be reported annually.

Cumulative impacts of existing projects, the proposed project and anticipated future projects is being considered in the ESIA which is currently under development.

PS4: Community Health, Safety and Security

The village of Aussenkehr has about 10,000 permanent residents and peaks to about 20,000 people (migrant workers, predominantly from the North of Namibia) during peak harvest season (November to January). It is approximately 5 km north of the SVL Project. The village currently has no municipal services. SVL management live within the project boundaries.

SVL will ensure that other infrastructure elements on the farming unit are designed, constructed, operated, and decommissioned in accordance with good international industry practice (GIIP), taking into consideration safety risks to third parties or affected communities. The project is located within the area designated for agriculture. Key community health and safety risks are related to traffic safety, chemicals management, influx (of seasonal workers), and health impacts.

Transportation: SVL has purchased buses to transport workers to/from the project. Further traffic management plans will be developed to ensure monitoring fitness of drivers, speed limits, cell phone usage, etc. is addressed. A third party contractor transports the grapes from the pack house to the destination market.

Chemicals management: Chemicals are stored in secure locations not accessible to the general public or general workforce.

Influx management: Expansion of SVL will increase employment in the area, and thus influx may occur. Additional people would put further pressure on the existing very limited infrastructure in the informal settlement and on the natural resources in the area. SVL will need to monitor influx and work with local authorities and other farmers to address impacts, including potential cumulative impacts related to the SVL project.

Health impacts: To complement national programs, SVL is developing plans to enhance accessibility to health services for its workers and nearby communities. Awareness and education on sexually transmitted diseases will be provided to workers and to local communities. SVL is committed to working with the Ministry of Health to develop measures to manage disease and raise awareness on public health matters. SVL is also implementing HIV/AIDS policies as well as raising awareness within its workforce.

Lakeside farm currently has a storage reservoir which is fenced to prevent unauthorized access. The storage reservoir is regularly monitored to ensure its structural integrity. The likelihood of a breach is low; however, should there be a breach, water would flow to a vineyard.

Security Arrangements: The farms are fenced with controlled access points. SVL has engaged guards directly. Training on human rights and security is planned for the near future. SVL has developed a security procedure which will be enhanced by developing a security risk assessment and security management plan in line with PS 4 requirements, as per the ESAP.

PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resource

The area surrounding Aussenkehr and downstream on the Orange River is of strategic biodiversity interest to Namibia and to South Africa. SVL is surrounded/adjacent to protected lands (the Aussenkehr Nature Reserve to the east, Richtersveld National Park to the west, Richtersveld World Heritage site to the north, and the Orange River immediately adjacent to the Project. Downstream at the Orange River mouth at Alexander Bay is the Gariep River Mouth Nature Reserve.

Protection and Conservation of Biodiversity: Aussenkehr was developed 2-3 decades ago as an area to grow table grapes and most of the valley has been transformed by agricultural activities. The irrigated vineyards provide green vegetative cover in a rugged desert landscape. Although there are protected areas around the SVL Project, SVL activities are not expected to cause significant adverse impacts. The farms use water minimally in the vineyards to prevent erosion, chemical usage is minimal, dead leaves are used as mulch to reduce excessive evaporation, and vineyard maintenance is regularly carried out. Impact significance will be verified in the ESIA, as well as include an assessment of cumulative impacts. The ESIA being carried out is assessing the riverine habitats at Aussenkehr to ensure that they are not critically endangered. If critical habitat is identified in the ESIA, measures to ensure no net loss of biodiversity will be needed as well as biodiversity management plans.

Water withdrawal for the SVL Project represents <0.2% of flow in the Orange River; thus such a small percentage of withdrawal is not anticipated to adversely impact the river system. The company will carry out monitoring for both water quality and water volume upstream and downstream of their operations. Ecosystem services in this area are centered more on the Orange River and the project's impact on this River will be limited.:

Sustainable Management of Living Natural Resources: The Company has committed to maintaining certification under an appropriate voluntary sustainability standard that promotes good agricultural practices and which is recognized globally, regionally or nationally. Currently SVL has received GLOBAL G.A.P. certification.

F. Environmental Permitting Process and Community Engagement

Under the Namibian Environmental Management Act, 2007, taking over an existing farming operation does not require an Environmental Audit. In addition, expansion of existing properties is not covered by the Act. However, any land development that proposes abstraction of water from an international river such as the Orange River and/or proposes the implementation of an irrigation scheme will require an Environmental Impact Assessment. The Project has commenced an Environmental and Social Impact Assessment. Once completed a copy will be submitted to OPIC / MIGA for review. The Project has its permit for water withdrawal from the Orange River.

There are no households or communities in the immediate vicinity of the vineyards. SVL has initiated consultation activities, including putting announcements in the press and posting information onsite. SVL identified a range of stakeholders who may be interested in the Project and sent notification letters to inform them about the proposed development and invited them to submit comments. As the Project is on the border with South Africa, various international related agencies were also informed. Informal stakeholder meetings were held to provide an opportunity for questions and concerns to be raised. Main concerns raised were related to electricity constraints in Aussenkehr, land tenure, worker housing, employment requirements, and dust emissions. SVL is working through the comments related to the Project to address them as part of the ESIA.

A Stakeholder Engagement Plan (SEP) has been developed to address the process of communication and dialogue that will be maintained with the local communities adjacent to SVL. The SEP is supported by a stakeholder engagement map. The SEP defines a technically and culturally appropriate approach to share information on a timely basis, to provide sufficient opportunity for stakeholders to express their opinions and concerns, and to ensure that legitimate concerns are incorporated into project decision-making processes. A grievance procedure has been implemented. A stakeholder committee will be established to facilitate communication with key stakeholder groups. SVL is committed to carry out ongoing dialogue with stakeholders.

G. Availability of Documentation

The below listed documentation is available electronically as PDF attachments to this ESRS at www.miga.org. It is also available for viewing at the following locations:

- [Environmental and Social Action Plan, July 2016;](#)
- [Environmental Assessment for the Silverlands Agricultural Project in Aussenkehr, Namibia: Scoping Report, prepared by GEO Pollution Technologies, April 2016;](#) and
- [Stakeholder Engagement Plan and Grievance Mechanism, prepared by Silverlands Vineyards Limited, June 2015.](#)

The documents listed above are available upon request by contacting Kevin Liddle, Silverlands Vineyards Limited, Finance Director via kevin@silverlands.com.

In addition, Affected Communities have unrestricted access to the Compliance Advisor/Ombudsman (CAO), the independent accountability mechanism for MIGA. The CAO is mandated to address complaints from people affected by MIGA-guaranteed business activities in a manner that is fair, objective, and constructive, with the goal of improving environmental and social project outcomes and fostering greater public accountability of MIGA.

Independent of MIGA management and reporting directly to the World Bank Group President, the CAO works to resolve complaints using a flexible, problem-solving approach through its dispute resolution arm and oversees project-level audits of MIGA's environmental and social performance through its compliance arm.

Complaints may relate to any aspect of MIGA-guaranteed business activities that is within the mandate of the CAO. They can be made by any individual, group, community, entity, or other party affected or likely to be affected by the environmental or social impacts of a MIGA-guaranteed business activity. Complaints can be submitted to the CAO in writing to the address below:

*Compliance Advisor/Ombudsman
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2121 Pennsylvania Avenue NW
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Tel: 1 202 458 1973
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E-mail: cao-compliance@ifc.org*

Environmental and Social Action Plan for Silverlands Vineyards

August 2016

No.	PS	Action Required	Milestones and Dates
1	1	Submit a copy of the ESIA upon completion, and address any new risks identified in the ESIA in the ESMS	Upon Completion of the ESIA
2	2	Submit revised human resources policies that are consistent with the Namibian labor code and cover the components of PS 2, specifically addressing the following topics: <ul style="list-style-type: none"> • Procedures on how overtime work is allocated and approved that align with Namibian labor law; updated timekeeping procedures to include the electronic tag system, and reference to the section of the Namibian labor code that permits guards 60 hours of regular work per week. 	October 31, 2016
3	2	Develop and submit an appropriate internal labor monitoring and compliance policy that specifically addresses due diligence and monitoring against PS 2 on labor and working conditions at the Project, including contractors/sub-contractors and the supply chain, to include: <ul style="list-style-type: none"> • Identification of individual(s) responsible for monitoring, • Timetable that delineates the frequency of monitoring, • A monitoring checklist/questionnaire that incorporates labor laws, regulations and requirements (including the requirements of PS 2), A program to interview direct, temporary, contracted and sub-contracted employees and contains guidelines for identifying non-compliance indicators “on the ground.” 	October 31, 2016
4	2	Provide evidence that SVL Management Housing is built to standards set out in the IFC EBRD Workers Accommodation: Process and Standards (August 2009) guidance note.	Semi-Annual until completion
5	3	Provide a final Procedure for Management of Pesticides that includes viticulture specific integrated pest management in the Alternatives to pesticide application section.	September 30, 2016
6	3	Provide evidence that pesticide use follows WHO guidelines	September 30, 2016 and Annual E&S Report

7	3	Provide a final Water Monitoring Procedure in response to any findings in the ESIA.	Within 3 months after completion of the ESIA
8	3	Address cumulative water impacts either by including the cumulative impact report in the Project's ESIA, or other impact assessment documentation specific to the project, especially as in response to the possible sensitivity of the riverine habitat.	Upon completion of the ESIA
9	3	Provide evidence that soil resources and water runoff are well managed such that agro-chemical run off does not reach the river or infiltrate any drinking water resources.	September 30, 2016 and Annual E&S Report
10	4	Develop a community health plan in conjunction with local authorities and surrounding farming communities.	Plan to be submitted by February 28, 2017. Updates reported as part of Annual E&S Report