Summary of Comments Received During the First Consultation for the Perennial Plantation Crop Production EHS Guideline

GENERAL

- Consider adding tea and bamboo.
- Consider adding reference to the EHS guidelines for Vegetable Oil Processing, Sugar Manufacturing and Food and Beverage Processing.
- Many farm and forestry operations do not require formal ESIA and are managed through the Forest or Farm Management Plan as the basis for risk identification and mitigation.
- This guideline should address the issue of "land grabbing" or the acquisition of large acreage of land. These Guidelines should also address supply chain considerations for agro-projects and should also address long-term leases.
- There should be guidance provided on Ethanol Manufacturing as several private sector developers are engaged in ethanol manufacturing.

ENVIRONMENT

- Consider higher biodiversity value plant species for buffer zones and field borders."
- Add further information and definitions of "manure"; "fertigation" and "appropriate technical equipment for spraying manure."
- Add section on organic waste effluent and leaching and how to avoid polluting soil and water ways.
- Provide further details of how to dispose of solid waste, especially chemical containers.
- Provide guidance on how to calculate GHG emissions from an agricultural enterprise.
- recommend more stringent sectoral requirements for use of crop nutrients and pesticides where plantation cropping abuts or is upstream of sensitive areas.
- strengthen water resource management guidance by addressing relationships between available water resources and project-induced water use redistribution impacts as well as plantation water consumption itself.
- Suggest a paragraph addressing traffic modelling and associated air quality modelling for urban road and large road infrastructure projects including but not limited to toll roads.
- Coverage of water quality issues in sector-specific guidance, e.g., plantation crops, is limited. Consider enhancing the general environmental guidance on water to provide guidance on water quality and freshwater resource management for non-industrial sectors. Guidance could address water quality and flow issues such as dissolved oxygen, acid soils, aggregate pollutant burdens.
OCCUPATIONAL HEALTH AND SAFETY

- Add reference to the ILO Convention 184 (2001) on safety and health in agriculture as a basis for the issues that need to be covered. More technical guidance can be found in the ILO code of practice on safety and health in agriculture (2011).

SECTION 3: REFERENCES

- Update reference links so we are searching the most recently available references.