

Consorcio Ruta 10, Lote 1 – PARAGUAY
Environmental and Social Action Plan (ESAP)

No.	Aspect	Action	Output	Delivery Date
ND 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Environmental and Social Management System	1. Develop and implement the Environmental and Social Management System (ESMS) for the construction phase, which shall include: i) a policy; ii) procedures for identifying risks and impacts; iii) management programs; iv) a description of the organizational capacity and required competencies; v) emergency preparedness and response protocols; vi) a stakeholder engagement plan; vii) protocols for external communication and grievance mechanisms; viii) requirements for ongoing information sharing with affected communities; and ix) monitoring and review procedures.	1. ESMS Manual for Construction.	1. Prior to the first disbursement and as well as subsequently, as part of the Environmental and Social Compliance Report (ICAS).
1.2	Policy	1. Develop, adopt, and disseminate (at all levels of the organization, including contractors, subcontractors, suppliers, and other internal and external Project stakeholders) an Environmental and Social policy that ensures compliance with all applicable laws and regulations, both locally as well as internationally.	1. Environmental Policy.	1. Prior to the first disbursement and as well as part of the ICAS.
1.3	Identification of Risks and Impacts	1. As well as the final design (adjusted alignment, <i>greenfield</i> sections, and urban crossings), update the risk and impact assessment of the EIA-p.	1. Assessment of the environmental and Social impacts of the construction phase, updated in the EIA-p.	1. Before the first disbursement
		2. Prepare a Rapid Cumulative Impact Assessment (RCIA) that considers not only the impacts of the Project but also those caused by existing mining activities and by any projects that may be developed in the future.	2. Rapid Cumulative Impact Assessment (RCIA)	1. Before the first disbursement
		3. Develop a consolidated matrix for the construction phase that documents, among other aspects, the identified risks, impacts, management measures, and process and success indicators.	3. Risk and Impact Matrix for the Construction Phase.	3. Before construction begins
		4. Using the mitigation hierarchy, prepare socio-environmental validation sheets that justify the selection of sites for camps, job sites, plants, workshops, quarries, borrow areas, surplus material storage areas (DME), temporary access roads, or haul routes.	4. Validation Sheets	4. Prior to the development, construction, or operation of each auxiliary facility or material source
		5. Using a comparative matrix, supplement the analysis of route alternatives, focusing on the new (<i>greenfield</i>) sections and on the potential physical or economic displacements that the proposed alternatives may cause.	5. Alternative Analysis Evaluation Matrix.	5. Before the first disbursement
1.4	Gender	1. Based on a project-specific Gender Risk Analysis, develop and implement a Gender Management Plan (GMP) that includes: i) specific actions to manage the identified risks; ii) the implementation of a Code of Conduct for workers and contractors, with an express prohibition against discrimination, violence, and harassment based on gender; iii) training requirements regarding the content and implementation of the plan; and iv) measures aimed at expanding the Project's benefits for women, as well as their participation as workers and suppliers	1. Gender Management Plan	1. Within 60 days of the first disbursement and as well as being part of the ICAS
1.5	Management Programs	1. Consolidate an Environmental and Social Management Plan (PGAS) for the construction phase that: i) integrates the plans and programs of the Environmental and Social Action Plan (PASA); ii) includes additional measures to manage (a) new impacts and associated risks and (b) impacts	1. Environmental and Social Management Plan	1. Before the first disbursement

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		associated with auxiliary components; iii) includes (a) key Environmental and Social performance indicators (KPIs), (b) mechanisms for periodic monitoring, and (c) clear responsibilities for its implementation and oversight; and iv) incorporates updates to the Waste Management, Hazardous Materials Management, Air Quality Management, and Noise and Vibration Management plans.		
1.6	Organizational Capacity and Competence	1. Develop a Staffing Plan that describes the positions, duties, responsibilities, and reporting lines of the staff (including contractors) currently hired and to be hired to manage the Project's environmental and social, labor, and health and safety performance.	1. Staffing Plan	1. Within 60 days of the first disbursement
1.7	Emergency Preparedness and Response	1. Update the Emergency Preparedness and Response Plan (EPRP) for the construction phase to include, among other aspects: i) an assessment of potential risks and impacts on local communities; ii) procedures for providing information to communities about the plan; iii) procedures for informing communities in the event of an actual emergency; iv) protocols for coordinating with local, regional, and national authorities responsible for managing emergencies; v) the location of evacuation routes and assembly points; vi) protocols for mobilizing emergency response teams; vii) instructions for internal communication (within the Project) and external communication (with the community and authorities) in the event of an emergency; and viii) training requirements outlined in the plan.	1. Updated Emergency Preparedness and Response Plan	1. Before the first disbursement
1.8	Involvement of Social Stakeholders	1. Modify the Stakeholder Communication and Road Corridor Clearance Program to transform it into a Stakeholder Engagement Plan that includes: i) a continuously updated stakeholder map, including the identification of representatives and institutions associated with each group, as well as a specific characterization of vulnerable populations potentially affected by the project; ii) an overview of all public consultation activities related to the Project that have been carried out; iii) a summary of stakeholder engagement activities related to the Project; and iv) a summary of the Project's social management and social investment programs.	1. Stakeholder Engagement Plan	1. Prior to the first disbursement
1.9	Community Complaint Mechanisms	1. Update the Projects' Community Grievance Mechanism so that: (i) it details the procedure for publicizing the mechanism; (ii) it allows complainants to appeal the process; (iii) it accepts anonymous complaints; (iv) it can address complaints from vulnerable groups; v) does not prevent complainants from using any other complaint mechanism provided for by law; and vi) provides for a specific procedure to handle complaints related to sexual harassment (as well as a high-priority category), including measures to safeguard the integrity of the person subjected to such abuse while the complaint is being addressed.	1. Updated Community Complaint Mechanism	1. Before the first disbursement
ND 2: Work and Working Conditions				
2.1	Working Conditions and Management of Labor Relations	1. Develop a Project Human Resources Policy that includes: i) a commitment to comply with applicable laws; ii) information on labor and terms of employment; iii) procedures for hiring, promoting, and terminating workers; iv) recognition of workers' freedom to form or join labor unions and to engage in collective bargaining; v) the Project's commitment to non-discrimination and to providing equal opportunities in the workplace; and vi)	1. Updated Human Resources Policy	1. Prior to the first disbursement

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		an explicit prohibition on the use of child labor or forced labor in the Project.		
		2. Develop and implement a Camp Management Procedure that includes: i) a definition of responsibilities for the administration and supervision of the facilities; ii) minimum standards for habitability, hygiene, safety, and maintenance; iii) criteria for the occupancy of dormitories and the use of sanitary facilities; iv) procedures for periodic inspections and the recording of findings; v) mechanisms for managing food, waste, and sanitary conditions; and vi) requirements for disseminating the rules of conduct and the PQRS mechanism to all housed workers.	2. Camp Management Procedure	2. Before the start of construction and as well as part of the ICAS
2.2	Internal Complaint Handling Mechanism	1. Update the Project Workers' Complaints Mechanism so that: (i) it allows complainants to appeal the process; (ii) it accepts anonymous complaints; (iii) it includes ways to address complaints from vulnerable groups (particularly women and members of indigenous communities); iv) does not prevent complainants from using any other complaint mechanism provided for by law; and v) provides for a specific procedure to handle complaints related to sexual harassment, including measures to safeguard the integrity of the person subjected to such abuse while the complaint is being addressed.	1. Updated Workers' Complaint Mechanism	1. Before the first disbursement
2.3	Housing and Welfare Services for Workers	1. Develop a procedure to ensure that the camps: (i) comply with local laws and international best practices; (ii) include dining areas, rest areas, restrooms, changing rooms, and laundry facilities.	1. Camp Monitoring Procedure	1. Before Construction Begins
2.4	Workforce Reduction	1. Develop a workforce reduction plan.	1. Workforce Reduction Plan.	1. Six months before the end of construction
2.5	Occupational Health and Safety	1. Develop and implement Occupational Health and Safety (OHS) procedures that include: i) the definition of responsibilities and lines of supervision; ii) the identification and control of occupational hazards; iii) operational controls for high-risk activities; iv) requirements for the management and supervision of contractors and subcontractors; v) training and orientation programs; vi) procedures for reporting, investigating, and closing out incidents and accidents; and vii) performance indicators, monitoring mechanisms, and continuous improvement processes.	1. OSH Procedures	1. Prior to the start of construction and as well as part of the ICAS
2.6	Third-Party Contractors	1. Develop and implement a Contractor Management Plan that includes: i) hiring criteria; ii) mechanisms for monitoring work performance; and iii) contractual provisions establishing obligations regarding working conditions, Occupational Health and Safety, and the prevention of child and forced labor.	1. Contractor Management Plan	1. Prior to the start of construction and as well as part of the ICAS
2.7	Supply Chain	1. Update the Code of Conduct for Suppliers and Contractors so that: (i) it expressly prohibits the use of child and forced labor throughout the entire production chain; ii) require them to (a) implement the measures deemed necessary to protect the health and safety of their workers, (b) comply with national labor regulations, (c) respect human rights, and (d) maintain legal integrity; iii) have environmental, health, and safety management processes in place that are similar to those applicable to the Project; iv) prohibit them from significantly converting natural habitats in the extraction, processing, and marketing of their products; and v) include measures to ensure the dissemination of the code and monitoring indicators.	1. Updated Code of Conduct for Suppliers and Contractors	1. Before the first disbursement
ND 3: Resource Efficiency and Pollution Prevention				

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3.1	Resource Efficiency	1. Conduct a disaster risk and climate change assessment study for the Project that includes the necessary resilience measures.	1. Study on climate change and natural disaster risk.	1. Within 60 days of the first disbursement
		2. Submit a report on the Greenhouse Gas (GHG) emissions (Scopes 1 and 2) generated by the Project during the construction phase.	2. GHG Inventory	2. Annually during construction
ND 4: Community Health and Safety				
4.1	Community Health and Safety	1. Develop and implement a Traffic Management Plan for the construction phase that includes: (i) measures to manage potential risks and impacts associated with the increase in traffic generated by the Project in local communities; and (ii) requirements for (a) safe driving and (b) training for Project drivers.	1. Traffic Management Plan during construction.	1. Prior to the start of construction and as well as part of the ICAS
		2. Develop and implement a Road Safety Plan that includes: i) identification of routes and schedules for the movement of trucks and machinery; ii) assignment of personnel to direct vehicle traffic on detours or roads with restricted traffic; iii) instructions to drivers of company-owned or contracted trucks for driving through socially sensitive areas, as well as a detailed list of permitted and prohibited actions; iv) procedures for washing tires upon exiting work sites or quarries; and v) procedures for continuously monitoring the condition and operational status of vehicles to be used in the Project.	2. Road Safety Plan	2. Within 30 days of the start of construction and as well as being part of the ICAS
		3. Develop and implement a Community Health and Safety (CHS) Plan with measures to manage non-traffic-related risks and impacts in the community.	3. Community Health and Safety Plan	3. Within 30 days of the start of construction and as well as being part of the ICAS
4.5	Security Personnel	1. Develop and implement a Security Management Plan that includes: (i) an assessment of security risks to the Project; (ii) procedures for screening security personnel for a history of human rights abuses; (iii) procedures for the use of force; and (iv) training requirements on human rights and the use of force.	1. Asset Security Management Plan	1. Prior to the first disbursement and as well as thereafter, as part of the ICAS
ND 5: Land Acquisition and Involuntary Resettlement				
5.1	Displacement	1. Prepare and implement a Livelihood Restoration Plan (LRP).	1. Involuntary Resettlement Plan	1. Before construction begins on sections requiring physical or economic resettlement, as well as later as part of the ICAS
		2. Conduct an audit of the PRMV implementation process to determine whether the post-resettlement conditions for economically displaced individuals are at least equal to, if not better than, those they had prior to resettlement.	2. Audit Report	2. Two years after completion of the PRI
ND 8: Cultural Heritage				
8.1	Procedure for Incidental Findings	1. Prepare, disseminate, and implement a procedure for chance discoveries.	1. Procedure for Incidental Findings	1. Before the start of construction and as well as part of the ICAS