Environmental and Social Review Summary (ESRS)
TCP Port Expansion Program - Uruguay

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1. General Information of the Project and Overview of Scope of IDB Invest's Review

The Belgian multinational group Katoen Natie is one of the main port and logistics operators globally. Since 2001 it has been the concessionaire of Terminal Cuenca del Plata ("TCP" or the "Company"), the only container terminal in the port of Montevideo, Uruguay, which it has been operating jointly with the Uruguayan Ports Administration (Administración Nacional de Puertos, "ANP")[1]. The concession was renewed in April 2021[2] for a fifty-year term.

TCP has a total concession area of almost 60.4 hectares [3], which, to date, includes about 25.5 ha in an aquatic area and two berths: one of them being 288 m long, built in the 1930s on a reinforced concrete structure suitable for vessels of up to 10.5 m draft; the other one is 350-meter long and was built in 2010 on steel and concrete piles with capacity to allow vessels with drafts of up to 14 m. Both piers, with a total length of 638 m, are equipped with gantry cranes of 22 m between rails. Four of them are "ZPMC" Super Post Panamax with a reach of up to 22 container rows and two are "Vulcan Kocks" Post Panamax with a reach of up to 17 container rows. At the container yard, which is paved with roller-compacted concrete (52%) and articulated concrete bricks (48%) about 34-hectare long operating 34 straddle carriers, 4 Reach Stackers, 6 Empty Stackers [4] and other smaller vehicles and machinery.

TCP offers the following services: i) container loading to and unloading from vessels, trucks and trains; ii) connection and monitoring of refrigerated containers; iii) containers storage (standard and special size, including IMO containers[5]); iv) maintenance, repair and washing of regular and refrigerated containers (including washing IMO containers); v) storage of goods in two buildings with

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1 ANP is a partner with a 20% interest.

2 On April 21, 2021, the Council of Ministers adopted Resolution CM/433/2021; consequently, and in compliance with Resolution CM 401/2021, the KN concession was extended for 50 years until 2081.

3 Including the additional area incorporated to the concession after the 30 m extension to the west of the pier called "Muelle *de Escala"*. This extension was approved by ANP Board of Directors' Resolution R. Dir. No. 87/4 dated February 9, 2023.

4 Straddle Carrier: equipment to transport containers; Reach Stacker: used to transport containers along short distances and stack them; Empty Stackers: stackers of empty containers.

5 The International Maritime Organization (IMO) is the United Nations specialized agency in charge of the safety and protection of maritime transportation and the prevention of marine and air pollution by vessels. IMO containers are those carrying hazardous materials.

a total area of over 7,000 m^2; and vi) consolidation and deconsolidation of containers. Under the current system, Montevideo is a free port[6].

The TCP port terminal expansion project (the "Project") consists in the extension by 23 ha of the Concession land area and the expansion and dredging of the pier area to make it suitable for 14-m-draft vessels, leaving room to admit 16-m-draft vessels if need be in the future.

The Project is Stage V of TCP's Master Plan [7], and it seeks to transform the port of Montevideo into a container traffic hub in the regional port system. The construction works include: i) building the West Pier, which will be about 730 meters long and will be equipped with Super Post Panamax gantry cranes with 30-meter rail gauge; ii) dredging the pier area including sludge and rock excavation, and transporting the removed material for disposal [8]; iii) dredging of the sand from the Arquímedes bank, transporting the sand and using it as landfill for the subaquatic area of the Project [9]; iv) protecting of the Sarandí breakwater [10]; v) paving the pier area and container yard; vi) building ancillary infrastructure; vii) improving of the outer harbor area and maneuvering area (under the jurisdiction of the ANP); and viii) acquiring of the following in the short term (a) 4 gantry cranes for the West Pier and 2 gantry or mobile cranes to replace the cranes in the existing pier, (b) 31 Straddle Carriers, 17 of which would be for the expansion and 14 to replace existing equipment [11]; and (c) 3 new empty container handlers (once the Project enters its operation phase). The Project's construction phase is estimated to take 32 months. Once the Project is finished, the new port terminal will have the capacity to mobilize over 2.5 million TEUs [12] per year.

The E&S due diligence consisted in: i) a visual assessment of the Project site; ii) interviews with the senior personnel of TCP, the consulting firm EIA (TCP's advisor), the ANP and the National Environmental Assessment and Quality Office (DINACEA) of the Ministry of the Environment; iii) meetings with

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6 This means that: i) while remaining in the customs enclosure, the goods are exempt from all taxes, rates or levies applicable to imports; ii) while remaining in the port it is possible to modify the final destination of the goods without any restriction, limitation, permit or prior formality; and iii) there are no limitations as to the stored volume or the time the cargo remains at the port.

7 TCP's Master Plan includes the following stages: i) Stage I: expansion of the land area by 1.5 ha (R.M. No. 358/2002 dated August 27, 2002) with an additional 1.7-hectare expansion. (R.M. No. 707 dated December 27, 2006); ii) Stage II: expansion of the original pier from 288 m to up to 638 m, and expansion of the container yard by 11.5 ha (R.M. No. 561/2006 dated October 23, 2006); iii) Stage III: landfilling of 4.67 ha (R.M. No. 1706//2013 dated December 27, 2013); iv) Stage IV: extension of the land area by up to 5 ha (R.M. No. 1177/2016 of 2016); v) Stage V: the present project.

8 In order to adequately manage the dredging sludge, tests were performed to know its physical and chemical composition; the results indicate that the sludge is not polluted with hazardous substances. A trailing suction hopper dredger will be used to remove the material. The sludge disposal area (defined in the Montevideo Port Master Plan) is located in an area adjacent to the port access channel 40 km to the south west of TCP's terminal.

9 The Arquímedes bank is located about 35 km south of the Montevideo Bay. Bathymetric, archeological and impact studies were performed on the coast before dredging took place, which is necessary to execute several port projects. Landfill of TCP's terminal will involve, in principle, a sand and water mix from a trailing suction hopper dredge (TSHD); however, other methods such as rainbowing or bottom discharge from the main dredger could be used as well.

10 The improvements and protection of the Sarandí breakwater are Project priorities since they will enable continuing with recreational and sports fishing activities. Some of the main tasks planned are: i) repaving; ii) improving lighting; and iii) installing a 235-m-long combiwall-type wall (combined wall made from steel tube piles with intermediate sheet pilings) which is located between the breakwater and the West Pier generating a 25-meter channel between the breakwater axis and the container yard to protect it from the water drive resulting from vessel propellers and potential collisions; iv) improving the support capacity of the soil in the container yard sector close to the breakwater.

11 The maximum crane capacity for the terminal will be 9 gantry cranes with a 30-meter rail gauge in the West Pier and 8 gantry cranes with a 22-meter rail gauge in the" Muelle *de Escala*".

12 The Twenty-Foot Equivalent Unit (TEU) is a measurement unit used in foreign trade to calculate container cargo area.

representatives from the main local stakeholders (Uruguayan Fishing Federation, Recreational Fishers, etc.) and iv) the review, among other environmental Project information, of its E&S Impact Assessment (ESIA)[13] and the related Construction E&S Management Plan [14].

2. Environmental and Social Categorization and Rationale

The Project has been classified as a Category B operation according to IDB Invest´s Environmental and Social Sustainability Policy since the environmental and social impacts, as well as the occupational risks related to the construction and operation phases are deemed of medium-high intensity, are reversible and manageable through management plans and programs known in the sector.

The Performance Standards (PS) triggered by the Project are: i) PS1: Assessment and Management of Environmental and Social Risks and Impacts; ii) PS2: Labor and Working Conditions; iii) PS3: Resource Efficiency and Pollution Prevention; iv) PS4: Community Health and Safety; iv) PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources; and vi) PS8: Cultural Heritage.

3. Environmental and Social Context

3.1 General characteristics of the Project's site

The Project is located in the port area on the south-east end of the Montevideo Bay which houses, among other facilities, the La Teja oil refinery and three private terminals (Terminal Granelera Montevideo, Terminal de Celulosa de UPM and Terminal Cuenca del Plata). The port area also includes the river passenger terminal operated by Buquebus and public piers where tourist cruises, bulk carriers and container vessels operate, under the Montevideo Port berthing regulations. Finally, it should be noted that the Capurro Port, to be used for Uruguayan and foreign fishing vessels, is at the end of its construction stage. The urban area adjacent to the port [15] is located within the so-called Ciudad Vieja (old city), which host trade, administration and financial activities as well as family homes. Some of the main institutional buildings in the area are Club Neptuno (sporting activities, currently under closure), the Mercado del Puerto (major gastronomic center for touristic purposes), Hospital Maciel, building of the old School of Engineering and Architecture (at present, the building is private property and is under closure), Plaza de Deportes No. 1 of the Municipality of Montevideo, the Customs bus terminal and the ANP office building.

3.2 Contextual risks

Some of the main contextual risks are those related to: i) strikes or labor conflicts which could affect the normal development of the Project; ii) climate change; iii) crimes which could occur in the port

[13] Filed by TCP with the environmental authority in October 2022.

[14] Filed by TCP with the environmental authority in December 2022.

[15] Under Municipality of Montevideo Resolution 5384/013, the area adjacent to the Project site is classified as intensive non-housing suburban soil ("SSNHI", in Spanish) earmarked for logistics and industrial activities, inconveniently located in urban soil, owing to its high territorial, landscape and traffic impact.

area, especially during the night or the weekends (physical risks)[16], generally resulting from the frequent access of tourists on vessels; and iv) the potential transmission of diseases by vessel crew members, including new variants of COVID 19 (health risks).

4. Environmental Risks and Impacts and Proposed Mitigation and Compensation Measures

4.1 Assessment and management of environmental and social risks

4.1.a E&S assessment and management system

TCP has an Integrated Environmental, Social, Quality and Health & Safety System (hereinafter, "IMS") in place for the operation of the port terminal, which is certified under the ISO 9001 [17], ISO 14.001 [18] and ISO 45001 [19] standards. .

Through the IMS, TCP will manage the environmental, social, and health and safety risks and impacts related to the Project. Thus, TCP will incorporate into such system the requirements included in the following plans: i) Environmental Management Plan of the Construction approved by the DINACEA; ii) Health and Safety Plan approved by the Ministry of Work and Social Security (MTSS) and iii) the Project's E&S Action Plan.

In order to manage environmental, health and safety (EHS) risks and impacts related to the operation of the port terminal, TCP has a division/area formed by an EHS Leader to whom a full-time occupational hazards technician and a part-time senior advisor report.

TCP's management team is directly in charge of implementing, supervising and monitoring the operating procedures; also, for internal health issues, TCP has an in-company physician to develop a preventive health plan. First aid services are rendered by the ANP, while emergency services are provided by UCM (private mobile coronary unit) in the protected area 24/7.

As to the Project, the main contractor and its subcontractors should have healthcare personnel as required by current legislation (Decree 127/014), which does not establish whether such personnel should be in-company or external, or whether it should be available 24/7. In addition, the ANP has a first aid service with ambulances that operates 24/7.

In order to manage the construction team, TCP has appointed a Project General Manager (the "Project Manager") who will have a team formed by the following professionals: i) an Environmental, Social and Health and Safety Coordinator under the IMS, who will report to the

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16 In accordance with a report prepared by the Regional Security Office of the United States in Uruguay in October 2022, violent crimes (homicides, armed robbery, car theft and robberies and theft in general) occur in all Uruguay and in urban areas both during the day and night. As per such report, criminals usually travel on motorcycles catching their victims unawares with arms and requiring their personal effects; they may act in stores, restaurants, financial centers and small companies.

17 ISO 9001 is one of the standards establishing the minimum requirements for quality management system.

18 ISO 14001 is an internationally accepted standard indicating how to implement an effective environmental management system.

19 ISO 45001 is an internationally accepted standard adopting a proactive approach since it requires that occupational health and safety risks be assessed and corrected before any accidents or injuries take place.

Project Manager, TCP's General Manager (if necessary), the IMS Leader (a position originally created for the operation of the terminal) and will act as technical counterparty to the Project's financing institutions and E&S consultant so that the plans, procedures and programs in the IMS for the Project construction as well as the documented information generated are included in the IMS; ii) a full-time semi-senior Health and Safety professional, who will report to the Environmental, Social and Health and Safety Coordinator of the Project's IMS; iii) a part-time semi-senior Environmental professional to support TCP's Project Manager in supervising and controlling E&S aspects during construction works. The Project's General Manager will be additionally assisted by an external E&S consultant.

TCP will involve the following professionals, who will report directly to the IMS Leader, in the terminal's operation: i) a full-time senior Health and Safety professional to act in the terminal's operation and support TCP's Project Manager during the construction works; ii) a full-time Health and Safety technician to act in the operation of the terminal and support TCP's Project Manager during the construction works; and iii) a full time semi-senior Environmental professional to supervise and control the E&S aspects of the terminal's operation and, if necessary, report on any construction issue that could impact on the operation of the terminal.

4.1.b Policy

TCP has adopted a Quality, Health and Safety, Environmental and Protection Policy to ensure that its activities are carried out sustainably, safely, efficiently and reliably without harming the environment.

However, TCP will prepare and implement an Environmental, Social, and Health and Safety Policy exclusively for the Project which, among other aspects, will: i) be within the framework of its corporate policy; ii) include the Company's E&S values; iii) reassert the Project's intention to meet any applicable local or international standards and EHS specific requirements from the financing institutions; iv) take into consideration non-discrimination principles; and v) ratify the importance of managing climate change and gender risks.

4.1.c Identification of risks and impacts

TCP's current IMS includes identification and assessment matrixes for E&S aspects and occupational hazards related to the activities it performs. This system will be used as framework for TCP to identify and assess any issues or hazards related to the construction works (including dredging) and terminal operations which could be potentially affected by construction works. The criteria whereby these impact and risks will be identified and assessed will include any applicable regulatory requirements and those from the institutions financing the Project.

4.1.c.i Direct and indirect impacts and risks

Some of the main risks and impacts expected during the construction phase of the Project include: i) potential impact on archeological heritage upon removing sediments in the subaquatic area of the

terminal [20] and the Arquímedes bank area; ii) potential impact on navigation in the Port access channel owing to the possible resedimentation of the material from the riverbed removed during the dredging tasks[21] or due to the sand filling [22]; iii) potential structural impact of the Sarandí breakwater due to the sediment dredging tasks and vibrations from subaquatic explosions in the area of the terminal [23]; iv) potential impact on the quality of the water column in the area where dredging sludge is dumped [24]; v) potential impact on vessel traffic during the construction phase in the Montevideo outer harbor [25]; vi) nuisance caused by the vibrations during the subaquatic blasting tasks in the area of the terminal; vii) typical impacts related to the construction works (noise, suspended dust, pollution from spills, temporary impact on traffic, potential increase in road accidents, etc.); viii) temporary impossibility for the public to use the Sarandí breakwater for recreational and fishing activities in its final 250 m during the construction of the combiwall [26] protecting the breakwater and specific sectors during the mitigation works; and ix) potential impact on fishing resources due to explosions in the subaquatic area of the terminal.

Some of the E&S risks and impacts for the operation phase are: i) modification of the coastal landscape from the Sarandí breakwater owing to the visual interference of the increased number of machinery and vessels in the TCP terminal area; ii) potential structural impact of the Sarandí breakwater due to the potential impact and the erosion caused by the water movement from vessel propellers; iii) increase in noise level due to the additional emissions from the new terminal; and iv) potential impact on the water quality at the terminal area due to possible polluting spills and turbidity arising from maintenance dredging.

Some of the main occupational risks of the construction tasks include: i) inhalation of or direct contact with hazardous waste and substances; ii) bangs, cuts or crushing potentially produced by accidents while using vehicles, heavy machinery or dredging vessels; iii) injuries for mishandling of explosives; iv) inhalation of particulate matter (dust or other); v) exposure to excessive noise levels; vi) direct or indirect electric contact; vii) burns (hot works, fires or explosions); viii) exposure to radiation; ix) exposure to excessive cold or heat (with the risk of dehydration); x) falling into the water, especially from dredging vessels. During the operation phase these risks would be of mechanical (falls from different heights, accidents with vehicles, etc.), electrical, toxicological, thermal or acoustic (excessive noise) nature.

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[20] In accordance with the subaquatic studies performed, there is no ship wreckage material underwater in the terminal area and it is possible that small isolated elements partially buried are found. The dredging of the Arquímedes bank, which will be carried out establishing exclusion areas, will be supervised by an archeologist.

[21] Maintenance dredging tasks will be carried out if the bathymetry finds resedimentation.

[22] Process whereby sand is extracted from the riverbed or seabed and pumped to another site to be filled, known as "hydromixture".

[23] As an activity supplementary to dredging, subaquatic explosions will be carried out in 3.5 ha of the terminal area to remove up to 189,000 m^3 of rock from areas adjacent to the piers and the navigation channel. The rocky bottom is expected to be excavated down up to 17 m regarding the chart datum of the Montevideo Port.

[24] Considering the results of the monitoring of the water quality on the Montevideo coast carried out during TCP's opening dredging (Stage II – July 2007) and considering the results of prior studies carried out for the dredging tasks to widen the Port's access channel (July 2015) including the shifting of the mathematical modeling of pollutant dispersion, the conclusion is that in the case of the dredging of the terminal areas, the potential effect regarding water quality will be located in the area close to the discharging zone and it will consequently not impact on the Montevideo coast water quality. According to the EIA, the turbidity generated by the discharge of dredging sludge is not expected to impact ichthyological fauna significantly.

[25] This impact is immaterial as per a specific study (Acrux – Marine Services SRL – January 2022).

[26] Combiwall is a barrier in the water formed by tubular piles and sheet pilings.

4.1.c.ii Analysis of alternatives

Given the nature and objectives of the Project, considered as an expansion of current facilities, the analysis of alternatives was limited to considering different types of construction processes instead of location options for the Project as such.

4.1.c.iii Cumulative impact analysis

TCP has hired a third party to perform a cumulative E&S impact assessment for the Project as per IDB Invest's Practical Guide for Cumulative Impact Assessment in Latin America and the Caribbean[27].

4.1.c.iv Gender risks

There is a significant gender gap in Latin America and the Caribbean; it is defined as differential, unequal access to work, education, economic and political participation opportunities based on sex or gender. This gap is supported by widespread cultural rules for what is acceptable for men and women, and is exacerbated by weak legal safeguards or inadequate social response. The gender gap leads to gender-based discrimination, unequal access to public services, to educational differences, to work and pay gaps and lower rates of political participation.

The gender gap index for Uruguay (0.71) is equal to that of other four countries in the region[28]. Gender-based violence and harassment (GBVH) are also a major problem in Latin America and the Caribbean, which accounts for the highest rate worldwide. A total of 19 femicides were reported in Uruguay in 2020, being this figure the second smallest among 18 countries in the region[29].

Seeking to prevent all forms of harassment at the workplace, TCP drafted the "Prevention of Harassment at the Workplace" manual which includes specific instructions to address the issue establishing channels for reporting, investigating and communicating the conclusions as well as a list of potential penalties applicable to any person failing to observe these rules[30]. However, as part of its IMS, TCP will prepare and implement a specific procedure to manage labor harassment prevention during the Project. This procedure will be compulsory for its own personnel as well as its contractors' and subcontractors' staff.

4.1.c.v Climate change exposure

The Project exposure to climate change risks is deemed: i) high regarding sea level increase; ii) low regarding scarcity of drinking water; and iii) moderate regarding the effects of draughts (which would take place at the end of the 21st century under a high emission scenario). TCP's exposure to the financial risk of the transition process to practices entailing less generation of carbon is considered low.

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27 https://www.idbinvest.org/en/download/19140

28 The gender gap index considers the following aspects: i) economic participation and opportunity; ii) educational attainment; iii) health and survival; iv) political empowerment. https://www.statista.com/statistics/803494/latin-america-gender-gap-index-country/

29 https://www.statista.com/statistics/827170/number-femicide-victims-latin-america-by-country/

30 In compliance with Law No. 19,849, which is aligned with International Labour Organization Convention 190 on violence and harassment.

4.1.d Management programs

The plans, programs and procedures in TCP's IMS include the management of the identified risks and impacts by applying identification and monitoring matrixes.

The use of the management tools in the IMS will ensure that the Project meets the EHS requirements under the applicable regulations and legal provisions and the loan agreements to be entered into with the financing entities. To facilitate the above, TCP will assess the need to amend plans, programs and procedures in the IMS to attain: i) adequate EHS management in the terminal's operations considering that some of them could be impacted by the construction works; ii) the incorporation into the system of the actions indicated in the Construction E&S Management Plan, the Health and Safety Plan and Environmental and Social Action Plan of the Project, as well as the actions associated to complying with EHS requirements from the financing entities; and iii) the supervision, assessment and control of the EHS management systems of the contractor and subcontractors ensuring that they are aligned with the Environmental Social and Health and Safety Policy of TCP especially drafted for the Project.

4.1.e Organizational capacity and competency

TCP personalizes the training modalities (courses, workshops, etc.) to suit the demands (content, number of participants, etc.).

Biannual EHS training plans will be prepared for the Project by virtue of its nature and the general characteristics of the personnel related to construction activities; such plans will include the following issues: i) contents of the Construction E&S Management Plan; ii) contents of the Health and Safety Plan of the Project; iii) safety in the driving of vehicles and machinery inside and out of the work fronts to the personnel defined by the Project Manager jointly with the safety heads; and iv) if necessary, issues related to the E&S provisions from the agencies financing the Project.

4.1.f Emergency preparedness and response

TCP's current EHS management includes an Emergency Plan and emergency procedures designed for the terminal's operational realm. TCP performs fire drills and others related to situations in which the terminal safety could be under threat (required by the ISPS Code); likewise, as provided for in such Code, TCP participates in large-scale drills organized by the ANP and under the supervision of the National Coast Guard covering all the Montevideo Port.

However, TCP will prepare and implement an Emergency and Preparedness Response Plan exclusively designed for the Project's land facilities making sure that it is consistent with the Emergency Plan in place for the operational area. In addition, TCP will review and validate the emergency plans of the main contractor and its subcontractors (including the plans applicable to the aquatic area) in order to ensure its alignment and coordination with the prevention and emergency plans in the IMS.

4.1.g Accident management

Although TCP's health and safety management strategy includes procedures to ensure that the legal requirements to prevent and manage the occurrence of occupational accidents are complied with, the IMS does not set forth a specific procedure to manage all the aspects related the occurrence of accidents.

TCP will thus prepare and implement a specific accident management procedure applicable to the Project and compulsory for Project employees and hired personnel; the contents shall: i) ensure that the legal requirements included in the Health and Safety Plan are met; ii) identify the responsibilities and actions to be immediately carried out once the accident has taken place; iii) include instructions to report the accident, record its nature and magnitude, and any formalities related to basic legal aspects; iv) include the formats to prepare accident investigation reports; and vi) include the formats to identify and implement the preventive or corrective measures to be adopted in order to prevent the accident from happening again.

4.1.h Monitoring and review

The implementation of the Project's Construction E&S Management Plan and the Health and Safety Plan will be controlled by the DINACEA and the General Inspectorate of Labor and Social Security Agency of the MTSS.

The Construction E&S Management Plan details the monitoring frequency and location of the sampling points for: i) water quality: in five points in the Montevideo Bay; ii) environmental noise levels: in six points at the port promenade and close to the TCP terminal; iii) quality of the water and sediments: in five beaches close to the Project (Cerro, Ramírez, Pocitos, Playa Verde and Carrasco); iv) vibrations from subaquatic blasting tasks: in three points (north west corner of the present pier, old Hotel Nacional building and Sarandí breakwater); v) structural monitoring of the Sarandí breakwater: land survey in all the breakwater; vi) archeological supervision of the works: terminal area such as Arquímedes bank; and vii) bathymetric controls in dredging areas: several points based on the results of surveys performed before, during and after the dredging tasks. Monitoring campaigns will be carried out by outsourced specialized companies.

The Project's Health and Safety Plan [31] will include: i) a health and safety monitoring plan at work places (noise, lighting, air quality, etc.); ii) a breakdown of the labor rates to be monitored and reported (accidents, occupational diseases, etc.); iii) the mode and a detail of the health check-ups to be required; iv) the requirements and frequency of inspections at the work sites to verify their health and safety conditions; and v) details of the equipment of safety elements and the use of the PPE necessary at the work sites.

TCP will also prepare and implement an Environmental, Social, and Health and Safety Monitoring Plan for the Project, which will include monitoring the parameters in the Construction E&S

[31] The final version of the Project's Health and Safety Plan is currently being drafted.

Management Plan, the Health and Safety Plan of the Project and the E&S Management Plan 32; it will also ensure that the parameter caps included in the plan are not over the values acceptable under current legislation and the General EHS Guidelines[33].

4.1.i Stakeholder engagement

The Construction E&S Management Plan includes the Stakeholder Engagement Plan, which covers the following phases: i) dissemination of information through disclosure mechanisms adapted to the particularities of each stakeholder; ii) implementation of the Active Communication Plan, promoting the dialogue with and engagement of citizens; iii) creation of community Engagement Instances, mechanisms for community engagement by submitting concerns and proposals; and iv) adoption of grievance and claims mechanisms for the community and the workers. TCP will integrate the Stakeholder Engagement Plan into the IMS making sure that the supervision responsibilities and record formats have been adequately established.

4.1.i.i Disclosure of Information

The first stage of the disclosure and consultation process was carried out following the guidelines established in the first component of the Stakeholder Engagement Plan (information disclosure stage). In this sense, TCP engaged in the following activities[34]: i) presentation of the Project to the stakeholders identified previously; and ii) interviews to different stakeholders (port authorities, port operators, foreign trade players, political authorities, representatives from the transportation sector and from the sports, social and educational sectors in the area of direct influence of the Project).

For the construction phase, TCP expects to continue disclosing information on the Project by distributing printed material and using the mass media (e-mail, mobile phone applications, web site, etc.).

4.1.i.ii Informed consultation & participation

The second engagement and consultation stage was carried out by TCP implementing the Active Communication Plan in order to gather stakeholder feedback on the measures proposed to manage the impacts generated by the Project and, if incorporated, when relevant, into its design and management. Thus, TCP organized group meetings with the stakeholders in the direct area of influence of the Project through workshops. The results of this process are disclosed in the Significant Consultation Report of December 2022.

The phase Engagement Instances of the Stakeholder Engagement Plan sets forth mechanisms enabling stakeholder engagement during the construction phase through: i) informative events

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[32] The Environmental and Social Action Plan (ESAP) is the document prepared to close TCP's compliance gaps with the policies or requirements of the Project's financing agencies. The ESAP should not be mistaken with the Construction E&S Management Plan, prepared by TCP to meet current legal regulations.

[33] https://www.ifc.org/wps/wcm/connect/eb6fddc1-a3e3-4be5-a3da-bc3e0e919b6e/General%2BEHS%2B-%2BSpanish%2B-%2BFinal%2Brev%2Bcc.pdf?MOD=AJPERES&CVID=nPtgG1l

[34] The results of this process were included in the chapter “Social Perception” of the ESIA (Annex VI – December 2021).

aimed at providing information on the progress of the Project construction; and ii) active visits to the area by TCP's social team to respond to inquiries, disclose Project information and clarify any issue that may arise.

Once the ESIA has been approved and published in the Summary Environmental Report, the DINACEA will launch the Project's public consultation as provided for in the effective legislation.

4.1.i.iii Indigenous peoples

The Project will not affect any indigenous population.

4.1.i.iv Private sector responsibilities under a government-led stakeholder engagement process

TCP keeps permanent contact with community representative groups. The responsibility for the stakeholder engagement process during the works will be directly assumed by the Project's General Management.

4.1.i.v Community grievance mechanism

TCP has in place an instruction manual to manage community grievances and concerns. However, such manual requires that the reception channels, resolution terms, responsibilities and record formats be more clearly specified. Thus, in order to systematize stakeholder Project-related grievance and claims reception and management and to ensure the involvement of the stakeholders, TCP, as an integral part of its IMS, will prepare and implement an anonymous specific third-party grievance and claim procedure including the possibility of capturing grievances and claims, establishing the parties in charge of its management and determining the assessment and response terms. The procedure will clearly establish the assignment of responsibilities for TCP's personnel and each contractor, as well as those related to recording formats.

4.1.i.vi Provisions for addressing vulnerable groups' grievances

Although the Project will not directly affect vulnerable groups, the third-party grievance and claim reception and resolution procedure will establish mechanisms to ensure that the grievances from vulnerable groups are captured and treated adequately.

4.1.i.vii Ongoing reporting to affected communities

The personnel of TCP and the hired companies will prepare reports for the affected communities to ensure that community engagement is adequate.

4.2 Labor and Working Conditions

4.2.a Working conditions and management of worker relationships

At present, the personnel involved in the Port terminal operations is formed by 478 workers (including operation and administration). The construction works will demand a maximum of about 500 workers who will mostly come from the Montevideo metropolitan area.

4.2.a.i Human resources policies and procedures

TCP will implement and draft a Human Resources Policy for the Project; such policy will be applicable to its own personnel and hired personnel, and will be aligned with the legal requirements and standards required by the Project financing entities.

4.2.a.ii Working conditions, terms of employment and labor organizations

The general health, safety and welfare conditions of the work places and camp housing facilities are set forth in Construction Health and Safety Decree No. 125/014. TCP's health and safety management tools are deemed adequate and sufficient to provide a service that is consistent with current legislation.

By virtue of the effective legislation (Decree No. 283/96), contractors should submit to the MTSS the health and safety studies which will identify and assess the health and safety risks of the construction works, the methodology to manage them and the assignment of responsibilities.

In accordance with current regulations, TCP respects its workers' right to form unions or join existing ones. In this sense, its workers may choose to enroll or not to the different unions related to the activities to be carried out during the course of the Project.

In compliance with legislation (Decree No. 291/07), the representatives of the workers and TCP meet monthly as a bipartite committee to analyze working conditions, any risks detected or any other aspect subject to observation or inquiry by the workers. Labor conditions are governed by the laws, the specific collective bargaining agreements for each type of activity. Compensation and other benefits are established by the Salary Council of each sector [35].

4.2.a.iii Non-discrimination and equal opportunity

TCP's Human Resources Policy to be drafted for the Project will state the Company's commitment to non-discrimination and equal opportunity for all its personnel, and any contracted or subcontracted personnel.

[35] Salary Councils are formed by three parties (representatives from the government, the employers and the workers), were created by Law No. 10,449 and establish minimum salaries per work category through the discussion among the parties.

4.2.a.iv Retrenchment

In Uruguay, there are provisions in place for retrenchment in large projects in the construction industry and they establish criteria to do so. Before the end of the construction phase, TCP will require that the contractor analyze the retrenchment alternatives and develop and implement a personnel demobilization plan that meets all the related legal and contractual requirements and mitigates any adverse impacts which may arise from worker dismissals.

4.2.a.v Grievance mechanism

TCP will prepare and implement a specific procedure to receive and resolve grievances and claims from its payroll and contracted and subcontracted workers which also includes the possibility of receiving anonymous grievances or claims, and guarantees non-retaliation. Such procedure will clearly establish the assignment of responsibilities of each employee, as well as the deadlines for assessment of and response to personnel statements.

4.2.b Protecting the workforce. Child labor. Forced labor.

TCP adheres to and complies with Uruguayan legislation, which: i) establishes the minimum working age at 18 years old; ii) prohibits child labor and forced labor following the ILO's guidelines; and iii) requires that all the workers get workers' compensation insurance and a healthcare plan for them and their families.

4.2.c Occupational health and safety

Uruguayan legislation establishes that those engaging in construction works should submit to the General Inspectorate of Labor and Social Security of the MTSS a health and safety study signed by an architect or engineer for the different stages of the works, as well as a health and safety plan signed by the prevention technician stating the prevention measures for the risks detailed in the abovementioned study including the welfare conditions of the workers. Consequently, the construction companies will have a team of prevention technicians in charge of applying the related Health and Safety Plan at each construction site.
The health and safety conditions of the personnel of the main contractor and its subcontractors will be supervised and monitored, in principle, by personnel appointed by the main contractor and its subcontractors. TCP will engage in supplementary supervisions.

TCP will make sure that all significant risks detected in the health and safety identification and assessment matrixes are managed adequately through a specific procedure.

In compliance with local legislation, the contractors of the construction works will have an in-house occupational safety service incorporated into the Company's structure; its members will be determined on the basis of the tasks to be performed and the number of workers. The contractors' and subcontractors' workers will choose at least one Health and Safety delegate at the work site to represent them, who will focus on collaborating with the main contractor's Health and Safety

Service promoting personnel awareness, cooperating in risk identification, inspections and recording any suggestions or comments that they may deem appropriate in the Work Site Book [36].

In Uruguay, Banco de Seguros del Estado (BSE) is the workers' compensation insurance provider. In this sense, all occupational accidents occurring while performing Project-related tasks should be reported to BSE by the Company and the worker should be transferred to BSE's hospital for care. On the other hand, the employer is criminally liable if their company fails to adopt any prevention measures to safeguard life from grave danger, the physical integrity and health of the workers. The penalty to be imposed on such person is from 3 to 24 months in prison.

TCP will make sure that the main contractor's and its subcontractors' working conditions meet the legal requirements and the provisions included in the policies of the Project's financing entities.

4.2.d Provisions for people with disabilities

TCP will make sure that work places as well as sanitary and mobility facilities are suitable for persons with some degree of disability, whether they are employees or visitors. The emergency plans will be updated accordingly to include this group of people in the evacuation plans.

4.2.e Supply chain

All the inputs and materials used in developing the Project will be provided by formal established national or foreign companies, thus minimizing the labor risks inherent to the supply chain.

4.3 Resource Efficiency and Pollution Prevention

4.3.a Resource efficiency

In order to improve the sustainability of its operations, TCP has developed a work plan for 2025 which includes obtaining the ISO 50001 energy management certification. Moreover, it has signed an agreement with the Uruguayan government to install wind generators, the location of which is still to be defined. This will allow the expected increase in electric power consumption (the Project will provide electric power to the vessels docked at the Port) to be partially covered by a clean energy source.

4.3.a.i Greenhouse gases

The main sources of greenhouse gas (GHG) generated by TCP are the combustion engines from the machinery used at the piers and container yard (cranes, machinery to move and stack containers, power generators, trucks [37] and other vehicles). Over the short- and medium-term, TCP plans to increase the use of electric vehicles and machinery.

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[36] The Work Site Book is the log recording the daily events at the work front.

[37] During the operation, the average flow of trucks is estimated at 600 units per day. For the construction phase, an additional flow of 24 trucks per day is expected (source: TCP EIA – Vol. II).

Although the GHG emissions are considered relatively low, at each calendar year-end, TCP will calculate the emissions for the prior year and will estimate those to be generated over the following year.

4.3.a.ii Water and power consumption

The total mains water consumed by TCP in 2021 for the operation tasks was 1,887 m^3, 50% less than in 2020. Electric power consumption for the same year was 11,790,527 KWh, with an increase of about 60% as compared to the prior year. Diesel fuel consumption during 2021 was 1,699,305 liters, representing a 26% increase as compared to 2020.

For the Project, TCP will record the monthly consumption of water and energy (UTE network and works generators) and will prepare and implement a program to optimize the use of water and energy, which will include objectives, terms and assignment of responsibilities.

4.3.b Pollution prevention

In order to control pollution during its operations, TCP has: i) a washing area for IMO cargo containers and containers polluted by hazardous substance spills [38]; ii) a wastewater treatment plant, which discharges into the sewers (as long as the physical and chemical analysis of the effluent treated indicates that it is safe to do so); and iii) a treatment plant with a sludge and oil separator from the wastewater generated by machinery washing.

Liquid domestic effluents and treated effluents are dumped in the municipal wastewater collector; its physical and chemical quality is analyzed on a monthly basis.

The Construction E&S Management Plan includes measures to manage waste from the civil works (debris, leftover materials, metal scrap, wood, etc.), domestic-type waste and workshop hazardous waste (oils, filters, used batteries, etc.), including the waste generated by the vessels. Considering the nature of each type of waste, its separation at source, registration, temporary storage, transportation and treatment, and final disposal by authorized companies is foreseen. However, in order to systematize the Project's solid waste management, TCP will prepare and implement a specific waste (generated on the land or in the water) management procedure under the IMS incorporating the measures set forth in the Construction E&S Management Plan and those recommended internationally.

The Construction E&S Management Plan includes provisions to handle the following polluted liquid effluents before being dumped into a collector or water body: i) domestic waste (portable toilets and cesspools); ii) waste from cleaning the facilities, tools and machinery used to prepare concrete (locally treated with pH correction before being dumped); iii) waste generated from washing machinery (treated with an oil-grease separating chamber before being dumped); and iv) oily bilge water,

[38] TCP's consulting body regarding hazardous materials to resolve cases not considered in the legislation is the Permanent Commission of Hazardous Merchandise of the ANP formed by technical delegates appointed by the Uruguayan Coast Guard, the Navigation Center (which includes most maritime agencies and port operators) and the ANP.

household wastewater and toilet wastewater from dredging vessels [39]. However, in order to systematize the Project's liquid effluents management, TCP will prepare and implement a specific liquid effluent management procedure under the IMS incorporating the measures set forth in the Construction E&S Management Plan and those recommended internationally.

4.3.b.i Hazardous materials management

For the TCP terminal construction and operation phases, the water transportation of hazardous merchandise is governed by the International Maritime Dangerous Goods (IMDG) Code [40]. For the operation of the terminal, TCP has documented procedures to manage dangerous merchandise and treat the effluents generated when cleaning the containers that could have been polluted by such substances.

To systematize the adequate management of the hazardous substances handled in construction, TCP will prepare a specific procedure under the IMS to manage hazardous substances; such procedure shall be mandatory for the main contractor and the subcontracted companies.

4.3.b.ii Pesticides Use and Management

For plague (mainly pigeons, walking insects and rodents) management purposes, TCP executes a Plague Control Program. However, to make sure that the control is in line with the specifications for the protection of each type of stored product and that it meets local standards and the best international practices, TCP will prepare a specific plague control procedure applicable in both the operations and the construction phases of the Project. This procedure will prevent TCP and the contractors and subcontractors from purchasing, storing or using the products included in classes Ia (extremely hazardous) or Ib (highly hazardous) as per the World health Organization (WHO) classification of pesticides based on how hazardous they are.

4.4 Community Health, Safety and Security

4.4.a Community health and safety

To measure the potential impact the Project activities can cause on the community health in terms of noise and the potential pollution of public-use water, TCP is expected to monitor the noise levels at two points located at strategic sites of the terminal every quarter. Likewise, TCP will monitor the quality of the sediments and water at the beaches of Montevideo (Cerro, Ramírez, Pocitos, Playa Verde and Carrasco) with weekly tests to detect, among other parameters, heavy metal levels (cadmium, mercury, lead, chromium and granulometry) both in the water and sediments, and pH, conductivity, dissolved oxygen and suspended material in the water.

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[39] The discharge and treatment of oily bilge water from vessels requires the service from the Maritime Agency and the involvement of the Health Protection and Supply Unit (USAB, en Spanish), the treatment in oxidation tanks authorized by the DINACEA and the Municipality of Montevideo. The discharge of household wastewater and toilet wastewater requires the intervention of the Maritime and River Health Division of the Ministry of Public Health, the USAB and companies authorized to transport them (sewage truck companies) and treatment or disposal.

[40] The IMDG Code is a publication of the IMO compiling all the provisions to be used to regulate hazardous material water transportation.

The generation of dust related to the terminal construction works will be mitigated by periodically spraying water on the surface of the roads to be used by trucks and heavy machinery.

It is estimated that the truck flow from and to the terminal during the construction phase will be 24 units per day consistently distributed. In view of the potential traffic jams caused by the above, TCP, jointly with competent authorities, will establish preventive measures (installation of signs, traffic lights, etc.) to arrange the flow of vehicles and pedestrians in the works area.

To ensure the adequate management of the risks associated to the trucks and light vehicles of the Project, TCP will prepare and implement a Road Safety Plan applicable to all the construction areas and compulsory for own and outsourced personnel. Such plan will include the following: i) compulsory defensive driving courses for the personnel to be defined by the Project Manager jointly with the persons in charge of safety; ii) random alcohol and drug screening tests to truck and owned or rented machinery drivers; iii) identification of sensitive sites along the routes of trucks and owned or hired light vehicles personnel (e.g., schools, hospitals and tourist sites with large concentrations of public) establishing specific driving guidelines in certain places (such as maximum speeds in certain stretches); iv) good behavior standards when dealing with members of the community; and v) coordination activities with local authorities and road police (to implement detours and the increase in road safety at night or in the event of bad weather conditions).

4.4.a.i Infrastructure and equipment design and safety

The Sarandí breakwater is considered by the inhabitants of Montevideo as a viewpoint of the coast landscape and a gathering, recreational and sports fishing site. Therefore, the Project will routinely monitor its structural stability (which would be altered by the construction of the West Pier) by performing land surveys during the construction period.

4.4.a.ii Hazardous materials management and safety

By implementing the specific procedures in the IMS, TCP will prevent or minimize the effects arising from potential polluting spills which could impact on recreational or fishing activities carried out close to the terminal.

4.4.a.iii Ecosystem services

The provisions and mitigation measures included in the Construction E&S Management Plan related to managing the Project's impacts on water quality and ichthyofauna will allow for adequately preventing the effects on recreational and sports fishing activities in the areas close to the construction sites.

4.4.a.iv Community exposure to disease

Construction activities are not expected to increase the exposure of the local population to foreign transmissible diseases or of any other type, considering that: i) the Port is an existing infrastructure; ii) most of the workers will be from the City of Montevideo and its surroundings; and iii) all the

personnel will be subject to preoccupational tests and will be under medical surveillance while involved in the Project within the framework of Decree No. 127/014.

4.4.a.v Emergency preparedness and response

The Emergency Preparedness and Response Plan of TCP's integrated IMS will incorporate measures to manage the most probable emergency situations that could arise from the Project (mass pollution, fires, major explosions). In addition to the drills to be organized by the Company, it is expected that, as set forth in the ISPS Code and the International Convention for the Safety of Life at Sea (SOLAS), TCP will perform emergency preparedness exercises supported by the Department of Montevideo and the Port Facilities Protection Officers (OPIP, in Spanish) of the ANP, as well as the Head of the Coast Guard at the Montevideo Port.

4.4.b Security personnel

The security personnel at TCP's terminal are unarmed; they are on the payroll of the companies hired specifically to render security services and have been trained in the adequate use of force and respect for human rights.

4.5 Land Acquisition and Involuntary Resettlement

The Project will not give rise to any involuntary resettlement either physical or economic of any kind.

4.6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

4.6.a General

The Project will not give rise to any significant changes entailing the conversion or degradation of critical habitats [41] or protected areas.

4.6.b Protection and conservation of biodiversity

The subaquatic blasts to be carried out to remove a part of the rocky bed in the terminal area will undoubtedly produce overpressure which could affect the local ichthyofauna. The following measures, among others, will be taken to minimize them: i) visually inspect the area to verify there are no sea mammals before a blast; ii) executing a light detonation before the main detonation to frighten off the ichthyofauna that could be present close to the area of intervention; and iii) generating a bubble curtain if more than 20 dead fish are found after the light detonation.

The Project's ESIA has determined that, during the construction, no management measures will be required at the terminal and Arquímedes bank area (both being modified habitats) since the

[41] Critical habitats are high-value biodiversity areas such as: i) habitats that are significantly important for the survival of endangered or critically endangered species; ii) habitats that are significantly important for the survival of endemic species or species restricted to certain areas; iii) habitats supporting the survival of significant concentrations at a global level of migratory species or species gathering there; iv) unique or highly threatened ecosystems; or v) areas related to key evolutionary processes (PS6 – January 2012).

potential impact of the aquatic biodiversity will not be significant [42]. The study also determined an immaterial impact on spawning grounds, and areas of growing and reproduction of ground fish and nektonic species in the authorized sludge discharge area (Zone B, adjacent to the Port access channel located 40 km south east). For the operation phase, the probability of the marine fauna being affected due to maintenance dredging tasks at TCP's new terminal and to the disposal of dredging material at the dumping area will be low; consequently, it will not be necessary to incorporate specific management measures.

4.6.b.i Modified habitat

In general terms, the Project's aquatic construction activities will be carried out in areas previously intervened (modified habitats) by similar projects (including the previous expansion stages of the TCP terminal) in which dredging and sediment removal techniques similar to those proposed for the Project have already been used.

4.6.b.ii Natural habitat

The Project will be carried out in previously intervened areas.

4.6.b.iii Critical habitat

The Project does not intersect any critical habitat areas.

4.6.b.iv Legally protected areas and internationally recognized areas

The Project does not affect any areas protected by the National Aquatic Resources Office (DINARA, in Spanish). One of the areas protected by the National Protected Areas System (SNAP, in Spanish) closer to the Project is the Flores Island (25 km east of the Montevideo Port). TCP has verified that the potential water quality change as a result of the discharge of sludge at the dumping site will not affect the quality of the water surrounding the island significantly.

4.6.b.v Invasive alien species

The exotic species present in coastal-marine ecosystems in Uruguay are mostly found in the Río de la Plata (intertidal and subtidal area) and at the mouth of streams and rivers (subestuaries of the Río de la Plata) [43]. Vertebrates were introduced mainly for fishing and aquaculture, while

[42] The ESIA considered the following potential impacts on biodiversity: I) impact on benthic fauna due to sediment removal in the terminal area; ii) impact on the ichthyofauna due to the resuspension of sediments in the terminal area; iii) impact on benthic fauna due to the disposal of dredging material in the dumping area; and iv) impact on benthic fauna due to the removal of sediments in the exploitation area at the Arquímedes bank.

[43] "Especies exóticas invasoras de Uruguay: Distribución, impactos socioambientales y estrategias de gestión" (Exotic invasive species of Uruguay: distribution, environmental and social impacts, and management strategies). Exotic Invasive Species Committee – December 2021.

invertebrates entered mostly incidentally in ballast water or through vessel fouling [44]. Although the Project will cause a significant increase in traffic of vessels arriving at the Montevideo Port, this will not necessarily imply an increase in invasive exotic species introduction since the management of the ballast water from the vessels is regulated and supervised by the Uruguayan Coast Guard in its capacity as maritime authority [45].

4.6.c Management of ecosystem services

Although the impacts expected to affect ecosystem services are considered low or nonexistent, the Construction E&S Management Plan of the ESIA sets forth actions to prevent and mitigate all the impacts on ecosystem services from a cultural nature (recreation, sports fishing, etc.) and from support (biodiversity maintenance services, among others) that could be generated by the Project.

4.6.d Sustainable management of living natural resources Supply chain

The Project will not need any living natural resources.

4.7 Cultural Heritage

4.7.a Protection of cultural heritage in project design and execution

The Project will not affect any critical cultural heritage [46]. However, during the construction phase, TCP will perform archeological control tasks at the works, especially during the dredging to identify and manage any chance finds. In this sense, it will: i) establish an effective surveillance system on sediment removal tasks; ii) implement a systematic recovery procedure of the largest number possible of archeological elements found in the sediment and the dredged surface; and iii) guarantee that all the process is correctly documented and that each recovered element is traceable.

To prevent the subaquatic blasts from generating undesired impacts on the Sarandí breakwater and heritage buildings in the Ciudad Vieja, TCP will adjust explosive charges and will install, at least one week before the beginning of the blasts and to establish a vibration intensity baseline, three permanent seismographs capable of monitoring vibrations in three dimensions (on the north-west corner of the *Muelle de Escala*, at the building of the old Hotel Nacional, and at the crossing of the Sarandí breakwater and the new pier extension).

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[44] Some of the invasive exotic species identified in the Río de la Plata and its subestuaries include: *Ligia exótica* (isopods), *Amphibalanus Amphitrite* (stripped barnacle), *Corbicula Fluminea* (Asian clam), *Corbicula Largillierti* (Asian clam), *Limnoperna Fortunei* (Golden mussel), *Rapana Venosa* (veined rapa whelk), *Ficopomatus Enigmaticus* (Australian tubeworm) and *Cyprinus Carpio* (common carp).

[45] "Directrices para el control y la gestión de agua de lastre de los buques" (Guidelines for the control and management of ballast water from vessels) – Maritime Provision No. 109 – Coast Guard – Uruguay.

[46] The critical cultural heritage is of one or both of the following types: i) heritage that is internationally recognized from communities using or having a living memory of having used the cultural heritage for cultural purposes for many years; or ii) cultural heritage areas that are legally protected, including those proposed as such by the host governments.

4.7.a.i Chance find procedures

The Construction E&S Management Plan provides that it is highly probable that old domed structures will be found in the land area during the construction of the foundations of the new maintenance workshops. For these cases, the Plan sets forth that if a find occurs it should be documented, the intervention should be minimized, and the instructions of the Project archeologist should be followed. As to the aquatic area, the plan establishes the following in the event of archeological finds: i) recording the geographical coordinates of the find; ii) if possible, marking the find site with a buoy; iii) establishing an 5 m exclusion zone around the find; iv) suspending any intervention in that area; v) drafting a search report including the shape, dimensions and material, origin hypotheses and functionality; vi) obtaining a photographic record, and classifying and dealing with the find accordingly; and vii) immediately notifying TCP and the Port authorities.

According to TCP's chance find procedure, any archeological or cultural find should be assessed by archeologists and, when appropriate, the event should be reported to the ANP, the Cultural Heritage Commission of the Ministry of Education and the National Environmental Quality and Assessment Office of the Ministry of the Environment. The elements that are recovered and have potential archeological importance should be: i) set aside, depending on the material (ceramic, glass, metals, etc.) they are made of; or ii) labeled (with an inventory number ensuring their traceability), cleaned (with due care), documented, drawn or photographed, and included in the inventory before being stored provisionally in plastic containers full of sea water and located provisionally in polypropylene string bags securing water circulation.

4.7.a.ii Critical cultural heritage

The Project is not expected to affect any critical cultural heritage.

4.7.b Project's use of cultural heritage

The Project will not use any material resulting from a chance find.

5. Local Access of Project Documentation

The Project documentation may be accessed by writing to:

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