



# Concept Environmental and Social Review Summary

## Concept Stage

### **(ESRS Concept Stage)**

Date Prepared/Updated: 10/12/2022 | Report No: ESRSC02718



**BASIC INFORMATION**

**A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
Brazil	LATIN AMERICA AND CARIBBEAN	P178888	
Project Name	Brazil Climate Finance Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Finance, Competitiveness and Innovation	Investment Project Financing	8/23/2022	12/8/2022
Borrower(s)	Implementing Agency(ies)		
Banco do Brasil	Banco do Brasil		

Proposed Development Objective

To support Brazil’s achievement of its mitigation outcomes through the expansion of sustainability-linked finance and strengthening capacity to access carbon credit markets.

Financing (in USD Million)	Amount
<b>Total Project Cost</b>	<b>1896.00</b>

**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]**

The proposed project seeks to support Brazil’s mitigation outcomes through the expansion of sustainability-linked finance and strengthening capacity to access carbon credit markets in partnership with Banco do Brasil (BB), a large commercial bank with significant strength in financing activities with key mitigation potential. This is a financial intermediary (FI) project where the Bank is supporting a credit entity (BB) to fund clearly defined FI subprojects. It seeks to offer an integrated package of financing and TA to attract investors and firms committed to achieve mitigation outcomes through sustainability-linked finance and carbon markets.

The project comprises two components:



Component 1: Expanding access to sustainability-linked finance. This component aims to support Brazil's climate mitigation outcomes through the expansion of sustainability-linked finance through a sustainability-linked credit line and a climate debt fund.

Component 2: This component would provide technical assistance to Banco do Brasil to develop solutions that reduce the high transaction costs of creating high-quality carbon credits and to increase access to carbon credit markets.

#### D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The project will have a national scope. BB holds 800,000 clients in the SMES segment and 269,000 clients in the agribusiness segment spread all over the country. The project has the target of financing 25,000 subprojects for infrastructure projects and for the agricultural sector with the potential to generate carbon credits or reduce GHGs. Brazil is a critical player for mitigating global climate change in view of its size and potential for carbon sink and removal. Brazil carbon footprint has been growing over the past ten years, with GHG emissions rising by 2.3 percent annually on average, making it one of the top ten global emitters by virtue of its size. In 2018, it contributed 2.9 percent of global net Green House Gas (GHG) emissions. By 2020, Brazil accounted 2.16 billion tCO<sub>2</sub>e gross emissions. Its emissions growth is dominated by land use change and forestry (LUCF) and it is ranked second in the world in terms of net emissions from these sectors as Brazil's institutional framework for environmental sustainability faces important difficulties in implementing and enforcing measures against deforestation. Much of this LUCF emission is coming from the Amazon, a globally important carbon sink of which 60 percent is in Brazil as well as from the deforestation of the Cerrado biome (an agricultural powerhouse). In 2020, LUCF were the largest emitters, accounting for 998 million tCO<sub>2</sub>e (or 46 percent of the total country emissions). In the same year, agriculture and cattle raising accounted for 577 million tCO<sub>2</sub>e (27 percent). Brazil's energy sector came in third place (nearly 394 tCO<sub>2</sub>e and 18 percent) largely because of the significant share of renewables in the country's energy matrix (18 percent), whereas industrial processes and wastes were relatively smaller gross emitters (100 and 92 million tCO<sub>2</sub>e, respectively). Brazil's NDC program target of a 50 percent reduction in GHG emission reductions from 2005 levels by 2030 translates into 1.28 GtCO<sub>2</sub>e. Also, the Country has committed to become net-carbon neutral by 2050. However, to meet its NDC and realize its potential for carbon removal, Brazil needs an acceleration in market-based financing. Brazil's participation in voluntary carbon credit markets amounted to only 3.6 percent of the global voluntary marketing (equivalent to \$ 1.2 billion) by the end-2021. The country has the potential to increase this share to 10 percent by 2030, driven by the forest sector. These levels of generation of carbon credits could generate revenues close to at least US\$ 100 billion or higher. This revenue generation potential could be harnessed by the strengthening of a robust carbon finance market in Brazil, and its linkages to the global carbon markets.

Brazil is also pointed out as one of the countries with the greatest potential for the development of the Voluntary Carbon Market in view of its rich biodiversity, conserved areas, and potential for renewable energy. This market is dominated by Energy projects (63%), followed by projects in Agriculture, Forestry and Other Land Uses (25%). But the regulatory framework for carbon markets is still under development, posing risks around the integrity of its carbon credits in the absence of well-defined domestic standards and regulatory uncertainty that could affect demand in the market. The Central Bank has put a strong focus on reducing Brazil's carbon footprint and the momentum it has built in adopting strong regulations for making the financial sector more environmentally and socially sustainable through,



for e.g., tighter reporting and more systemic climate risk assessment. A proposed Bill for establishing the Brazilian Emissions Reduction Market and regulating carbon credits transactions is currently under discussion by the Chamber of Deputies and listed as a priority legislation for this calendar year. It would regulate critical aspects of the voluntary market, including its standards, and propose the introduction of a compliance market.

#### D. 2. Borrower's Institutional Capacity

The BB was founded in 1808 and is the first financial institution listed in the Brazilian Stock Exchange. In September 2021, there were more than 862 thousand shareholders. It has 3,977 branches and is present in 96.6% of the Brazilian municipalities. It has 75.3 million customers. The expanded loan portfolio reached 814.2 billion Brazilian reais (circa of USD162 billion), split between individuals (31 percent), agribusiness (28 percent), small and medium size companies (11 percent), corporations (18 percent) and Government (7 percent). BB's sustainable loan portfolio reached 282.1 billion Brazilian Reais (35 percent) distributed between social loans, best socioenvironmental practices, low carbon agriculture and companies. Loans to renewable energy reached 7.4 billion Brazilian Reais; investments in environmental, social and governance funds equaled 4.4 billion Brazilian Reais; and Green Commercial Papers captured 158 million reais in three months.

BB's policies and processes incorporate increasingly demanding central bank regulations on responsible social, environmental and climate policies (Resolution 4,327/14, Ordinance 3,846/2017 and 2021 requirement on the use of the global TCFD standards). BB's operations also incorporate a range of voluntary practices. BB has been a signatory to the Equator Principles since 2005 and adheres to the IFC's Performance Standards on Environmental and Social Sustainability and the World Bank Group's General Environmental, Health and Safety (EHS) Guidelines.

Since 2005, BB has enacted policies and plans to reduce negative environmental and social impact of its lending portfolio. BB has had formal Sustainability Plans since 2008 updated every two years. Now in its eighth version, BB's Sustainability Plan (Agenda 30 BB 2021-2023) contains 10 Long-Term Commitments to 2030 under three blocks: Sustainable Businesses, Responsible Investment and ESG and comprises 40 actions. BB's Board of Directors approved a Socio-Environmental Responsibility Policy (the "Policy") in December 19th, 2019 and BB has developed Sustainability Credit Guidelines for Loans (the "Guidelines") that comprise a set of 52 guidelines and applies to the concession of loans to ten sectors – Agrobusiness, Irrigated Agriculture, Civil Construction, Cement, Energy, Mining, Oil & Gas, Transportation, Pulp & Paper, and Steel. These Guidelines focus on four key thematic areas and call attention to 14 relevant socio-environmental issues. They list Excluded Activities, Restricted Activities, and Alert Activities.

BB's organizational structure encompasses a Risk and Capital Committee approved in 2017 by the Board of Directors that is responsible for advising the Board of Directors on the approach to risk management (including environmental and social risks). It also includes two units directly related with sustainability issues: one directly linked to the CFO for dealing with corporate sustainability issues and another for environmental and social risk management in its credit operations under the Risk Management Board that is responsible for the implementation of BB Socioenvironmental Responsibility Policy.

The objective of these socio-environmental risk management structures is to identify, measure, evaluate, monitor, report, control and mitigate social risks resulting from impacts on the well-being of the stakeholders as well as the environmental risks related to the possibility of harmful effects caused by BB financed operations. Credit analysis is conducted by HQ-based specialists not linked to local loan officers. Financing contracts include clauses to accelerate repayment and stop disbursement in case of infringements.

Prior to appraisal, further due diligence will be conducted on the numbers and qualifications of staff assigned to ES risk management.



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

A. Environmental and Social Risk Classification (ESRC)

Substantial

Environmental Risk Rating

Substantial

Investments aiming at the reduction of GHG emissions and climate change mitigation in a broad range of issues usually have environmental and social co-benefits but may also bring potential adverse impacts. Voluntary Carbon Markets and GHG emission reduction measures aiming climate-change mitigation affect socio-economic and environmental systems beyond the activities that directly produce carbon credits. In a broad range of issues, both the voluntary carbon markets and the GHG emission reduction measures, in general, have been associated by the international literature with a variety of environmental and social co-benefits as well as potential adverse side-effects. An important co-benefit of mitigating GHGs is the prevention of negative impacts on ecosystems, including biodiversity loss, ocean acidification, soil degradation, water pollution, and the loss of other ecosystem services. Ecosystem co-benefits include reductions in biodiversity losses and soil erosion through an increase in forest-based carbon sequestration, increases in resource efficiency through water and other natural resources conservation, improved energy efficiency and increased resources reutilization. The literature associates GHG reduction measures to positive impacts on biodiversity as they can promote conservation of biological diversity and save endangered animals both by reducing deforestation, or by using reforestation/afforestation to restore biodiverse communities on previously developed farmland. However, they can sometimes have some adverse side-effects and reduce biodiversity when they promote land-use changes such as the planting monocultures on biodiversity hot spots. The literature also associates GHG emission reduction measures to positive impacts on water resources (water yields and water quality) as various measures contribute to prevent the contamination of local drinking water sources and to reduce flood peaks, erosion and efflux of silt. Nevertheless, it also highlights that various types of GHG emissions reduction in the AFOLU sector can be associated with the degradation of water sources (through the losses of pesticides and nutrients to water) as well as to water shortages (where irrigation water is used to produce bioenergy crops or in some forest plantations). One of the risks faced by project relates to the remote possibility that the capitalization of the rural MSMEs producers – due to the increased productivity and profitability of its production – leads to the opening new areas or to indirect impacts on adjacent permanent protection areas with potentially negative impacts on habitats natural and forests. Furthermore, the implementation of low carbon production systems (such as cattle raising-forestry, cultivation-cattle raising-forestry integration systems, the implementation, maintenance and management of planted forests, and the appropriate disposal of waste) may require the initial and temporary use of pesticides and herbicides for pest control at subproject sites, which generates the risk of the excessive application of inputs with inappropriate levels of toxicity and following non-recommended procedures. Finally, potential support to MSMEs investing on forest plantations may lead to the establishment of monocultures over large areas of the landscapes, increasing the risk of attacks by pests and pests, which could compromise the entire plantation and would be exacerbated where the plantations advance into sensitive sites (e.g., wetlands or high-slope sites). However, the low-carbon and climate smart technologies to be fostered by the project are more environmentally sustainable than conventional production practices, can contribute to conservation and recovery of natural habitats under private properties and may counteract some of the widely documented and well known direct drivers of GHG emissions associated with the AFOLU sector.

Social Risk Rating

Substantial

Public Disclosure



Social co-benefits derive from the reduction of air pollution, which are often associated to improvements in public health outcomes (reduction in mortality, morbidity, increased prevalence of diseases, and/or increased health costs). Low-income people who depend on agriculture and weather patterns to earn a living are conceived of as most vulnerable to climate change impacts, and equity issues have also been a central consideration of the international literature, where some climate change mitigation measures – such as carbon taxes – have been pointed out as a driver that can make lower income groups being more affected if the tax revenue is not well used. Technological innovation, food security (due to more effective land use in impoverished areas), and energy security (by expanding the energy portfolio through low-carbon technologies and energy-efficiency improvements) have also been pointed out as other co-benefits of climate change mitigation efforts. Major social concerns emerging are usually related with land tenure, land possession rights, displacement of social groups, the livelihoods and food security of several disadvantaged and vulnerable social groups (including Indigenous Peoples, Forest-dependent communities, and other social groups). and the distributional impacts of GHG emission reduction measures in the AFOLU sector. Co-benefits can be clarification of land tenure arrangements, harmonization of rights and measures that increase food production and availability (e. g., agroforestry, intensification of agricultural production, or integrated systems). Adverse side-effects are related with a potential negative impact on the already fragile status of the land and resource tenure rights of Indigenous Peoples and forest-dependent communities as well as with the potential reduction of food production at least locally. Positive or negative outcomes are often considered as a function of the institutions regulating land tenure and land-use rights and the level of enforcement by such institutions and related with stakeholder engagement (as there is a risk of disenfranchising local livelihoods and creating perverse economic incentives when stakeholders are neglect). Although Indigenous peoples and traditional communities may not benefit directly of the financed activities, they may be able to derive co-benefits from project supported activities, which are related with the reduction of pressure for converting new native forest areas, the protection of headwaters and riparian zones, the improvement of the physical, chemical and biological conditions of the soil, the reduction of water and soil pollution, and the better conservation of natural resources on which their livelihoods hugely rely. Furthermore, the Project will operate on an institutional scenario where there are robust provisions regulating land rights of Indigenous Peoples and other traditional communities.

## **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:***

This project is a financial intermediary (FI) project where the Bank is supporting a credit entity. The Project targets BB's clients operating in sectors that contribute the most to Brazil's carbon footprint (such as: agriculture and livestock, land use/forestry, transport, or energy). The ESF does not apply to any part of the Project. Rather, the World Bank Performance Standards (PSs) apply to entire project since the proposed project is a private-sector project and Banco do Brazil (BB) is deemed to be a private sector entity, for purposes of the application and the criteria set out in OP/BP 4.03, which applies to Bank supported projects that are designed and operated by a private entity, productive and necessary to meet the development objectives of the member country in which they are implemented. OP/BP 4.03 ("Performance Standards for Private Sector Activities") will be applicable to the project in lieu of the World Bank's Environmental and Social Standards. OP/BP4.03 is better suited for this project given that it



will finance private sector activities and is executed through Bank of Brazil (BB), which is a commercial sector financial institution. The project is categorized as FI-2 in accordance with OP/BP4.03.

**Areas where “Use of Borrower Framework” is being considered:**

None.

**ESS10 Stakeholder Engagement and Information Disclosure**

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**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**

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**ESS3 Resource Efficiency and Pollution Prevention and Management**

This project is a financial intermediary (FI) project where the Bank is supporting a credit entity. The Project targets BB’s clients operating in sectors that contribute the most to Brazil’s carbon footprint (such as: agriculture and livestock, land use/forestry, transport, or energy). The ESF does not apply to any part of the Project. Rather, the World Bank Performance Standards (PSs) apply to entire project since the proposed project is a private-sector project and Banco do Brazil (BB) is deemed to be a private sector entity, for purposes of the application and the criteria set





out in OP/BP 4.03, which applies to Bank supported projects that are designed and operated by a private entity, productive and necessary to meet the development objectives of the member country in which they are implemented. OP/BP 4.03 (“Performance Standards for Private Sector Activities”) will be applicable to the project in lieu of the World Bank’s Environmental and Social Standards. OP/BP4.03 is better suited for this project given that it will finance private sector activities and is executed through Bank of Brazil (BB), which is a commercial sector financial institution. The project is categorized as FI-2 in accordance with OP/BP4.03.

#### **ESS4 Community Health and Safety**

This project is a financial intermediary (FI) project where the Bank is supporting a credit entity. The Project targets BB’s clients operating in sectors that contribute the most to Brazil’s carbon footprint (such as: agriculture and livestock, land use/forestry, transport, or energy). The ESF does not apply to any part of the Project. Rather, the World Bank Performance Standards (PSs) apply to entire project since the proposed project is a private-sector project and Banco do Brazil (BB) is deemed to be a private sector entity, for purposes of the application and the criteria set out in OP/BP 4.03, which applies to Bank supported projects that are designed and operated by a private entity, productive and necessary to meet the development objectives of the member country in which they are implemented. OP/BP 4.03 (“Performance Standards for Private Sector Activities”) will be applicable to the project in lieu of the World Bank’s Environmental and Social Standards. OP/BP4.03 is better suited for this project given that it will finance private sector activities and is executed through Bank of Brazil (BB), which is a commercial sector financial institution. The project is categorized as FI-2 in accordance with OP/BP4.03.

#### **ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

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#### **ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

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productive and necessary to meet the development objectives of the member country in which they are implemented. OP/BP 4.03 (“Performance Standards for Private Sector Activities”) will be applicable to the project in lieu of the World Bank’s Environmental and Social Standards. OP/BP4.03 is better suited for this project given that it will finance private sector activities and is executed through Bank of Brazil (BB), which is a commercial sector financial institution. The project is categorized as FI-2 in accordance with OP/BP4.03.

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

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#### **ESS8 Cultural Heritage**

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#### **ESS9 Financial Intermediaries**

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implemented. OP/BP 4.03 (“Performance Standards for Private Sector Activities”) will be applicable to the project in lieu of the World Bank’s Environmental and Social Standards. OP/BP4.03 is better suited for this project given that it will finance private sector activities and is executed through Bank of Brazil (BB), which is a commercial sector financial institution. The project is categorized as FI-2 in accordance with OP/BP4.03.

**C. Legal Operational Policies that Apply**

**OP 7.50 Projects on International Waterways** No

**OP 7.60 Projects in Disputed Areas** No

**III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE**

**A. Is a common approach being considered?** No

**Financing Partners**

None.

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

**Actions to be completed prior to Bank Board Approval:**

In compliance with OP/BP 4.03, BB will provide the information furtherly needed for the assessment of its Environmental and Social Management System (ESMS). This information refers to BB’s (a) the procedures that are in place for (i) screening and assessing risks and impacts of subprojects or individual loan transactions and (ii) monitoring environmental and social performance of the portfolio of subprojects and providing periodic progress reports to BB senior management; and (b) BB’s organizational capacity to implement the ESMS (human and finance resources).

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

Adaptations that may be required as identified by the in depth review the adequacy of BB’s Environmental and Social Management System (ESMS) to address Environmental and Social risks not covered by its Guidelines and/or enhance the institutional capacity to carry out its Environmental and Social due diligence.

**C. Timing**

**Tentative target date for preparing the Appraisal Stage ESRS** 24-May-2022

**IV. CONTACT POINTS**

**World Bank**

Contact: Shireen Mahdi Title: Lead Country Economist

Public Disclosure



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**Borrower/Client/Recipient**

Borrower: Banco do Brasil

**Implementing Agency(ies)**

Implementing Agency: Banco do Brasil

**V. FOR MORE INFORMATION CONTACT**

The World Bank  
 1818 H Street, NW  
 Washington, D.C. 20433  
 Telephone: (202) 473-1000  
 Web: <http://www.worldbank.org/projects>

**VI. APPROVAL**

Task Team Leader(s):	Gabriel J D Sensenbrenner, Shireen Mahdi, Renato Nardello
Practice Manager (ENR/Social)	Maria Gonzalez de Asis Recommended on 23-May-2022 at 22:27:23 GMT-04:00
Safeguards Advisor ESSA	Marco Antonio Zambrano Chavez (SAESSA) Cleared on 12-Oct-2022 at 10:11:27 GMT-04:00

Public Disclosure