

**XOCHI – GUATEMALA**  
**Environmental and Social Action Plan (ESAP)**

No.	Aspect	Action	Deliverable	Delivery date
<b>PS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>				
1.1	Environmental and Social Management System	1. Develop an Environmental and Social Management System (ESMS) for the construction phase to include the following elements: i) policies; ii) identification of risks and impacts; iii) management programs; iv) organizational capacity and competency; v) emergency preparedness and response; vi) stakeholder engagement; vii) external communication and grievance mechanisms; viii) ongoing reporting to affected communities; and ix) monitoring and evaluation.	1. ESMS Manual for construction	1. Prior to first disbursement
		2. Develop an Environmental and Social Management System (ESMS) for the operations and maintenance (O&M) phase to include the following elements: i) policies; ii) identification of risks and impacts; iii) management programs; iv) organizational capacity and competency; v) emergency preparedness and response; vi) stakeholder engagement; vii) external communication and grievance mechanisms; viii) ongoing reporting to affected communities; and ix) monitoring and evaluation.	2. ESMS Manual for O&M	2. 30 days prior to O&M
		3. Implement the ESMS.	3. Evidence of implementation	3. As part of the Environmental and Social Compliance Report (ESCR)
1.2	Policy	1. Develop an Environmental, Social, and Occupational Health and Safety Policy or Policies.	1. Environmental, Social, and Occupational Health and Safety Policy or Policies	1. Prior to first disbursement
		2. Disseminate the Environmental, Social, and Occupational Health and Safety Policy or Policies.	2. Evidence of dissemination	2. Prior to first disbursement
1.3	Identification of Risks and Impacts	1. Obtain and keep current all environmental permits necessary for the construction and operation of the project, including: i) environmental license; ii) permits for the quarries located on the Nimá and Sis 1 rivers; iii) permits for material deposits; iv) forest exploitation permits (INAB); v) hydrocarbon storage permits (MEM); and vi) archaeological monitoring permits (DNPC).	1. Copies of the permits	1. 15 days prior to the initiation of construction and thereafter as part of the ESCR
		2. Develop for the construction phase procedures for the identification of hazards and assessment of risks (IPER) and impacts to communities, workers, and the environment, to be documented in a matrix to include all activities associated with the project and mitigation measures.	2. IPER procedures and matrices for the construction phase	2. 15 days prior to the initiation of construction
		3. Implement the construction-phase IPER procedures.	3. Evidence of implementation	3. As part of the ESCR
		4. Develop for the O&M phase procedures for the identification of hazards and assessment of risks (IPER) and impacts to communities, workers, and the environment, to be documented in a matrix to include all activities associated with the project and mitigation measures.	4. IPER procedures and matrices for the O&S phase	4. 15 days prior to the initiation of O&M
		5. Implement the O&M-phase IPER procedures.	5. Evidence of implementation	5. As part of the ESCR
		6. Conduct a Cumulative Impact Assessment that complies with IDB Invest's Practical Guide for Cumulative Impact Assessment and Management in Latin America and the Caribbean.	6. Cumulative Impact Assessment	6. Within one year of signing the loan agreement
1.4	Management Programs	1. Develop an Environmental Management Plan (EMP) that covers all project sites and activities, including: i) surplus material disposal sites; ii) quarries that will be used to extract alluvial material from rivers; and iii) maintenance of worker camps.	1. Environmental Management Plan	1. 15 days prior to the disposal of surplus material
		2. Implement the EMP.	2. Evidence of implementation	2. As part of the ESCR

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1.5	Organizational Capacity and Competency	1. Hire the personnel in the Environmental and Social Department required to monitor the environmental and social (E&S) performance of contractors and subcontractors.	1. Evidence of contracted personnel	1. Prior to first disbursement
1.6	Emergency Preparedness and Response	1. Develop an Emergency Preparedness and Response Plan (EPRP) for the contractor phase, to include: i) administrative and operational actions to control and mitigate potential damage to direct and indirect workers, affected communities, the environment, and infrastructure, to cover contractors and subcontractors; and ii) the most relevant climate risk scenarios (natural disasters and climate change).	1. Emergency Preparedness and Response Plan for construction	1. 15 days prior to the initiation of construction
		2. Implement the EPRP.	2. Evidence of implementation	2. As part of the ESCR
		3. Develop an Emergency Preparedness and Response Plan (EPRP) for the O&M phase, to include: i) administrative and operational actions to control and mitigate potential damage to direct and indirect workers, affected communities, the environment, and infrastructure, to cover contractors and subcontractors; and ii) the most relevant climate risk scenarios (natural disasters and climate change).	3. Emergency Preparedness and Response Plan for O&M	3. 30 days prior to the initiation of O&M
		4. Implement the EPRP.	4. Evidence of implementation	4. As part of the ESCR
1.7	Monitoring and Evaluation	1. Develop procedures to evaluate the construction-phase ESMS, including key performance indicators (KPIs).	1. Construction-phase ESMS evaluation procedures	1. 15 days prior to the initiation of construction
		2. Develop procedures to evaluate the O&M-phase ESMS, including key performance indicators (KPIs).	2. O&M-phase ESMS evaluation procedures	2. 30 days prior to the initiation of O&M
		3. Implement the ESMS evaluation procedures.	3. Evidence of implementation	3. As part of the ESCR
		4. Prepare a compliance matrix for legal and contractual obligations, to include: i) the controlling body that issues each permit or license; ii) the issued and validity dates; and iii) the people responsible for monitoring renewals.	4. Legal and contractual compliance matrix	2. 15 days prior to the initiation of construction
		5. Keep the legal and contractual compliance matrix updated.	5. Updated legal and contractual compliance matrix	3. As part of the ESCR
		6. Develop an internal or external audit procedure, to include responsibilities, methodology, schedule, and action plans.	6. Internal or external audit procedure	4. 15 prior to the initiation of construction and 30 days prior to the initiation of O&M
		7. Implement the internal or external audit procedure.	7. Evidence of implementation	5. As part of the ESCR
1.8	Stakeholder Engagement	1. Develop a Stakeholder Engagement Plan (SEP) that summarizes the project's previous stakeholder engagement activities, identifies and maps the project's stakeholders, and describes the project's future stakeholder engagement activities, including social investment programs.	1. Stakeholder Engagement Plan	1. Prior to first disbursement
		2. Implement the SEP.	2. Evidence of SEP implementation	2. As part of the ESCR
1.9	Community Grievance Mechanism	1. Develop a Community Grievance Mechanism (GM), to include provisions to address complaints from vulnerable groups and for receiving and addressing complaints of sexual harassment, gender-based violence, and discrimination.	1. Community Grievance Mechanism	1. Prior to first disbursement
		2. Implement the Community GM.	2. Community grievances report (in the form of a matrix)	2. As part of the ESCR
1.10	Ongoing Reporting to Affected Communities	1. Disclose Information about the project (environmental and social impact assessment and public consultation) on projects page of IDC's corporate website.	1. Evidence of disclosure	1. Prior to first disbursement
		2. Periodically disclose Information about the project (including its environmental and social performance) on the projects page of IDC's corporate website and on social media.	2. Evidence of disclosure	2. As part of the ESCR
		3. Maintain hard copies of the project's E&S reports at the project office in Mazatenango.	3. Hard copies of reports	3. As part of the ESCR
<b>PS 2: Labor and Working Conditions</b>				
2.1	Human Resources Policies and Procedures	1. Develop a Human and Labor Rights Policy, applicable to contractors and suppliers, that: i) recognizes worker freedom of association; ii) prohibits child and forced	1. Human and Labor Rights Policy	1. Prior to financial closing

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		labor; iii) prohibits any form of reprisals against workers or community members; and iv) prohibits the significant conversion of natural or critical habitat.		
2.2	Gender	1. Identify the gender risks of all project activities.	1. Gender risk report	1. Prior to first disbursement
		2. Develop measures to manage gender risks, including: i) policies on non-discrimination, inclusion, sexual harassment, gender-based violence, and cooperation with the judicial system in the investigation of gender-based violence complaints; and ii) a Code of Conduct for Workers that includes enforcement and supervision procedures and expresses zero tolerance for gender-based violence, including sexual harassment.	2. Measures to manage gender risks	2. Prior to first disbursement
		3. Implement the measures to manage gender risks.	3. Evidence of implementation	3. As part of the ESCR
2.3	Retrenchment	1. Develop a Retrenchment Plan that includes measures to mitigate the impact of layoffs of workers and contractors at the end of construction.	1. Retrenchment Plan	1. Before the termination of construction
		2. Implement the Retrenchment Plan.	2. Evidence of Retrenchment Plan implementation.	2. As part of the ESCR
2.4	Worker Grievance Mechanism	1. Develop a Worker Grievance Mechanism (GM) open to all project workers, including contractors, that includes specific procedures to receive and resolve gender-based violence complaints.	1. Worker Grievance Mechanism	1. Prior to first disbursement
		2. Implement the Worker GM.	2. Worker grievances report (in the form of a matrix)	2. As part of the ESCR
2.5	Occupational Health and Safety	1. Develop an Occupational Health and Safety (OHS) Plan for the project, to include a procedure for the provision of food services that guarantees the safety of food in worker camps, incorporating monitoring and control actions to verify its compliance by contractor companies.	1. Occupational Health and Safety Plan	1. Prior to the initiation of construction
		2. Implement the OHS Plan.	2. Evidence of implementation	2. As part of the ESCR
		3. Develop a Selection Procedure and Requirements for Temporary Accommodations (whether internal or external to the project site), to include: i) selection criteria for external accommodation sites; ii) minimum habitation conditions (standards); iii) requirement to generate monthly reports for each site that includes the number of workers housed and the name of the responsible contractor; and iv) details on monitoring and control actions.	3. Selection Procedure and Requirements for Temporary Accommodations	3. Prior to first disbursement
		4. Implement the Selection Procedure and Requirements for Temporary Accommodations	4. Evidence of implementation	4. As part of the ESCR
2.6	Workers Engaged by Third Parties	1. Include in contracts with third parties clauses for contractors and subcontractors to comply with: i) all project environmental and social requirements; ii) lender requirements; and iii) local employment (percentage) requirements.	1. Copies of the environmental and social requirements in third party contracts	1. Prior to the initiation of construction
		2. Develop a Contractor Management Plan, to include measures to monitor compliance with the project's environmental, labor, and health and safety policies, procedures, and plans.	2. Contractor Management Plan	2. Prior to the initiation of construction
		3. Implement the Contractor Management Plan	3. Evidence of Contractor Management Plan implementation	3. As part of the ESCR
		4. Train contractors and subcontractors on the following themes: i) the project's environmental, social, OHS, and labor policies, and the Worker Code of Conduct; ii) zero tolerance for gender-based violence, sexual harassment, workplace harassment, and discrimination.	4. Evidence of Training	4. Prior to the initiation of construction and thereafter as part of the ESCR
<b>PS 3: Resource Efficiency and Pollution Prevention</b>				
3.1	Resource Efficiency – Greenhouse Gases	1. Conduct a Scope 1 and 2 Greenhouse Gases (GHG) Inventory.	1. GHG Inventory	1. Six months after signing of loan agreement and thereafter as part of the ESCR

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		2. Develop a GHG reduction program.	2. GHG reduction program	2. 60 days after first disbursement
		3. Implement the GHG reduction program.	2. Evidence of implementation	2. As part of the ESCR
3.2	Resource Efficiency – Water Consumption	1. Develop and maintain a register of external suppliers of water required for the project, to include the coordinates of mechanical wells from which the water will be extracted and transported.	1. Register of external water suppliers	1. 15 days prior to the initiation of construction and thereafter as part of the ESCR
		2. Develop and maintain a control record of the volumes of water utilized for construction and human consumption according to the project's permits.	2. Control record of the volumes of water utilized for construction and human consumption	2. 15 days prior to the initiation of construction and thereafter as part of the ESCR
		3. Develop a hydrogeological study of the basins and sub-basins from which water will be utilized during construction.	3. Hydrogeological study	3. Within 60 days of signing the loan agreement
		4. Develop a water consumption program to improve efficiency in consumption and promote reduction during the project's construction phase.	4. Water consumption program	4. Within 90 days of signing the loan agreement
		5. Implement the water consumption program.	5. Evidence of implementation	5. As part of the ESCR
3.3	Pollution Prevention	1. Develop a program for the management of hazardous, non-hazardous, and special solid and liquid wastes that includes procedures for its classification, separation, temporary storage, reduction, transportation, and disposal.	1. Solid and liquid waste management program	1. 15 days prior to the initiation of construction
		2. Implement the solid and liquid waste management program.	2. Evidence of implementation	2. As part of the ESCR
		3. Develop a procedure for the handling of hazardous materials (e.g., fuels, lubricating oils, paints, solvents), to include: i) storage conditions in accordance with national regulations or recognized international standards; ii) Material Safety Data Sheets (MSDS) for each product; iii) substance incompatibility information; and iv) contingency plan in case of spills or accidents.	3. Hazardous materials management procedure	3. Within 60 days of signing the loan agreement
		4. Implement the hazardous materials management procedure.	4. Evidence of implementation	4. As part of the ESCR
<b>PS 4: Community Health and Safety</b>				
4.1	Community Health and Safety	1. Conduct an impact study on the houses located within 100 m of the project's construction activities, to include: i) details of the impacts; ii) measures to mitigate and control these impacts; and iii) monitoring measures to ensure the effectiveness of the mitigation measures.	1. Study of impacts on houses	1. Prior to the initiation of construction and thereafter as part of the ESCR
		2. Develop a Road Safety and Management Plan for the construction phase, to include: i) the identification of potential risks associated with the increase in vehicular traffic during construction; ii) measures for safe mobility in the communities surround the road infrastructure; iii) protocols to monitor and supervise vehicle routes, transit in populated areas, the frequency and times of cargo mobilization, the condition of vehicles, and the health conditions of drivers; iv) defensive driving training to avoid accidents for drivers; v) measure to inform local communities about traffic routes and schedules to reduce the risk of accidents, particularly those involving children; vi) measures to foster a culture of road safety among road users and local communities; and vii) awareness and education actions with the competent authorities in charge of road safety.	2. Road Safety and Management Plan for the construction phase	2. Prior to the initiation of construction
		3. Implement the Road Safety and Management Plan for the construction phase.	3. Evidence of implementation	3. As part of the ESCR
		4. Develop a Road Safety and Management Plan for the O&M phase, to include similar measures as the Road Safety and Management Plan for the construction phase.	4. Road Safety and Management Plan for the O&M phase	4. 60 days prior to the initiation of O&M
		5. Implement the Road Safety and Management Plan for the O&M phase.	5. Evidence of implementation	5. As part of the ESCR
4.2	Security Personnel	1. Carry out an evaluation to identify the risks of security companies hired directly and by subcontractors to include an analysis of the private security personnel offered.	1. Evaluation of security risks	1. Prior to first disbursement

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		2. Develop a Security Management Plan aligned with the United Nations Basic Principles on the Use of Force and Firearms, applicable to contractors, including procedures for vetting security guard applicants and ensuring they receive training in the use of force and human rights.	2. Security Management Plan	2. Prior to first disbursement
		3. Implement the Security Management Plan.	3. Evidence of Security Management Plan implementation	3. As part of the ESCR
<b>PS 5: Land Acquisition and Involuntary Resettlement</b>				
5.1	Resettlement and Livelihood Restoration Planning and Implementation	1. Document the consultation (including the presentation of potential positive and negative impacts) with the nine families to be resettled.	1. Minutes of meetings with the nine families	1. Prior to financial closing
		2. Obtain an agreement with the nine families regarding the details of their resettlement.	2. Agreement with the nine families	2. Prior to financial closing
		3. Develop a Resettlement Action Plan (RAP) for the nine families to be resettled.	3. Resettlement Action Plan	3. Prior to first disbursement
		4. Implement the RAP.	4. Evidence of RAP implementation	4. As part of the ESCR
<b>PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>				
6.1	Protection and Conservation of Biodiversity	1. Conduct a biological baseline (flora and fauna) of the secondary forest patches and aquatic ecosystems in the project's area of direct influence.	1. Updated biological baseline	1. 30 days prior to the initiation of construction
		2. Develop a Biodiversity Management Plan (BMP), to include: i) design guidelines for drainage systems to minimize impacts on biodiversity; ii) construction details to minimize impacts on biodiversity; iii) vegetation removal guidelines; iv) actions aimed at reducing pollution; v) erosion and sedimentation control measures; vi) wildlife rescue measures; and vii) guidelines for the location and construction of wildlife crossings (e.g., crossing trenches or biological bridges in the case of linear infrastructure).	2. Biodiversity Management Plan	2. Prior to first disbursement
		3. Implement the BMP.	3. Evidence of implementation	3. As part of the ESCR
		4. Develop a Biodiversity Monitoring and Evaluation Plan (BMEP) for the construction phase.	4. Biodiversity Monitoring and Evaluation Plan	4. 180 days after the signing of the loan agreement
		5. Implement the BMEP.	5. Evidence of implementation	5. As part of the ESCR
		6. Develop a Reforestation Plan for the project's right of way, surplus material disposal areas, and materials banks.	6. Reforestation Plan	6. 180 days after the signing of the loan agreement
		7. Implement the Reforestation Plan.	7. Evidence of implementation	7. As part of the ESCR
6.2	Management of Ecosystem Services	1. Identify the provisioning, regulating, cultural, and supporting ecosystem services in the project's area of direct impacts.	1. Ecosystem services identification report	1. 180 days after the signing of the loan agreement
		2. Adopt protection measures for identified ecosystem services.	2. Evidence of the adoption of measures	2. As part of the ESCR
<b>PS 7: Indigenous Peoples</b>				
7.1	Mitigation and Development Benefits	1. Implement, as part of the Stakeholder Engagement Plan, a culturally appropriate, consultative, participatory, and informative program to support vulnerable groups (specifically people who identify as indigenous) to overcome any potential barriers that limit their ability to participate in the project's engagement activities and social investment programs (e.g., EmpreDEX and Xamba).	1. Evidence of implementation	1. As part of the ESCR
<b>PS 8: Cultural Heritage</b>				
8.1	Chance Find Procedures	1. Develop a Cultural Heritage Management Plan (CHMP), to include: i) an archaeological monitoring program; ii) chance find procedures; iii) an archaeological site protection program; iv) a training program in the identification of chance finds and the chance find procedures for workers engaged in ground-disturbing activities; and v) publication of the results of archaeological rescue excavations.	1. Cultural Heritage Management Plan	1. Prior to the initiation of construction
		2. Implement the CHMP.	2. Evidence of CHMP implementation	2. As part of the ESCR