Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 06/28/2019 | Report No: ESRSC00660

BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Brazil	LATIN AMERICA AND CARIBBEAN	P169140	
Project Name	Sao Paulo Aricanduva BRT Corridor		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Transport	Investment Project Financing	12/14/2020	3/30/2020
Borrower(s)	Implementing Agency(ies)		
Municipality of São Paulo	Municipality of São Paulo		

Proposed Development Objective(s)

The Project Development Objective is to improve inclusive public transport services delivery along the Aricanduva corridor in Sao Paulo.

Financing (in USD Million)	Amount
Total Project Cost	121.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

Aiming at improving public transport services delivery along the Aricanduva corridor in São Paulo, the Project will finance: (i) a 14-km Bus Rapid Transit line on Avenida Aricanduva, connecting Metro lines 3 and 15; (ii) Bus Rapid Transit operational control center; and (iii) institutional strengthening activities.

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]

The Project will support the implementation of the Aricanduva bus corridor, which was early proposed as part of the Master Plan and Mobility Plan of the Municipality of São Paulo (approved in 2014 and 2015, respectively). It is a segregated bus corridor with an extension of 14 kilometers. The implementation of the bus corridor will be complemented by civil works for the construction of bus terminals and bus stops as well as projects for lightening and traffic signaling, afforestation and gardening works, and improving pedestrian accessibility. The Aricanduva bus corridor will be located at the East Region of the city of São Paulo and will make the connection of this region with downtown São Paulo through radial links offered by metro, suburban railways, and monorail lines as well as other bus corridors. These different modals will be integrated through the municipal transportation policy of a single commuting ticket (Bilhete Único).

The corridor is expected to: (i) improve public transportation in the city of São Paulo and incentivize the use of public transportation instead of individual transportation, contributing to reduce greenhouse gas emissions; (ii) induce development in the East Region of the city and its urban densification; (iii) improve the access to downtown São Paulo and the South region, where job and employment opportunities are concentrated; and (iv) reduce family expenditures with transportation, reduce commuting time and improve quality of live. The Aricanduva Bus Corridor crosses urban areas characterized by low urban density and high levels of social vulnerability. About 370 thousand people live in the area of direct interference of the corridor and 50.8% of them show high and very high social vulnerability levels according with the São Paulo Index of Social Vulnerability (Fundação SEADE – IPVS, Índice Paulista de Vulnerabilidade Social).

Additionally, the Aricanduva Bus Corridor would also serve at least eight densely populated city districts, which house around 1,250,000 potential users of the system. The bus corridor will run through streets widely used by the collective public transportation system, with an average of 300,000 passengers per day during the week.

Civil works supported by the project include micro-drainage and drainage systems and paving of the streets crossed by the Aricanduva Bus Corridor, data transmission networks (installation of optic fiber networks), boarding platforms and bus terminals, an overpass and an underpass, a bicycle pathway and landscaping works (afforestation and gardening), vertical and horizontal traffic signaling, public lightening and a Center of Control of traffic within the corridor.

D. 2. Borrower's Institutional Capacity

The Brazilian process for environmental licensing of civil works by municipal, state or federal environmental agencies (according to their competencies) encompasses three steps: (i) issuance of the Previous Environmental Licensing; (ii) issuance of the Installation Environmental Licensing; and (iii) issuance of the Operation Environmental Licensing. Depending on the proposal's degree of complexity, the expected environmental and social impacts and the risk involved, different studies and assessments are required. Municipal environmental agencies are incumbent of licensing civil works in the urban transportation sector (CONAMA Resolutions 01/85 and 237/97, CADES Resolution 179/2016, and CONSEMA Normative Deliberation 01/2014). The Aricanduva Bus Corridor already received its Installation Environmental License from the Municipal Secretariat of Environment (SVMA).

In the Municipality of São Paulo, SVMA is responsible for: planning, ordering and coordinating activities to protect the environment in the municipality, defining criteria to contain degradation and environmental pollution. It maintains technical-scientific cooperation with state and federal agencies and entities related to the environment and, in compliance with the National Environmental System – SISNAMA, establishes criteria aimed at optimizing environmental protection within the Municipality of São Paulo. SVMA comprises the following departments: Department of Environmental Quality Control; Department of Environmental Education and Culture of Peace - Open University of the Environment and Culture of Peace; Department of Parks and Green Areas; Department of

Environmental Planning; Department of Decentralized Management; Department of Administration and Finance; and Department of Participation and Promotion of Public Policies.
Several thematic instances – such as: the Committee on Climate Change and Eco-Economics; Council of the Special Fund for Environment and Sustainable Development; Municipal Council for Environment and Sustainable Development; Municipal Commission for Sustainable Development Objectives; and many others – ensure civil society participation and social control of public policies in the environment and SVMA performance. But the most important is its previous experience with similar projects. The bus corridors already implemented by the City of São Paulo, which had their respective studies evaluated by SVMA teams and obtained the necessary licenses are: Inajar de Souza Corridor - 1991 (12Km); Pirituba / Lapa / Centro Corridor -2003 (12km); Parelheiros / Rio Bonito / Santo Amaro Corridor - 2004 (27 Km); Jardim Angela Corridor / Guarapiranga / Santo Amaro - 2004 (08 Km); Ibirapuera Corridor - 2004 (06 Km); and Expresso Tiradentes Corridor - 2007 (08 Km).
A team of specialists in the management of environmental and social risks and impacts will be assigned to the Project Management Unit and will be responsible for monitoring, overseeing, and reporting to the Bank about project performance and achievement of results consistent with the requirements of the relevant Environmental and Social Standards.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC) — Substantial

Environmental Risk Rating — Substantial

The Aricanduva bus corridor that will be implemented explores an important alternative to enhance public transportation. It will lead to significant gains to urban mobility in the city of São Paulo, where a high degree of traffic congestion is daily observed. Therefore, the expected environmental risks and impacts of project activities will be restricted to the sites where the works will occur. They are temporary, reversible, and can be mitigated by simple and well-known measures. The new bus corridor had already been assessed in the licensing process and a series of conditions where imposed to guarantee compliance with the national environmental legislation, which is fully aligned with Bank Environmental Social Standards 1, 3, 6 and 8. Even so, a review of the existing ESIA will be necessary and this will be the opportunity to ensure adequate coverage of the social and environmental aspects required by the ESF that may not be considered by the local/state/national regulatory framework. In spite of this, the environmental risk rating is considered substantial, given the context of the Project development, especially because of the weak experience of local government agencies with the Bank and the necessary institutional arrangements to deal with this.

Social Risk Rating — Substantial

The social risk rating is considered substantial because project activities will require the acquisition of a small number of plots of land (25). The Aricanduva bus corridor has the objectives of inducing development in the East Region of the city and its urban densification. Downstream implications of this process of development may include induced displacement and gentrification. These adverse downstream implications shall be considered, but the short- and medium-term overall impact of the project is mostly positive and mostly benefit low-income population, which rely the most on public transportation and will benefit from the envisaged reduction on commuting time and increased

access to more economically dynamic areas of the city. The client has shown strong capacity and commitment to deal with risks and potentially adverse impacts and downstream implications.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

An Environmental Impact Assessment (EIA) of the Aricanduva Bus Corridor has already been carried out as part of its environmental licensing process – following the Brazilian legislation. Its environmental viability has been confirmed and civil works can start as far some environmental and social programs (already defined) are implemented. The costs of these programs were estimated in 9.1 million Brazilian Reais.
The EIA concluded that environmental and social risks and impacts are of low magnitude. This assessment highlights the following environmental and social potential risks and impacts: soil erosion, increased soil sealing, soil contamination due to inadequate disposal of solid wastes and effluents, increased risk of soil contamination by fuels and lubricants during construction, risk of interference with contaminated areas, silting of watercourses and drainage during construction, risk of groundwater contamination during construction, alteration of air quality during construction and operation, reduction of vegetation cover in the directly affected area, interference in legally protected areas, an increase in the proliferation of undesirable species, an increase in the circulation of heavy vehicles in the local road network during construction, improvement in the collective transportation of passengers in the project's operation phase, real estate valuation, direct and indirect employment generation, compulsory displacement of economic activities, expropriation and involuntary resettlement, increase of local income, inconvenience during construction, increase of noise and vibrations, interruption of traffic and potential impacts on cultural heritage. Considering the three Project Components, this impacts and risks assessment is mainly related to Component 1, since Components 2 and 3, by their nature, are not likely to generate adverse environmental and social impacts.
Measures proposed for the management of adverse environmental risks and impacts include: (i) the implementation of an Environmental and Social Management Plan (ESMP), which will have a draft version prepared by appraisal; (ii) the creation of an environmental warning system to flag no compliance with environmental requirements of the civil works; and (iii) the hiring of an environmental supervision for the civil works.
The Previous Environmental License (LAP nº 04/SVMA.G/2013) was issued in December 27,2013 and the Installation Environmental License (LAI nº 13/DECONT-SVMA/2015) was issued in September 3, 2015 and is valid for four years. By Brazilian legislation, the revalidation of this license does not require a new Environmental and Social Impact Assessment, but a revision of the one initially prepared, updating its content in agreement with projects' latest versions. The ESIA will be reviewed during preparation to ensure it covers all the environmental and social aspects required by the ESF.
The draft ESMP may include: (a) a Civil Works Environmental Management Program, addressing the management of solid wastes, noise, emissions, and community and workers health and safety issues; (b) an Environmental Compensation Program, aimed to compensate for suppression of trees and intervention in Permanent Protected Areas (APPs); (c) Monitoring Programs for Synanthropic Fauna and Birdlife, (d) a Cultural Heritage Plan to be approved by IPHAN to deal with chances find cultural heritage during excavation works; (e) a Contaminated Area

Management Program aiming to avoid that workers and local communities are exposed to pollutants and hazardous materials; (f) a traffic management plan during construction; and (g) a Social Communication Program.
The implementation of such programs and plans is also a requisite for the issuance of the Operation Environmental Licensing.
The preparation of the ESMP according to the requirements of ESS 1 will be completed after executive project designs are finalized.

Areas where "Use of Borrower Framework" is being considered:

The Borrower Framework will not be used in replacement of ESS 1-10.

ESS10 Stakeholder Engagement and Information Disclosure

The Municipality of São Paulo has already drafted a robust strategy of stakeholder engagement and information disclosure to promote the contact between SPObras and the interested communities. This strategy takes into account the socioeconomic profile of the communities directly and indirectly affected by the civil works. The profile classified the key stakeholders in four groups: (i) Group A, composed by people and economic activities within the direct area of interference of the civil works; (ii) Group B, people and economic activities that are in the boundary of this area of interference; (iii) Group C, people and economic activities that will be indirectly affected by the civil works; and (iv) Group D, composed by the public institutions and civil society organizations (including community associations and informal leaderships within the area of influence of the Aricanduva bus corridor). Communication with these groups will be proportional to the degree of impact the civil works can cause to them.
This strategy of stakeholder engagement and information disclosure aims to establish channels of communication with these communities, including a specific channel for answering questions from the directly affected communities. The impacts and benefits expected from these works, the mitigation and compensatory measures, the obligations of implementing agencies and contractors will be properly and timely communicated to all key stakeholders. It will also carry out meaningful consultation rounds (as many as needed) for ensuring a participatory planning process, based on a previous identification of all key stakeholders and paying particular attention to people and economic activities that can be directly or indirectly affected by the civil works.
A team of social workers will be recruited and fully enrolled in continuous contact with the local population (household visits, workshops, etc.), paying special attention to those adversely affected by involuntary resettlement and ensuring that no incidents take place between the local population and the workers contracted for the civil works. The strategy sets quantitative targets that will be monitored and encompasses a beneficiary satisfaction assessment. These external communication and stakeholder engagement activities will be permanent throughout the lifetime of the project.
A further element of this strategy is the establishment of a Grievance Redress Mechanism, which will receive complaints in a social office to be locally established and through a toll-free phone number. Complaints will be responded within 20 days and emergencies will be responded within 48 hours. The GRM (and the people responsible for its operation and the channels for lodging complaints) will be announced in all communication materials produced and engagement activities carried by the Project.
Relevant information on environmental and social aspects and the progress of civil works will be made available through the official website of the São Paulo Municipality (www.prefeitura.sp.gov.br).
This already developed strategy will be further assessed during preparation to ensure that (i) it properly covers all the issues required in a Stakeholder Engagement Plan (as per the definition in ESS 10) and (ii) it can serve as the project's

Stakeholder Engagement Plan. Additional measures will be added as needed and the SEP will be prepared and disclosed prior to appraisal.
It is worth noticing that, in 2016 and 2017, SPObras carried out public audiences with the users of public transportation within the area that will be served by the Aricanduva Bus Corridor and the neighboring communities. They covered the key social and environmental impacts aspects in line with the ESF requirements. The feedback collected through these public audiences were incorporated in Project Design. The public audiences evidenced broad support to the Project. The strategy of stakeholder engagement and information disclosure to promote the contact between SPObras and the interested parties is a strategy of continued engagement with local communities and envisages regular meetings with them. Therefore, further consultations with the local communities will be held during preparation and implementation of the project.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

Project activities will include civil construction works that will be hired by the government of the city of São Paulo. Direct, contracted and primary supply workers will be protected under the Brazilian legislation, which is fully able to achieve outcomes consistent with the principles of ESS 2. All contractors will be required to comply with this legislation and ensure that all their contracted workers will be hired under formal labor relationships – meaning that labor agreements/management procedures shall be fully registered on their Labor Cards (Carteira de Trabalho) – the official Brazilian document for registering labor and working conditions. Formal registration of work and labor conditions in these Labor Cards ensures that workers will have access to social security, will have their worker's and labor rights respected, and will have access to retirement system/unemployment security. The client will be responsible to oversee these contracts and ensure they comply with the Brazilian labor legislation and the requirements of ESS 2.
The contractors will be required to organize and carry out daily dialogues about Health and Safety in the work place, also addressing regularly issues related with the conduct contracted laborers shall keep with the local population. These activities will be supervised by the social workers recruited for carrying out the stakeholder engagement and information disclosure activities. These procedures will be set in the Project's written Labor Management Procedures.

ESS3 Resource Efficiency and Pollution Prevention and Management

Due to its ability to coordinate many road corridors in the East Zone of the Municipality of Sao Paulo, the Aricanduva Corridor traditionally appears as one of the priority investments in mobility and has strong implications for reducing travel time. The denomination bus corridor adopted in Sao Paulo is applied to components of the road network in which traffic lanes are physically or geometrically segregated, liberating buses from the constraints imposed by general traffic, usually subject to slowness. Bus corridors give priority to buses without impeding the circulation of other modes of transport on tires. They have great attractiveness for passengers who will save commuting time. Bus corridors are expected to reduce the number of vehicles in circulation, to have positive medium-term impacts on the

economy of fossil fuels, to reduce emissions of both local pollutants and GHGs, and to improve air quality. The city of São Paulo has electric powered buses, hybrid buses and also got to test hydrogen powered vehicles. In the ESIA review, alternatives related to these different transport technologies will be assessed for use along the Corridor.

At the medium and long-term they may bring direct benefits to human health. These positive environmental and social impacts related with resource efficiency and pollution prevention are expected from the implementation of the Aricanduva Bus Corridor.
The revised ESIA will consider the use of energy and water by built infrastructure and assess the feasibility of using waste water at the facilities (bus stations, community infrastructure) to be built. Specific plans for the management of solid waste, hazardous waste, effluent and contaminated areas are already part of ESIA designed for licensing, but during the revision the team will ensure that these plans are also ESF compliant with respect to these aspects.
Another issue to be considered in the revised ESIA concerns to pesticides or chemical methods that may be used for the purpose of controlling urban pests during works in the corridor, which must follow ESS3 requirements.

ESS4 Community Health and Safety

During the implementation of civil works related with the Aricanduva Bus Corridor, some temporary, site-specific, and reversible adverse impacts may occur at the community level bringing risks to community health and safety. These risks are related with the increase in noise levels and production of debris; soil movement and consequent air pollution by particulate material; the increase in the circulation of trucks and machinery that can lead to traffic accidents and impair traffic and road safety; and the temporary influx of workers.
The client will ensure that structural elements will be designed and constructed by competent professionals and certifed or approved by competent authorities or professionals as required by ESS 4 and the Brazilian legislation and technical standards of Ministry of Labor. In addition and in compliance with the Brazilian legislation on accessibility, all structural elements and buses will ensure universal access of people with disabilities. All civil works will be efficiently signalized and fenceringed as also required by both ESS 4 and the country's regulatory framework. Vehicles and machinery will be operated by professionally trained drivers and operators. To ensure the fleet of vehicles and machinery have proper operating conditions, contractors will be required to conduct periodical technical inspections. The client will also monitor and report to the Bank any incidents and accidents. A Social Communication Plan will be carried out, ensuring that local population becomes aware of safety procedures and about emergency preparedness and response measures that need to be followed.
During project preparation and conclusion of executive project designs, the team will ensure that relevant issues during the operational stage – such as: trenching and flooding risks, road and driver safety, pedestrian and biker safety, response to emergencies and accidents, and prevention of gender-based violence, among others – will be discussed with the client and properly taken into consideration.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The project will require and support (with counterpart funds) the land acquisition needed by the civil works of improvement of the street system and widening of the roads. A Land Acquisition Plan has been prepared in late 2016 and will be updated. The previous assessment identified the need of a small number of land acquisitions. In total, it

was identified that 25 real estate properties (comprising a total area of 2,200 square meters and including a few public areas municipally and federally owned) would be partially affected. The Municipal Secretariat of Urban Infrastructure and Works (SPObras) – and its Land Acquisition Department will be responsible for carrying out these land acquisition processes. It holds an extensive experience with these processes. Its capacity will be assessed during project preparation. Expenses with land acquisition were estimated in 21.5 million Brazilian Reais (nearly 8 percent of the project value). The Municipal Decree of Public Utility – the legal document required for starting the process of land acquisition by the municipality of São Paulo – has already being approved. The updating of the Land Acquisition Plan and its implementation will comply with the requirements of ESS 5.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

This Standard is relevant especially because of the possible interferance with permanent preservation areas (APPs), which are object of specific legal regulation, and because the Aricanduva Bus Corridor borders an environmental protected area, the Municipal Natural Park Fazenda do Carmo – PNMFC. The corridor is located in a valley bottom, next to a water course that, despite having its banks much altered, without the original vegetation, is still an APP. The cited Municipal Park, on the contrary, is a remnant of secondary vegetation in an advanced stage of regeneration, which provides habitat for representatives of the fauna (especially birds). Therefore, although the Project will be developed in an urban environment highly modified, its necessary to promote sustainable management of living natural resources. The ESIA already discusses measures for the park protection and potential impacts induced by the implementation of the corridor. Also, the fact that environmental licensing is at an advanced stage brings more security in relation to the commitment related to the application of the mitigation hierarchy.

The current version of the engineering projects includes all the recommendations of the licensing process and provides resources needed to obtain environmental permits for vegetation management as well as intervention in Permanent Preservation Area - APP, following pertinent environmental legislation (Federal Law 12,651/2012). Funds for environmental compensation will be applied in the PMNFC protection, which is considered as a potential mitigation measure, as this park must be protected from possible invasion, impacts on its buffer zone or increased access and use of the area.

Other possible compensation for adverse environmental impacts will be applied preferentially on the intervention areas (Avenida Aricanduva and its zone of influence), or in areas indicated by the licensing agency. The environmental authorizations generate environmental commitments agreed in the Environmental Commitment Term, defined by the competent agencies, always seeking to compensate environmentally for adverse impacts in the city, resulting from vegetation management or intervention / soil waterproofing of protected areas. The environmental compensations will be fulfilled through compensatory planting and execution of services and improvement works in parks or other public environmental areas. The environmental commitment documents may also require transplantation and compensatory tree planting to be maintained for a period ranging from 6 months to 2 years, depending on the specimen planted. This care will guide the contracting of adequate services for the correct planting, related to the magnitude of the works.

A synanthropic fauna (insects, rats, scorpions) monitoring program is planned, which includes actions to control and track the harmful species that, especially in urban environments object of these kind of interventions, can spread in the areas located around the works, causing disorders and health problems to the population. If pesticides or chemical methods are to be used for the purpose of controlling these pests, the team will ensure that the ESIA will be reviewed in light with ESS6 and ESS3 requirements. There is also a proposed program to monitor avifauna that

includes actions to observe activities of the birds identified in the project region, which will be affected by the loss of trees, but also after the realization of compensatory plantations.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

No Indigenous Peoples (possessing the four characteristics set in ESS 7, paragraph 8) are present within the areas of direct and indirect influence of project activities.

ESS8 Cultural Heritage

Brazilian legislation on cultural heritage is fully aligned with the objectives proposed by this standard. It ensures the protection of cultural heritage from the negative impacts of project activities and supports their preservation. The IPHAN (Instituto do Patrimônio Histórico e Artístico Nacional) is the Brazilian agency responsible for this work. Because of a more advanced licensing process, a program of historical and archaeological patrimony monitoring, already approved by IPHAN, includes the monitoring of the works by an archaeologist in areas in which potential to find trace elements of historical and prehistoric archaeological findings is identified. Part of the program includes the development of patrimonial education actions, to be applied in the areas where the works have direct influence. The licensing process of the Aricanduva Bus Corridor requires the identification and monitoring of cultural heritage. The requirements of ESS 8 would be considered in all civil works and the Project EMSP will include a session establishing the requirements that are common to ESS 8 and IPHAN's normative. This session will address the procedures set by IPHAN to deal with: chance finds; stakeholder consultation to determine whether disclosure of information regarding cultural heritage could compromise or jeopardize its safety or integrity and to allow continued access to the cultural site by its users; and how to protect archeological sites and materials, built heritage, natural features with cultural significance and movable cultural heritage.

ESS9 Financial Intermediaries

The project will not involve Financial Intermediaries.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

This policy is not triggered because the project will not affect any international waterways as defined under the policy.

OP 7.60 Projects in Disputed Areas No

not applicable

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered? No

Financing Partners

There will be no financing partners in this operation.

B. Proposed Measures, Actions and Timing (Borrower's commitments)

Actions to be completed prior to Bank Board Approval:

The client will prepare in agreement with the Bank and in consultation with key stakeholders: (i) an environmental and social impact assessment (based on the studies developed for the licensing process), (ii) a draft Environmental and Social Management Plan, and (iii) a Stakeholder Engagement Plan. An Environmental and Social Commitment Plan (ESCP) will also be agreed between the client and the Bank. The client will also assign the team responsible for the management of environmental and social risks and impacts of the Project.

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

After completion of executive project designs, the final Environmental and Social Management Plan (ESMP) will be prepared and presented to the Bank before the beginning of all civil works. In compliance with the requirements of the ESF as well as the licensing process, this ESMP shall include the following programs: (i) environmental compensation, (ii) landscaping and afforestation, (iii) identification and monitoring of cultural heritage, (iv) monitoring of environmental quality, (v) environmental oversight of civil works, (vi) social communication and environmental education, (vii) land acquisition and (viii) a traffic management plan during construction.
The updated version of the Land Acquisition Plan (complying with the principles and requirements of ESS 5) will be presented to the Bank, publicly consulted and implemented before the beginning of the civil works.
The Stakeholder Engagement Plan will be implemented throughout the life of the Project.
Finally, the ESCP will define the periodicity of the presentation of progress reports addressing the management of environmental and social risks and impacts of the Project.

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS 25-Oct-2019

IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Municipality of São Paulo

Implementing Agency(ies)

Implementing Agency: Municipality of São Paulo

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

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Practice Manager (ENR/Social)	Valerie Hickey Recommended on 26-Jun-2019 at 21:23:0 EDT
Safeguards Advisor ESSA	Noreen Beg (SAESSA) Cleared on 28-Jun-2019 at 12:38:7 EDT