

ÁGUAS DE MANAUS PROJECT - BRAZIL
Environmental and Social Action Plan (ESAP)

No.	Aspect	Action	Product/Deliverable	Completion date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Environmental Permits	1. Submit valid environmental licenses for all assets which so require, including: i) prior licenses; ii) installation licenses; iii) operating licenses; iv) other types of environmental licenses; v) surface water catchment permits; vi) groundwater catchment permits; vii) effluent discharge permits; and viii) authorizations for vegetation suppression.	1. Table with asset licenses and their validity.	1. Before the 1st disbursement.
		2. Prepare integrated reports about compliance with the requirements of environmental licenses, water abstraction permits, effluent disposal permits, and authorizations for vegetation suppression.	2. Integrated reports on environmental licensing.	2. In the Environmental and Social Compliance Report (ESCR).
1.2	Policy	1. Draft an Integrated Environmental, Social and Health and Safety Policy specific to the Project that includes social commitments.	1. Integrated Policy.	1. Before the 1st disbursement.
		2. Disseminate the Integrated Policy.	2. Evidence of dissemination.	2. Three months after the 1st disbursement.
1.3	Impact Identification	1. Review spreadsheets identifying environmental aspects and impacts to identify, for each asset, future social, health and safety risks and impacts.	1. Spreadsheets reviewed as indicated.	1. Before the 1st disbursement.
1.4	Management Programs	1. Develop a Plan for Prevention and Mitigation of Social Risks and Impacts.	1. Plan for Prevention and Mitigation of Social Risks and Impacts.	1. Three months after the 1st disbursement.
		2. Implement Plans for Prevention and Mitigation of Social Risks and Impacts.	2. Evidence of implementation.	2. In the ESCR.
		3. Prepare a Preliminary Alternatives Assessment Procedure to implement before deciding to locate new assets, aiming to avoid or minimize possible impacts of involuntary resettlement, economic displacement, biodiversity, or cultural heritage.	3. Preliminary Alternatives Assessment Procedure.	3. Before the 1st disbursement.
		4. Implement the Preliminary Alternatives Assessment Procedure.	4. Evidence of implementation.	4. In the ESCR.
		5. Prepare a Climate Change Risk and Impact Management Program, focusing on predicting, ordering, and adapting sanitation infrastructure.	5. Climate Change Risk and Impact Management Program.	5. One year after the 1st disbursement.
		6. Implement the Climate Change Risk and Impact Management Program.	6. Evidence of implementation.	6. In the ESCR.
		7. Prepare a Damages Survey and Compensation Procedure for Communities Affected by Emergencies.	7. Damages Survey and Compensation Procedure for Communities Affected by Emergencies.	7. Before the 1st disbursement.
		8. Implement a Damage Survey and Compensation Procedure for Communities Affected by Emergencies.	8. Evidence of implementation.	8. In the ESCR, when applicable.
1.5	Stakeholder Engagement	1. Prepare a report on the operation of the grievance channel, identifying complaints presented by third parties, classified by type, complaint handling, response given to complainants and other measures adopted.	1. Report on the grievance channel.	1. In the ESCR.
		2. Prepare Semiannual Reports on engagement and social responsibility activities with external stakeholders.	2. Semiannual Reports on engagement and social responsibility activities with external stakeholders.	2. Six months after the 1st disbursement, and then in the ESCR.
1.6	Emergencies	3. Submit a report describing the emergencies, including: i) the report of each emergency; ii) internal and external communication procedures and the stakeholders involved; iii) analysis of response times; iv) the performance of response teams; v) a summary of media reports; vi) the composition and training actions of emergency teams; vii) a summary of the drills including potentially affected communities, if any; and viii) a review and improvement of Emergency Action Plans (ERP).	3. Report on emergencies.	3. In the ESCR.
1.7	Monitoring	1. Submit audit reports on the <i>Interage</i> Program, identifying non-conformities,	1. Audit reports on the <i>Interage</i> Program.	1. In the ESCR.

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		improvement actions and performance in the environmental, social, and health and safety areas.		
		2. Submit reports on inspections and checklists of construction fronts covering environmental, social, and health and safety aspects.	2. Reports on inspections and checklists.	2. In the ESCR.
PS 2: Labor and Working Conditions				
2.1	Human Resources Policy	1. Develop a specific Human Resources Policy for the Project that consolidates information on working hours, wages and salaries, overtime, compensation and benefits, health care, education-related benefits, support for collaborators who are mothers, the right to freedom of association, among others.	1. Human Resources Policy.	1. 2 months after the 1st disbursement.
		2. Disseminate the Human Resources Policy to all employees (insourced and outsourced).	2. Evidence of dissemination.	2. 4 months after the 1st disbursement.
		3. Incorporate the Human Resources Policy into employee integration training.	3. Registration of Integration activities.	3. In the ESCR.
2.2	Grievance Mechanism	1. Develop an internal Complaint and Grievance Mechanism: i) available to employees and outsourced workers; ii) ensuring confidentiality and no retaliation against the complainant; iii) collecting anonymous complaints; and iv) establishing an internal procedure for receiving, recording, and responding to complaints.	1. Complaints and Grievance Mechanism Procedure Manual.	1. 2 months after the 1st disbursement.
		2. Communicate the internal Complaint and Grievance Mechanism to employees and outsourced workers.	2. Evidence of dissemination.	2. 4 months after the 11st disbursement.
		3. Implement the Complaint and Grievance Mechanism.	1. Evidence of implementation of the Complaint and Grievance Mechanism presenting complaint records and respective responses.	3. In the ESCR.
2.3	Health and safety	1. Submit an integrated report on health and safety, containing: i) the number of accidents with and without leave of absence; ii) the number of working days lost; iii) a detailed report of serious accidents (with leave of absence, permanent injuries and fatalities) indicating causes, communication procedures with authorities and action plans to avoid recurrences; iv) a report on the area performance compared with the established goals; v) a report on the quantity of indicators by gender; vi) identified changes in health and safety standards; vii) training actions for employees and outsourced third parties; and viii) communication actions with employees and third parties.	1. Integrated Health and Safety Report.	1. In the ESCR.
		2. Include in the Personal Protective Equipment Management Procedure a requirement that PPE be available in different sizes, ensuring its suitability for men and women.	2. Personal Protective Equipment Management Procedure.	2. 2 months after the 1st disbursement.
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Greenhouse gases	1. Submit the annual inventory of greenhouse gas (GHG) emissions of the Project, including Scope 1 and Scope 2.	1. GHG emissions inventory.	1. In the ESCR.
		2. Submit projections of greenhouse gas emissions for the next calendar year.	2. Projection of GHG emissions.	2. In the ESCR.
3.2	Resource Efficiency	1. Submit integrated reports of the Loss Management Program, including a summary of all activities and an updated percentage of losses. Communicate the measures planned for the next calendar year.	1. Integrated Loss Management Program Report.	1. In the ESCR.
3.3	Pollution Control	1. Submit biannual reports on all Water Treatment Stations and wells used to supply water, including the analysis of all parameters contained in Ordinance GM/MS No. 888/2021.	1. Biannual reports on drinking water.	1. 6 months after the 1st disbursement and then in ESCR.
		2. Submit integrated analysis reports on compliance with Ordinance GM/MS No. 888/2021, identifying deviations and planning corrective actions to	2. Integrated Analysis Report on drinking water	2. 6 months after the 1st disbursement and then in

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		ensure compliance with legal regulations.		ESCR.
		3. Submit quarterly analysis reports on treated effluent from the 10 Sewage Treatment Stations with the highest flow rates, including the parameters: i) BOD, ii) ammonia nitrogen, iii) suspended solids, iv) pH, v) thermotolerant coliforms, vi) total phosphorus, and vii) oil and grease.	3. Quarterly reports on treated effluents.	3. 6 months after the 1st disbursement and then in ESCR.
		4. Submit integrated analysis reports on the performance of sewage treatment stations containing: i) operational performance; ii) the efficiency percentage of organic load removal; iii) compliance with the requirements of CONAMA Resolution No. 431/2011; iv) compliance with environmental license requirements; v) action plans to recover or improve the operational performance of sewage treatment stations; vi) sewage CAPEX expansion plans; and vii) a summary of recorded anomalies and accidents.	4. Integrated analysis report on ETE performance.	4. 6 months after the 1st disbursement and then in ESCR.
		5. Submit reports on the efficiency of the sludge treatment unit in Ponta do Ismael, including waste management procedures and results of sludge characterization treated in accordance with Standard NBR ABNT 10.004/2004.	5. Report on the efficiency of ETA sludge treatment.	5. 12 months after the 1st disbursement and then in ESCR .
		6. Submit integrated reports about the execution of Solid Waste Management Plans (SWMP) of the operational units, including: i) the annual quantities of waste by type; ii) types of waste disposal; iii) transport manifests; and iv) certificates detailing final disposal.	6. Integrated reports on SWMP.	6. 6 months after the 1st disbursement and then in ESCR.
		7. Draft a procedure expressly banning the acquisition and use of pesticides and Class Ia (extremely hazardous) or Class Ib (highly hazardous) chemicals mentioned in the Recommended Classification of Pesticides by Hazard and guidelines to classification by the World Health Organization ("WHO").	7. Pesticide Procedure.	7. Before the 1st disbursement.
PS 4: Community Health and Safety				
4.1	Preparation and Safety of Infrastructure and Equipment	1. Draft integrated reports on the implementation of the Environmental and Social Management Plan for Works and Traffic.	1. Integrated reports on the Environmental and Social Management Plan for Works and Traffic.	1. 6 months after the 1st disbursement and then in ESCR.
		2. Prepare a Procedure to Combat Sexual Exploitation, Sexual Harassment and Gender-Based Violence.	2. Procedure to Combat Sexual Exploitation, Sexual Harassment and Gender-Based Violence.	2. Before the 1st disbursement.
		3. Train its own staff and outsourced workers to apply the Procedure to Combat Sexual Exploitation, Sexual Harassment and Gender-Based Violence.	3. Evidence of training.	3. 6 months after the 1st disbursement and then in ESCR.
4.2	Security Staff	1. Design training activities for security staff grounded on the United Nations Voluntary Principles on Security and Human Rights.	1. Course plan.	1. Before the 1st disbursement.
		2. Organize training activities for security staff grounded on the United Nations Voluntary Principles on Security and Human Rights.	2. Evidence of training.	2. 6 months after the 1st disbursement and then in ESCR.
PS 5: Land Acquisition and Involuntary Resettlement				
5.1	Compensation and benefits for displaced persons	1. Develop an Involuntary Resettlement and Livelihood Restoration Framework that considers: i) compensation values which are equal to or greater than the replacement values of the asset; ii) calculating compensation for affecting temporary or permanent economic activity; iii) compiling a social register, if there is a need to resettle families; iv) executing a participatory process to choose the new property; v) supporting families impacted by resettlement; vi) periodic updating of social register	1. Involuntary Resettlement and Livelihood Restoration Framework.	1. 6 months after the 1st disbursement.

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		data; and vi) procedures to support the restoration of the livelihood of affected families after resettlement.		
		2. Implement an Involuntary Resettlement and Livelihood Restoration Framework, if necessary.	2. Evidence of implementation, where necessary.	2. As part of the ESCR.
PS 7: Indigenous Peoples				
7.1	Mitigation and Development Benefits	1. Develop a Social Responsibility and Engagement Program with Urban Indigenous Communities, which contains communication and engagement guidelines, and plans of social responsibility activities and programs in urban neighborhoods with a high concentration of Indigenous populations.	1. Social Responsibility and Engagement Program with Urban Indigenous Communities.	1. 4 months after the 1st disbursement.
		2. Implement a Social Responsibility and Engagement Program with Urban Indigenous Communities.	2. Report on Program Implementation	2. As part of the ESCR.
PS 8: Cultural Heritage				
8.1	Protection of cultural heritage in the preparation and execution of the project	1. Respond to and comply with IPHAN requirements for the Mocó Reservoir, as applicable.	1. Evidence of implementation.	1. As part of the ESCR.
8.2	Chance Finds	1. Prepare a procedure regarding chance finds in order to protect any archaeological or cultural artifacts during works.	1. Procedure for chance finds.	1. Before the 1st disbursement.
		2. Train construction coordinators and subcontractors in charge of works to apply the chance finds procedure.	2. Reports on training for employees and third parties in the chance finds procedure.	2. As part of the ESCR.
		3. Implement the chance finds procedure.	3. Reports on chance finds.	3. As part of the ESCR.