

CORRECTIVE ENVIRONMENTAL AND SOCIAL ACTION PLAN (CAP)¹
HIDROVIAS DO BRASIL #34846
Completion Status

ESAP Item ID	Required Action	Initial Due Date	New Due Date	Status	Completion Indicator(s)
1.1	Based on the results of the E&S audits, review and amend the corporate-wide ESMS and each individual project-specific ESMS and ESMS Manual in line with PS1 requirements, WBG and IFC's General and sectoral EHS Guidelines, including but not limited to management plans focused on affected communities, including communication for emergency preparedness and response, risks and impacts from air emissions, noise, terrestrial traffic and navigation, water quality and effluents, contractors activities, wastes, hazardous and non-hazardous pollutants and materials, hazardous wastes, pests, community health and safety, including GBV, security, SEP, including grievances mechanisms. Review KPIs and related targets and monitoring programs, including training to employees and contractors, inspections, supervisions and audits, and periodic review of the ESMS.	North Operations²: Draft revised Management Plans: 30 December 2021 Final ESMS Manual: 28 February 2022 South Operations³: Draft revised Management Plans: 30 June 2022 Final ESMS Manual: 31 August 2022 Santos Project⁴: Draft revised Management Plans: 30 September 2022 Final ESMS Manual: 30 November 2022	ESMS Manual update: April 28, 2023 Plans and Procedures: July 30, 2023	Rescheduled	Updated ESMS manual describing contents of the Management System and related Plans and Procedures, acceptable to IFC. Evidence of implementation of the ESMS in the annual monitoring report to IFC.
1.2	Complete independent E&S audits of each of the current operations against compliance with IFC's PS. As a result of the E&S audits, develop an action plan for any gaps identified, including (i) determining the need of supplemental studies, including for air emissions, noise, terrestrial traffic, navigation, water quality, effluents, drainage, resource availability, land access, community health and safety, including GBV and specific risks and impacts relevant to navigation, cabotage and motor vehicle safety, use of access roads, trucks parking areas and visitors' areas for each operation occupational health and safety, etc.; (ii) identifying corrective mitigation actions for risks and impacts to affected communities, including resettlement impacts, livelihood impacts and the need for relocation, compensation and livelihood	North Operations: E&S consultant hired: 30 June 2021 E&S audit completed: 29 October 2021 South Operations: Draft ToR: 31 August 2021 E&S consultant hired: 31 January 2022 E&S audit completed: 29 April 2022 Salt Project:	Draft E&S Audit reports for all operations: December 31, 2022	In progress Rescheduled	E&S consultant hired. E&S audit reports including action plans for each operation. Corrective action plans developed, acceptable to IFC.

¹ CAP disclosed on June 21, 2021: <https://disclosures.ifc.org/project-detail/ESRS/34846/hdb> under Client Documentation box.

² **North Operations:**

- Port in Vila do Conde, Barcarena (Para State) – TUP
- Terminal in Miritituba, Itaituba (Para State) – ETC
- Navigation
- Cabotage

³ **South Operations:**

- Navigation on the Paraná-Paraguay waterway

⁴ **Santos Port Terminal:**

- Santos Port Terminal (São Paulo State)

ESAP Item ID	Required Action	Initial Due Date	New Due Date	Status	Completion Indicator(s)
	restoration; and (iii) identifying vulnerable groups or individuals that were negatively affected by the project. The audit will assess and identify relevant mitigation measures and will include consultation with affected stakeholders.	Draft ToR: 29 October 2021 E&S consultant hired: 29 April 2022 E&S audit completed: 29 July 2022			
1.3	Develop an E&S risk and impacts screening procedure to the decision-making process for future acquisitions or development of new operations, businesses lines or material changes of existing operations to identify risks and propose mitigation measures as per IFC PS1.	Draft E&S Risks and Impacts Screening Procedure: 31 August 2021 Final E&S Risks and Screening Procedure: 30 September 2021	Draft E&S Risks and Impacts Screening Procedure: February 28, 2023	In progress Rescheduled	E&S risks and impacts screening procedure, acceptable to IFC.
1.4	Appoint dedicated staff to E&S management at all times at the corporate and project level and receive training as per legal requirements and applicable PS provisions. It includes the need of hiring, at the corporate level, an E&S officer reporting to the CEO, and a social specialist to be in charge of managing social performance, coordinating the relationship with the affected communities, coordinating the social impacts and risks assessment, and ensuring that social risks will be properly integrated in the ESMS at the corporate and projects level, as well as E&S coordinators and analysts for each operation. The company shall require the contractors to appoint the required E&S representatives.	Corporate E&S Officer hired: 31 August 2020 Corporate Social Specialist hired: 30 July 2021 E&S Team for each operation: 30 December, 2021	February 28, 2023	In progress Rescheduled	Corporate Social Specialist hired. E&S Team for each operation hired. Updated Organizational charts of each operation.
1.5	Develop a Contractor Management and Assurance Plan (CMAP) outlining the process of integration of corporate and project-specific environmental, social and health and safety (ESHS) requirements into bidding documents, tendering processes, evaluation of contractors and contractual obligations. This CMAP will reflect the principles, guidelines, commitments and requirements for EPC contractor and sub-contractor ESHS management to be rolled-out at the project level at each operation. This plan will include requirements for contractor audits and inspection programs, definition of KPIs, monitoring and reporting requirements.	North Operations: Draft CMAP: 30 December 2021 Final CMAP: 28 February 2022 South Operations: Draft CMAP: 30 June 2022 Final CMAP: 31 August 2022 Salt Project: Draft CMAP: 30 September 2022 Final CMAP: 30 November 2022	June 30, 2023	In progress Rescheduled	Submit the CMAP acceptable to IFC.
1.6	The company will train employees and contractors' workers on implementation of the Emergency Preparedness and Response Plans, and implement periodic drills, including contracted workers. Hidrovias will document its emergency preparedness and response activities, resources,	North Operations: 30 December 2021 South Operations: 31 August 2022	June 30 2023	Rescheduled	Copies of amended EPRPs acceptable to IFC. Evidence of disclosure of appropriate information on EPRP to Affected Communities.

ESAP Item ID	Required Action	Initial Due Date	New Due Date	Status	Completion Indicator(s)
	and responsibilities, and will disclose appropriate information to Affected Communities, relevant government agencies, or other relevant parties, according to a schedule which will be included in the EPRP.				
1.7	Develop and implement a Stakeholders Engagement Plan (SEP), following PS1 and PS7 requirements, based on a stakeholder analysis and mapping exercise. Under the coordination of the social specialist, Hidrovias will develop a stakeholder mapping for the current operations with a focus on identifying groups affected by the project (including air emissions, noise, terrestrial traffic, navigation, water quality, effluents, drainage, resource availability, land access, etc.), and specifically vulnerable groups such as indigenous peoples, elderly, persons with special needs, single headed households, etc. The SEP will ensure engagement and participation of all sectors of the local population and relevant civil society organizations, and include the following elements: (i) the company's and project description, engagement principles, objectives and criteria for stakeholder engagement; (ii) local regulations and IFC requirements; (iii) description of key social and environmental risks and impacts; (iv) summary of previous engagement activities and stakeholders' concerns; (v) identification, analysis and prioritization of stakeholders, focusing on those directly affected including vulnerable groups, traditional communities, IP groups and residents of the area of influence of the project; (vi) methods and tools to provide information to and consult with each stakeholder group, including women, men, youth, IPs and vulnerable people; (vii) action plans to be updated annually describing specific stakeholder engagement activities to be conducted by Hidrovias; (viii) description of Hidrovias's grievance mechanism and periodic dissemination of the various channels to raise grievances, ensuring their understanding by all stakeholders, and (ix) timetable, resources, and responsibilities. Through the implementation of the SEP, the company will provide information to stakeholders about project activities, environmental and social performance, impacts and mitigation measures, including those related to construction, O&M and decommissioning activities.	North Operations: Draft SEP: 29 October 2021 Final SEP: 30 December 2021 South Operations: Draft SEP: 29 April 2022 Final SEP: 30 June 2022 Salt Project: Draft SEP: 29 July 2022 Final SEP: 30 September 2022	March 31, 2023	In progress Rescheduled	Stakeholder map and Stakeholder Engagement Plan developed to satisfaction of IFC. Evidence of implementation in the annual monitoring report to IFC.
1.8	Develop and implement a Grievance Redress Mechanism with procedures and formats to: (i) receive and register external communications and grievances from the public through multiple	All Operations: 29 October 2021	January 31, 2023	Rescheduled	Grievance Redress Mechanism in place and disseminated to Affected Communities to satisfaction of IFC.

ESAP Item ID	Required Action	Initial Due Date	New Due Date	Status	Completion Indicator(s)
	channels; (ii) screen and assess the issues raised and determine how to address them; (iii) provide, track, and document responses; (iv) provide feedback to stakeholders on grievance mechanism results, and (v) monitoring implementation and effectiveness through key performance indicators (KPIs). The GRM will have specific provisions to report and address GBV complaints. The mechanism will be transparent, culturally appropriate and gender sensitive, and seek to resolve concerns promptly. Confidentiality will be ensured when requested by the person who raised the concern.				Register logs of each operation, submitted as part of the annual monitoring report to IFC.
2.1	Review and amend the internal grievance mechanism to include specific process and qualified staff to report and address sensitive complains such as gender-based violence and harassment (GBVH) ensuring confidentiality and using a survivor-centered approach. Periodically disseminate and communicate the internal GM procedure to address promptly and transparently workers concerns. The mechanism will allow for anonymous complaints and will be made available and will be broadly communicate to all Hidrovias's direct employees and contracted workers.	All Operations: 31 August 2021	January 31, 2023	Rescheduled	Workers Grievance Mechanism acceptable to IFC. Register logs of each operation, submitted as part of the annual monitoring report to IFC.
3.1	Conduct a GHG inventory of each operations that are expected to or currently produce more than 25,000 tonnes of CO2-equivalent annually, quantifying direct emissions from the facilities owned or controlled within the physical project boundary, as well as indirect emissions associated with the off-site production of energy used by the project. Quantification of GHG emissions will be conducted annually in accordance with internationally recognized methodologies and good practice, as per WBG EHS General and sectoral EHS Guidelines.	North Operations: 30 December 2021 South Operations: 29 July 2022 Salt Project: 29 July 2022		Completed	Annual GHG emissions inventory submitted as part of the annual monitoring report to IFC.
4.1	Retain a specialized firm to conduct a robust security risk assessment that considers risks to the company's assets, operations and personnel as well as risks to the local population from the company's security arrangement (including risks of gender based violence being perpetrated by security personnel and/or contractors). Based on the security risk assessment, develop a Security Management Plan with a strong focus on prevention of security incidents and full respect to human rights, including training to prevent gender-based violence against employees, contractors and communities.	Draft ToR: 30 July 2021 North Operations: Draft Security Risk Assessment: 29 October 2021 Final Security Risk Assessment: 30 November 2021 South Operations: Draft Security Risk Assessment: 29 April 2022	ToR: January 16, 2023 Draft Study: June 30, 2023	Rescheduled	ToR for the security risk assessment study approved by IFC. Submit Security Risk Assessments and Security Management Plans for each operation prepared by a qualified consultant, acceptable to IFC.

ESAP Item ID	Required Action	Initial Due Date	New Due Date	Status	Completion Indicator(s)
		Final Security Risk Assessment: 31 May 2022 Salt Project: Draft Security Risk Assessment: 29 July 2022 Final Security Risk Assessment: 31 August 2022			
7.1	Conduct an assessment of project impacts on Indigenous Peoples in the area of influence of at ETC Miritituba, including a process of informed consultation and participation (ICP), consistent with IFC PS7. Considering the project has been operational since 2016, if FPIC (free, prior and informed consent) is required based on the results of the study [as per IFC PS7 GN27], Hidrovias will facilitate a process with the Affected Communities of Indigenous Peoples to build consent in relation to the management, mitigation and compensation measures of identified impacts, and development programs to be implemented by the project.	Draft Study Report I: Oct 2021 Draft Study Report II: Feb 2022 Final Study: Jul 2022 Hidrovias, please align draft reports with ECI deliverables.	December 31, 2023	Delayed (due to the relevant authority) Rescheduled	Indigenous Peoples Study report including ICP and/or FPIC initial results and Management Program in form and substance acceptable to IFC.