

Consorcio Avanza Ruta 10, Lote 2 – 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 part of the Environmental and Social Compliance Report (ICAS).
1.2	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 (greenfield) 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
1.3	Gender	1. Based on a Project-specific Gender Risk Analysis, develop and implement a Gender Management Plan (GMP) that includes: i) measures to manage Project-specific gender risks; ii) application of the Code of Conduct for Workers—applicable to contractors—which prohibits discrimination, violence, and harassment based on gender; iii) training requirements for project workers (including contractors) regarding the plan; iv) measures to maximize the benefits of the Project for women (as well as workers and suppliers); and v) indicators to measure its effectiveness.	1. Gender Management Plan	1. Within 60 days of the first disbursement and as well as thereafter as part of the ICAS
1.4	Management Programs	1. Develop an Environmental and Social Management Plan (PGAS) for the construction phase that: i) integrates the plans and programs of the Socio-Environmental Action Plan (PASA); ii) includes additional measures to manage (a) new impacts and associated risks and (b) impacts 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	1. Environmental and Social Management Plan	1. Before the first disbursement

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		Management plans.		
1.5	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, social, labor, and health and safety performance.	1. Staffing Plan	1. Within 60 days of the first disbursement
1.6	Emergency Preparedness and Response	1. Update the Emergency Preparedness and Response Plan (PPRE) 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 notifying communities in the event of an actual emergency; iv) coordination protocols with local, regional, and national authorities responsible for emergency management; 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. Emergency Preparedness and Response Plan	1. Prior to the first disbursement
1.7	Involvement of Social Stakeholders	1. Amend 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
1.8	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. 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 Projects Human Resources Policy that includes: i) a commitment to comply with applicable laws; ii) information on working conditions and terms of employment; iii) procedures for hiring, promoting, and terminating employees; iv) recognition of employees' 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 work ; and vi) an explicit prohibition on the use of child labor or forced labor in the Project.	1. Updated Human Resources Policy	1. Prior to the first disbursement
		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	2. Camp Management Procedure	2. Before construction begins and as well as subsequently as part of the ICAS

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		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 resident workers.		
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 (especially 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. Prior to the first disbursement
2.3	Housing and Welfare Services for Workers	1. Develop a procedure to ensure that camps: (i) comply with local laws and international best practices; (ii) include dining halls, 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. As part of the IGAS, develop and implement Occupational Health and Safety (OHS) procedures that include: i) the definition of responsibilities and reporting lines; 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	Workers Hired by Third Parties	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 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 necessary measures 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 the significant conversion of natural habitats during 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	1. Prior to the first disbursement
ND 3: Resource Efficiency and Pollution Prevention				
3.1	Efficient Use of Resources	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 detailing the Greenhouse Gas (GHG) emissions (Scopes 1 and 2) generated by the Project during the construction phase.	2. GHG Inventory	2. Annually during construction

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3.2	Pollution Prevention	1. Based on the identification and assessment of potentially contaminated sites located within the Project's right-of-way, prepare and implement an Environmental and Social Liabilities Remediation Plan.	1. Environmental and Social Liabilities Remediation Plan	1. Within 60 days after the start of construction and as well as part of the ICAS
		2. Assess the quality of the well water used to supply the camp, in order to rule out any contamination associated with mining.	2. Characterization of Groundwater Quality	2. Prior to the well's commissioning
		3. Conduct a pre-construction Baseline study in temporary areas (industrial plant, workshops, and fuel storage areas).	3. Soil quality characterization	3. Before setting up each temporary area
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 an Involuntary Resettlement Plan (IRP) that includes: (i) protocols for engaging with stakeholders; (ii) measures to ensure women's participation in consultation activities related to displacement; (iii) specific procedures for managing complaints related to resettlement; and iv) procedures for (a) compensation for assets at prices equal to or greater than the replacement cost of the property, (b) the restoration of the living conditions and livelihoods of the displaced persons, both physically and economically, to at least the level prior to resettlement, (c) the securing of tenure of the property for all physically displaced households, (d) identifying and providing additional support, as required, to vulnerable persons; (e) monitoring the living conditions and means of livelihood of affected persons; and (f) ensuring women's equitable access to all resettlement compensation and benefits.	1. Involuntary Resettlement Plan	1. Prior to the start of construction on sections requiring physical or economic resettlement, as well as subsequently as part of the ICAS
		2. Conduct a Resettlement Process Audit to determine whether the post-resettlement conditions of persons physically or economically displaced by	2. Audit Report	2. Two years after completion of the PRI

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		the Project are at least equal to, if not better than, those they had prior to resettlement.		
ND 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources				
6.1	Protection and Conservation of Biodiversity	1. Assess the risks and impacts associated with: (i) the loss of natural habitats (forests, savannas, and grasslands); (ii) the potential loss of individuals of sensitive species; (iii) potential habitat fragmentation; (iv) the spread of invasive alien species; and (v) wildlife roadkill, including the identification of sections with the highest probability (hotspots).	1. Assessment of the environmental and social impacts of the updated construction phase.	1. Before the first disbursement
		2. Conduct a Critical Habitat Analysis (CHA).	2. Critical Habitat Assessment	2. Before the first disbursement
		3. Develop and implement a Biodiversity Management Plan (PGMB) in natural habitats, containing actions that, once implemented, will ensure no net loss of biodiversity	3. BMP for NH	3. Before construction begins on non-urban sections, as well as subsequently, as part of the ICAS
		4. In the event that the Project were to materially affect critical habitats, prepare and implement a Biodiversity Action Plan (BAP) containing actions that, once implemented, will ensure a net gain in biodiversity	4. BAP for HC	4. Before the start of construction on non-urban sections and as well as part of the ICAS
6.2	Ecosystem Services Management	1. Conduct an assessment of the Project's potential impacts on ecosystem services.	1. Assessment of ecosystem services.	1. Before the first disbursement
ND 8: Cultural Heritage				
8.1	Procedure for Unplanned Discoveries	1. Prepare, disseminate, and implement a procedure for chance finds.	1. Procedure for Incidental Findings	1. Before the start of construction and as well as part of the ICAS