Enhancing Regional Transportation via the Waterway with Rocktree Group
PARAGUAY, ARGENTINA AND URUGUAY / 16065-01
Environmental and Social Action Plan (ESAP)

No.	Aspect	Action	Deliverable	Delivery date
PS 1: Assessment and Management of Environmental and Social Risks and Impacts				
1.1	Regulatory Compliance	1. Present valid environmental permits for all Project Facilities (TF2, TF3, APA, Base Pueblo Esther, Transshipment Operation and navigation operations), where applicable.	1. Copy of environmental permits.	1. Before the 1st disbursement (1D).
		2. Produce a consolidated legal and lender requirements matrix by jurisdiction and asset, covering environmental and social applicable obligations (port, maritime, customs, labor, OHS, community safety, security, etc.).	2. Legal and lender requirements matrix.	2. Within 6 months after 1D and then as part of the Environmental and Social Compliance Report (ESCR).
		3. Develop and adopt a procedure to assess and evaluate the impact of regulatory changes on the environmental and social management of Project Facilities.	3. Regulatory Changes Assessment and Evaluation Procedure.	3. 6 months after 1D
1.2	Environmental and Social Management System (ESMS)	1. Develop and implement a corporate ESMS that considers the existing procedures and includes: i) a Corporate Environmental and Social Sustainability Policy; ii) procedures for the identification of environmental, occupational and social impacts; iii) risk and impact management programs and procedures; iv) a description of the organizational capacity to implement the system; v) emergency preparedness and response protocols; vi) monitoring and review procedures; vii) a stakeholder engagement plan: and viii) an external communications and grievance mechanisms.	1. Corporate ESMS manual.	1. Foundational ESMS to be presented 6 months after 1D. Full integration 12 months after 1D and then as part of the ESCR.
1.3	Policy	1. As part of the ESMS, develop and implement a Corporate E&S Sustainability Policy aligned with best international practices that includes provisions for stakeholder engagement, vulnerable groups, gender equality, GBVH prevention, community protection, resource efficiency, pollution prevention, security management and continuous improvement.	1. Corporate E&S Sustainability Policy.	1. 6 months after 1D and thereafter as part of the ESCR.
1.4	Risk and Impact Identification	1. As part of the ESMS, develop and maintain up to date a social risk and impact identification matrix that includes social, human rights, gender, vulnerable groups, security and cumulative risks, as well as direct and indirect impacts, third-party exposure, contractor and supply-chain interfaces, labor influx, community health and safety, ecosystem services/livelihoods, climate-related social vulnerability and future expansion screening.	1. Social risks and impact identification matrix.	1. 6 months after 1D (foundational ESMS element) and thereafter as part of the ESCR.
1.5	Organizational Capacity	1. As part of the ESMS, define corporate roles, responsibilities and resources for social performance management (stakeholder engagement, grievance management, human rights).	1. Updated organigram for all Project Facilities.	1. Within 6 months after 1D (foundational element).
		2. Based on the results of an EHS/QHSE and social personnel inventory of for all Project Facilities, appoint qualified social performance/community liaison capacity to close any gaps found. Completion may be evidenced by Rocktree-issued and internally approved documentation, assignment of responsible personnel, evidence of implementation, or IDB Invest verification/approval, as applicable.	2. Evidence of appointments of additional required personnel	2. 6 months after 1D.
1.6	Management Programs	1. Develop and implement a Construction Environmental Management Plan (CEMP) for the new TF3 fertilizer plant that, using a risk-based and proportionate approach, includes the following requirements, as applicable: i) environmental, occupational and social commitments for contractors, including contractual clauses; ii) a waste management	1. CEMP.	1. Before the order to proceed and thereafter as part of the ESCR.

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		program; iii) a hazardous substances management program; iv) worker and contractor grievance channels; v) health and safety requirements; vi) an emissions control procedure covering noise, dust, and sanitary effluents; vii) an emergency preparedness and response procedure; viii) reporting requirements for contractors, ix) the description of traffic and access controls; x) provisions for community nuisance management, xi) labor and working-condition requirements for contractors and subcontractors, xii) GBVH/SEA/SH prevention measures; xiii) community communication triggers; and xiv) incident reporting and corrective-action tracking procedures.		
		2. Develop and implement a Climate Change Adaptation Plan to address climate change risks in all Project Facilities that includes the impacts of river level changes linked to prolonged droughts and floods and contains: i) an assessment of climate changes scenarios (pessimistic, foreseeable and optimistic); ii) an assessment of potential adaptation measures; and iii) a schedule for their implementation (according to their priority).	1. Climate Change Adaptation Plan.	1. 12 months after 1Dand thereafter as part of the ESCR, subject to adjustment if third-party dependencies outside Sponsor's reasonable control demonstrably affect completion.
1.7	Emergency Preparedness and Response	1. Based on the assessment of emergency scenarios of all Project Facilities (fuel-handling, vessel incidents, spills, explosions, toxic exposure, etc.), update the Emergency Plans to include: i) community emergency preparedness provisions, especially for nearby residences, schools, river users and vulnerable receptors; ii) notification protocols; iii) provisions for community participation in emergency drills; and iv) post-incident social impact review procedures. .	1. Updated Emergency Plans.	1. 12 months after 1D.
		2. Based on the results of a hazard and operability study (HAZOP) and a quantitative risk Assessment (QRA), update the Emergency Preparedness and Response Plan for the fuel storage and distribution facilities at FT3 and implement measures required to reduce any identified intolerable risk. Any additional infrastructure CAPEX beyond such mandatory mitigation may be budgeted and scheduled as a separate work stream outside the ESAP timeline.	1. Updated Emergency Preparedness and Response Plan for the fuel storage and distribution facilities at FT3	1. 12 months after 1D.
		3. Implement all Project Facilities periodic emergency simulations with the participation of the community (local emergency services, public authorities and affected receptors as applicable).	1. Emergency Simulations Reports.	1. As part of the ESCR.
		4. Present annual emergency assessment reports covering all Project Facilities, including: i) a brief description of the emergency; ii) management actions; and iii) any corrective action plans to improve responses.	1. Emergency Reports.	1. As part of the ESCR.
1.8	Stakeholder Engagement	1. Develop and implement a Stakeholder Engagement Plan (SEP) that includes: i) a stakeholder mapping, including vulnerable stakeholder identification; ii) proposed consultation methods; iii) information disclosure protocols; iv) engagement frequencies by stakeholder group; v) roles and responsibilities for its implementation; vi) commitments tracking procedures; and vii) periodic reporting to affected stakeholders, including the disclosure of E&S performance information, emergency preparedness updates, grievance trends and progress on corrective actions.	1. SEP.	1. 6 months after 1D and thereafter as part of the ESCR.

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		2. Develop and implement a Community Grievance Mechanism that includes, among other characteristics: i) grievance registration protocols; ii) differentiated access channels for vulnerable groups; iii) confidentiality protection protocols; iv) accessible communication formats and referrals for sensitive complaints (gender-related grievances); iv) response timelines; v) escalation procedures; vi) closure procedures; and vii) reporting requirements.	1. Community Grievance Mechanism.	1. 6 months after 1D and thereafter as part of the ESCR.
1.9	Monitoring and Review	1. For all Project Facilities, present audit reports on the performance of the ESMS, that contain a list of (a) improvement opportunities and (b) non-compliances, and corrective action plans, where needed.	1. ESMS Audit Reports.	1. Annually as part of the ESCR.
		2. Update the existing monitoring procedures by including social performance indicators related to: i) community engagement; ii) grievance trends; iii) community incidents, including vulnerable groups; iv) contractor social performance; and v) corrective-action closure.	2. Updated monitoring procedures.	2. As part of the ESCR.
PS 2: Labor and Working Conditions				
2.1	Non-Discrimination and Equal Opportunity	1. Based on a gender and diversity analysis of recruitment, promotion, training, pay-gap review, grievances, procurement and contractor management processes, adopt appropriate corrective actions to eliminate any material identified disparities. Completion may be evidenced by Rocktree-issued and internally approved documentation, assignment of responsible personnel, evidence of implementation, or IDB Invest verification/approval, as applicable.	1. Set of corrective actions.	1. As part of the ESCR.
		2. Integrate, where applicable, disability-specific accessibility measures into HR policies, recruitment process, workplace design, emergency preparedness, PPE provision and grievance mechanisms	1. Updated HR policies, recruitment process, workplace design, emergency preparedness, PPE provision and grievance mechanisms.	1. 9 months after 1D and thereafter as part of the ESCR.
		3. Ensure that persons with disabilities are treated and hired as required by local legislation in Argentina, Paraguay and Uruguay. Completion may be evidenced by Rocktree-issued and internally approved documentation, assignment of responsible personnel, evidence of implementation, or IDB Invest verification/approval, as applicable.	1. Evidence of compliance with local legislation.	1. 6 months after 1D and thereafter as part of the ESCR
		4. Based on the results of a Gender and GBVH Risk Assessment that covering relevant workers, contractors, vessel operations, terminals, shipyard activities and affected communities, as determined through a risk-based approach. If needed, develop and implement gender-response measures.	1. Gender-response measures.	1. 6 months after 1D for highest risk operations, contractors and interfaces. Full coverage within 12 months after 1D and thereafter as part of ESCR.
2.2	Health and Safety	1. Provide facility disaggregated health and safety statistics for: i) Lost Time Injuries (LTI); ii) Lost Time Injury Frequency Rate (LTIFR); iii) Severity Rate (total lost workdays resulting from occupational injuries); iv) work-related fatalities; v) occupational illness cases; vi) contractor inclusion; and vii) gender-disaggregated occupational injury.	1. Health and Safety statistics	1. As part of the ESCR.
		2. Adopt corrective actions to improve health and safety conditions in all Project Facilities.	1. H&S Corrective action reports	1. As part of the ESCR
2.3	Retrenchment	1. Develop and implement a retrenchment framework that includes consultation, objective selection criteria, legal compliance, non-discrimination safeguards and support measures	1. Retrenchment Framework.	1. 6 months after 1D.
2.4	Child and Forced Labor	1. Develop, implement and disseminate a Child and Forced Labor Protection Policy that includes: (i) provisions to prevent child and forced labor; (ii) appropriate contractual clauses for relevant higher-risk or material third parties; and (iii) training for Company	1. Child and Forced Labor Protection Policy.	1. 6 months after 1D and thereafter as part of the ESCR.

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		employees and relevant contractor workers to understand and apply the policy where needed.		
		2. Develop and implement a Supply Chain Human Rights Risk Assessment for critical suppliers, ship-management providers, manning agencies, shipyard contractors and high-risk services, through a risk-tiered approach, with particular focus on relevant higher-risk or material counterparties. The assessment will consider: (a) includes due diligence procedures and periodic evaluation of contractor and suppliers, (b) convers the analysis of child labor, forced labor, occupational health and safety, worker grievance access, discrimination, and human-rights in the supply chain of all Project Facilities, and (c) contains corrective-action tracking and flow-down requirements.	1. Supply Chain Human Rights Risk Assessment Procedure.	1. 9 months after 1D for highest-risk suppliers/contractors; full coverage within 12 months after 1D and thereafter in the ESCR..
2.5	Internal Grievance Mechanism	1. Update the existing internal grievance mechanism by including: i) a dedicated protocol for managing sensitive complaints (sexual harassment, GBVH, discrimination or other high-risk cases requiring survivor-centered handling and specialized referral pathways); ii) make it applicable to direct employees, contracted workers, subcontractors, temporary workers and crews; iii) a centralized grievance register; and iv) KPIs Sucha as response/closure times, trend analysis, appeal tracking, worker satisfaction/effectiveness review and non-retaliation monitoring.	1. Updated Internal Grievance Mechanism.	1. 9 months after 1D and thereafter as part of the ESCR.
2.6	Contractor Labor Management	1. Establish contractor labor-management requirements, with particular focus on relevant higher-risk or material contractors, that include: i) labor/OHS clauses; ii) contractor induction requirements; iii) worker grievance access; iv) payroll/rest-hour checks requirements; v) child/forced labor controls; vi) non-discrimination provisions; viii) accommodation controls, when applicable; ix) OHS verification protocols; and x) audits and corrective-action tracking protocols.	1. Contractor Labor Management Procedure.	1. 6 months after 1D. .
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Water Consumption	1. Present water sourcing and consumption for main Project Facilities and operations.	1. Water sourcing and consumption data.	1. As part of the ESCR. .
		2. Present a set of efficiency measures to optimize water consumption (wastewater generation/discharge controls, reuse/reduction opportunities, etc.).	2. Water consumption reduction measures.	2. Within 6 months after 1D and thereafter as part of the ESCR
3.2	Resource Efficiency	1. Develop and implement a Resource Efficiency and Decarbonization Plan for all Project Facilities that includes: i) energy and fuel baselines; ii) fuel-intensity indicators by convoy type; iii) ratios of greenhouse gases emissions (tCO2e per ton transported); iv) ecological/economical speed parameters; v) convoy optimization KPIs; vi) solar-transition tracking procedures; and vii) responsibilities, timelines, annual performance review and measurable reduction targets where feasible.	1. Resource Efficiency and Decarbonization Plan.	3. 12 months after 1D and thereafter as part of the ESCR.
3.3	Greenhouse Gases (GHG)	1. Develop a GHG Inventory for operations in Paraguay, Argentina and Uruguay by completing Scope 1 and Scope 2 quantification and defining the Scope 3 boundary and methodology first, followed by progressive quantification of material Scope 3 categories during the agreed implementation period.	1. Greenhouse Gas Inventory	1. 12 months after 1D for Scope 1 & 2 and Scope 3 boundary/methodology; progressive Scope 3 quantification during Year 2 and thereafter in the ESCR.
3.4	Pollution Prevention	1. Develop and implement periodic Waste Management, Monitoring and Performance Reports covering all Project Facilities that require: i) annual waste inventories for common and hazardous wastes; ii) waste transportation certificates; iii) final destination certificates; iv) initiatives for circular economy (recycling and/or waste minimization).	1. Waste Management, Monitoring and Performance Reports	1. As part of the ESCR.

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		2. Develop and implement a consolidated Air Emissions and Dust Management Plan covering all Project Facilities that includes: i) point-source identification; ii) routine monitoring procedures; iii) applicable standards; iv) maintenance requirements; v) corrective actions trigger levels; vi) complaint-response procedures; and vii) implementation schedule for additional controls, where appropriate. Trigger levels will inform a documented, risk-based and proportionate assessment of appropriate corrective measures, including any related CAPEX..	1. Air Emissions and Dust Management Plan.	1. 9 months after 1D and thereafter as part of the ESCR.
PS 4: Community Health, Safety, and Security				
4.1	Security Personnel	1. Develop and implement, as appropriate for relevant higher-risk or material security providers, a Security Management Plan aligned with the United Nations Voluntary Principles on Security and Human Rights that defines roles, responsibilities, behavioral expectations, de-escalation requirements, proportional response principles, incident reporting obligations and contractor oversight requirements and training into security-provider induction and refresher training programs, and accessible grievance channels.	1. Security Management Plan.	1. 9 months after 1D and thereafter as part of the ESCR, subject to adjustment if third-party dependencies outside Sponsor's reasonable control demonstrably affect completion.