

PROJECT 14128-01 – VENEZA PARAGUAY - PARAGUAY
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	E&S Assessment and Management System	1. Design an Environmental and Social Management System (ESMS) including policies, plans and procedures. The ESMS must comply with the requirements of the International Finance Corporation (IFC) Performance Standard (PS) 1 and include all the plans required by the environmental, social, health and safety authorities as specific plans or procedures.	1. Environmental and Social Management System Manual and Associated Procedures.	1. Up to four months after financial closure.
		2. Implement the ESMS during the construction and operating phases.	2. Evidence of implementation of the ESMS during the construction and operating phases.	2. As part of the Environmental and Social Compliance Report (ESCR).
1.2	Policy	1. Disclose the Environmental, Social, Health and Safety (ESHS) Policy to internal and external audiences using its website (when available) and other means of communication, including during the construction stage.	1. Evidence of policy communication and disclosure	1. Before signing the loan agreement.
1.3	Gender Risks	1. Prepare internal campaigns with educational content regarding the prevention of gender-based violence.	1. Educational content regarding the prevention of gender-based violence.	1. Up to three months after financial closure.
		2. Implement annual internal campaigns regarding the prevention of gender-based violence.	2. Evidence of campaign implementation.	2. As part of the ESCR.
1.4	Organizational Capacity and Competency	1. Hire an environmental, health and safety (EHS) officer. This officer will report directly to Board, and their purpose will be to implement and maintain the ESMS.	1. EHS officer recruited.	1. Up to two months prior to the start of operations.
1.5		2. Incorporate ESHS requirements into contracts with companies involved in the construction stage, and hire an EHS technician per contract.	2. Evidence of incorporation the ESHS requirements into contracts.	2. Up to three months after financial closure.
1.6	Emergency Preparedness and Response	1. Prepare an Emergency Preparedness and Response Plan (ERP) for the construction and operating phases.	1. Emergency Preparedness and Response (ERP).	1. Up to three months after financial closure.
		2. Implement the ERP. Emergency drills must be conducted at least once a year.	2. Evidence of ERP implementation.	2. As part of the ESCR.
1.7	Stakeholder Engagement	1. Prepare a Stakeholder Engagement Plan (SEP) that includes: (i) stakeholder participation mapping, analysis and planning; (ii) a stakeholder information inquiry and communication mechanism; and (iii) a grievance capture and resolution mechanism that is free, understandable, culturally appropriate, easily accessible, and protects those submitting a grievance from any kind of retaliation.	1. Stakeholder Engagement Plan.	1. Up to four months after financial closure.
PS 2: Labor and Working Conditions				
2.1	Human Resources Policies and Procedures	1. Prepare and implement an HR policy, which complies with Paraguay's laws and PS2 requirements.	1. Human Resources Policy.	1. Up to four months after financial closure.
2.2	Non-discrimination and Equal Opportunity	1. Develop a recruitment program that encourages equal opportunities for all employees, which improves employee equity and greater gender equality during the operating stage.	1. Recruitment program that focuses on gender equality.	1. Up to six months after financial closure.
2.3	Grievance Mechanism	1. Develop a grievance mechanism that describes how it is communicated and the process transparency, confidentiality, protection against retaliation and other principles.	1. Grievance Mechanism.	1. Up to six months after financial closure.
		2. Adopt the grievance mechanism.	2. Grievances report.	2. As part of the ESCR.
2.4	Occupational Health and Safety	1. Develop specific OHS programs within its ESMS.	1. OHS Plans and Procedures.	1. Up to six months after financial closure.

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2.5		2. Implement OHS plans and programs.	2. Evidence of implementation of OHS plans and programs.	2. As part of the ESCR.
2.6	Workers Engaged by Third Parties	1. Develop and implement an E&S manual for contractors, to ensure that third party companies comply with Veneza's corporate requirements, Paraguayan legislation and the ND2 principles.	1. E&S Manual for Contractors.	1. Up to three months after financial closure.
PS 3: Resource Efficiency and Pollution Prevention				
3.1	Greenhouse Gases	1. Prepare an inventory of GHG emissions and include the main results in its regular environmental and social performance reports.	1. Greenhouse Gas emissions Inventory.	1. As part of the ESCR.
3.2	Pesticide Use and Management	1. Do not purchase, store, use, manufacture or sell products in the categories Ia (extremely hazardous) and Ib (highly hazardous) from the WHO Recommended Classification of Pesticides by Hazard.	1. Chemical evaluation procedure and substitution plan (if necessary).	1. Up to eight months after financial closure.
3.3	Air Quality and Atmospheric Emissions	1. Monitor emissions from specific sources at least annually and compare them to limits in the World Bank Group (WBG) general environmental, health and safety guidelines and Paraguayan legislation.	1. Monitoring reports.	1. As part of the ESCR.
3.4	Liquid effluent and wastewater	1. Monitor effluent quality to ensure compliance with Paraguayan regulations and WBG general environmental, health and safety guidelines.	1. Monitoring reports.	1. As part of the ESCR.
PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources				
6.1	Supply Chain	1. Veneza will be included in Durlin Group's supplier traceability program, while respecting the specific characteristics of its business, to ensure that it complies with the company's deforestation requirements and appropriate environmental and social standards.	1. Traceability and program progress monitoring reports.	1. As part of the ESCR.