

**Cidade do Livro (CDL) Project – BRAZIL  
Environmental and Social Action Plan (ESAP)**

No.	Aspect	Action	Deliverable	Delivery date
<b>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, covering environmental, social, and occupational health, safety and security actions and guidelines, containing at least: i) Sustainability Policy; ii) assessment of aspects and impacts; iii) assessment of hazards and risks; iv) change management procedure; v) identification and evaluation of legal and other requirements; vi) establishment and management of objectives and goals; vii) organizational structure, capacity and competence; viii) contractor and biomass supplier management procedure; ix) resource provision and management procedure; x) procedures and work instructions related to the management of critical activities and operations; xi) training, development, and awareness-raising plan; xii) internal monitoring and contractor supervision procedures; xiii) biomass supplier monitoring and supervision procedures; xiv) accident logging and handling requests; xv) deviation and noncompliance logging requests; xvi) critical and statistical data analysis requests; and xvii) frequency of performance reports.	1. ESMS for the construction phase.	1. Within 3 months after the loan agreement is signed.
		2. Develop an ESMS for the operation phase	2. ESMS for the operation phase.	1. Within 3 months before the start of the operation phase.
		3. Implement the ESMS during the construction phase	3. Evidence of implementation of the ESMS for the construction phase.	2. Periodically, through the Environmental and Social Compliance Reports (ESCRs).
		4. Implement the ESMS during the operation phase	4. Evidence of implementation of the ESMS for the operation phase.	3. As part of the ESCR.
1.2	Cumulative Impact Analysis	1. Develop a Cumulative Impact Assessment.	1. Cumulative Impact Assessment.	1. Within 6 months after the loan agreement is signed.
1.3	Gender Risks	1. Develop educational content on gender violence prevention.	1. Educational content on gender violence prevention.	1. Within 4 months after the loan agreement is signed.
		2. Implement internal campaigns to prevent gender violence.	2. Evidence of implementation of campaigns.	2. As part of the ESCR.
1.4	Organizational Capacity and Competency	1. Implementing an organizational structure that defines roles, responsibilities, and authority to implement the BEP and the ESMS.	1. Presenting a Responsibility Matrix detailing the roles played by each management team member.	1. Before the loan agreement is signed.
		2. Strengthen the Project's EHS and Social teams to allocate at least one dedicated member to each area during the Project's construction.	3. Present evidence of hiring professionals with confirmed experience (Social and EHS).	1. Before the first disbursement.

1.5	Emergency Preparedness and Response	1. Develop an Emergency Response Plan (ERP) for the construction phase, which should include, among other aspects: i) guidelines to ensure synergy actions; ii) thresholds and means of interaction among contractors; iii) definition of resources; iv) response structure; v) resource management and maintenance; vi) communication and response flows; vii) performance and evaluation of emergency drills.	1. ERP for the construction phase.	1. Within 15 days before the start of construction.
		2. Implement the ERP during the construction phase.	2. Evidence of implementation of the ERP for the construction phase.	2. As part of the ESCR.
		3. Developing an ERP for the operation phase.	3. ERP for the operation phase.	3. Within 1 month before the start of operations.
		4. Implement the ERP during the operation phase.	4. Evidence of implementation of the ERP for the operation phase	4. As part of the ESCR.
1.6	Stakeholder Engagement	1. Develop and implement a Stakeholder Engagement Plan (SEP) pursuant to the requirements of PS 1.	1. Stakeholder Engagement Plan (SEP).	Within 4 months after the loan agreement is signed.
		2. Implementing the SEP	2. Evidence of implementation of the SEP.	Periodically in the ESCR.
1.7	Community Grievance Mechanism	1. Develop a Grievance Mechanism, considering, at a minimum: (i) easy access for stakeholders; (ii) confidential registration; and (iii) appropriate log and flow (flowchart of inquiries received, sector to which they should be directed, and how to respond) of requests and responses.	1. Grievance Mechanism.	1. Within 15 days before the start of construction.
		2. Implement the Grievance Mechanism	2. Evidence of implementation of the Grievance Mechanism.	2. As part of the ESCR.
<b>PS 2 – LABOR AND WORKING CONDITIONS</b>				
2.1	Human Resource Policies and Procedures	1. Develop a Human Resource Policy that formalizes the company's commitments to PS 2 principles related to: (i) combating child and slave labor (forced or compulsory); and (ii) combating discrimination and harassment (moral or sexual); (iii) gender equality; (iv) freedom of association; (v) workforce hiring and qualification processes and activities; (vi) salaries and benefit practices; (vii) shift hours and remuneration or compensation for overtime; (viii) disciplinary measures; (ix) conflict prevention (including internal grievance mechanism); (x) hiring and termination process; (xi) training and development; and (xii) staff reduction planning.	1. HR Policy and Procedures	1. Within 2 months after the loan agreement is signed.
		2. Implement the Human Resource Policy	2. Evidence of implementation	2. As part of the ESCR.
2.2	Grievance Mechanism	1. Design a mechanism to manage worker grievances (own and third-party) that contains a specific channel for grievances related to gender violence and ensures a process to receive and investigate reports in a confidential and impartial manner.	1. Procedure to receive and manage grievances.	1. Within 15 days before the start of construction.
		2. Implement the Grievance Mechanism	2. Evidence of implementation.	2. As part of the ESCR.

2.3	Workers Engaged by Third Parties	1. Develop a Contractor Management Manual that covers selection, contracting, and management of suppliers and contractors.	1. Contractor Management Manual.	1. Within 15 days before the start of construction.
		2. Implement the Contractor Management Manual	1. Evidence of implementation of the Manual.	2. As part of the ESCR.
2.4	Supply Chain	1. Develop a procedure to evaluate the supply chain and ensure third-party compliance with Company policies.	1. Presenting the supply-chain evaluation procedure	1. Within 30 days before the start of operations
		2. Implementing a supply-chain evaluation procedure	2. Evidence of implementation	2. As part of the ESCR

<b>PS 3 – RESOURCE EFFICIENCY AND POLLUTION PREVENTION</b>				
3.1	Greenhouse Gases	1. Develop a Greenhouse Gas (GHG) Emission Management Plan.	1. GHG Management Plan for the construction phase.	1. Within 30 days before the start of construction
		2. Develop a GHG Inventory for the project's construction phase	2. GHG Inventory for the construction phase	2. As part of the ESCR
		3. Develop a GHG Inventory for the project's operation phase	3. GHG Inventory for the operation phase	3. As part of the ESCR
3.2	Pollution Prevention / Air Quality	1. Ensure that the concentrations of air pollutants generated in the Mill's operation phase are compliant with reference standards (quality and emission).	1. Periodic monitoring reports.	1. As part of the ESCR.
<b>PS 4 – COMMUNITY HEALTH, SAFETY AND SECURITY</b>				
4.1	Community Health, Safety, and Security	1. Establish contract clauses requiring suppliers of inputs for the operations to take the appropriate precautions to ensure that transportation vehicles operate in accordance with safety standards and traffic laws in effect, including requiring speed control records for the vehicles that transport raw materials, including hazardous products.	1. Evidence of implementation	1. Before the supply agreements are signed.
		2. Present Noise Measurement (Baseline) Study focused on critical receptors located along the TL in accordance with the standards established in current legislation and WBG EHS guidelines.	1. Baseline study	1. Within 15 days before the start of Transmission Line construction.
4.2	Security Personnel	1. Should the Project have armed guards, develop an Armed Personnel Management Plan based on a Security Risk Assessment.	1. Security Risks Assessment and Management Plan	1. Within 15 days before the start of construction.
		2. If necessary, implement the Security Management Plan	2. Evidence of implementation	2. As part of the ESCR.
<b>PS 5 –LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT</b>				
5.1	Land acquisition, physical and economic displacement.	1. Review the land acquisition and physical and economic displacement processes to guarantee: i) compensation for use restrictions when properties without regulated titles are impacted; and ii) compensation for agricultural production and/or livelihood losses caused by the establishment of the TL's easement area.	1. Land-acquisition procedure	1. Within 3 months after the loan agreement is signed.
		2. Implementing the land-acquisition procedure	2. Evidence of implementation	2. As part of the ESCR.
5.2	Grievance Mechanism	1. Designing a system to receive inquiries and complaints from people affected by the TL, to ensure that requests, referrals, and responses are logged.	1. Grievance Mechanism	1. Within 3 months after the loan agreement is signed.
		2. Implement the system to receive inquiries and complaints from people affected by the TL	2. Evidence of implementation	2. As part of the ESCR.
<b>PD 6 – BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>				
6.1	Protection and Conservation of Biodiversity	1. Conduct a flora and fauna assessment in the natural habitats that will be affected by the TL, focusing mainly, but not only, on the characterization of the directly affected flora and bird fauna in the region, and conducting a critical analysis of the TL's potential impacts on biodiversity.	1. Flora and fauna baseline in the natural habitats affected by the TL.	1. Within 15 days before the start of construction.
		2. Updating the unified database with the results of the flora and fauna assessments (diagnostic and monitoring).	2. Updated biodiversity database.	2. As part of the ESCR.
6.2	Critical habitats	1. Develop a Biodiversity Priority Value Evaluation Procedure and for potential critical habitats in the region of the properties of interest for leasing and biomass suppliers.	1. Biodiversity Priority Value Evaluation Procedure.	1. Within 6 months before the start of operations.
		2. Implement the Biodiversity Priority Value Evaluation Procedure	2. Evidence of implementation.	2. As part of the ESCR.

6.3	Monitoring and recovery programs	1. Implement a fauna monitoring program focused on bird fauna.	1. Evidence of implementation	1. As part of the ESCR.
6.4	Sustainable management of living natural resources & Supply Chain	1. Develop a Procedure to Analyze Social and Environmental Risks and Impacts and Monitor Leased Areas and the Supply Chain.	1. Procedure to Analyze Environmental and Social Risks and Impacts	1. Within 90 days before the start of operations.
		2. Implement the Procedure to Analyze Social and Environmental Risks and Impacts and Monitor Leased Areas and the Supply Chain.	2. Evidence of implementation.	2. As part of the ESCR
<b>PS 8 – CULTURAL HERITAGE</b>				
8.1	Chance Find Procedure	1. Develop a Chance Find Procedure	1. Chance Find Procedure.	1. Within 15 days before the start of construction.