

**CMPC Guaíba - Environmental and Social Action Plan
(Version 29-10-13)**

This document may suffer some changes until the day the Loan Agreement is signed.

#	Item/ issue	Actions	Deliverables and verification	Time line	Responsible person/ function at CMPC
All Project Components					
1	Environmental and Social Assessment, Management and Monitoring Systems	<ol style="list-style-type: none"> 1. Implement the (PBA¹) action plan for the mill. 2. Based on the license renewal and to the development of a PBA, develop and implement a GCA² which covers all the environmental and monitoring programs presented in the EIA and also include the follow-up of all the construction works for the installation of the industrial units and their corresponding control equipment, the port expansion, and additional works conducted as part of this license. 	Updated PBA and GCA and related documentation to be reviewed and reported by independent monitoring consultant to the ECAs and Banks in connection with the consultant's 1st, 2nd and 3rd monitoring visit.	CMPC to confirm time lines for PBA and GCA and related documentation.	Environmental and Quality Manager
2	Environmental and Social Assessment, Management and Monitoring Systems	<p>Incorporate the Project into the Integrated Management System (IMS) to be implemented to construction and operational phases</p> <p>ISO 14001 certification of CMPC's (Guaíba) Integrated Management System (IMS)</p>	Independent monitoring consultant to verify status of the IMS development during the consultant's 1st, 2nd and 3rd monitoring visit. CMPC to report to lenders when ISO 14001 certification has been achieved.	Certification two years after start-up of Line 2 production.	Environmental and Quality Manager

¹ Projeto Básico Ambiental (Action Plan)

² Gerenciamento de Condicionantes Ambientais (environmental follow-up program during the construction phase)

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Guaíba 2 Project Component: Line 2 and Extension of Line 1					
3	Environmental and Social Assessment, Management and Monitoring Systems	Adequate human resources in place at CMPC to monitor and manage the EPC contractors', sub-contractors' and suppliers' environmental, health and safety, labour and social performance related to construction of the new Line 2 and to require and follow up of corrective actions by such parties when non-compliances with their contract requirements are observed.	Independent monitoring consultant to review the adequacy the human resources and to report to lenders during the consultant's 1 st , 2 nd and 3 rd monitoring visit.	On-going activity	Environmental and Quality Manager
4	Monitoring and reporting requirements of EPC Contractors	<ol style="list-style-type: none"> 1. Finalize and take into action i) CMPC's procedure of processing of non-compliances caused by EPC contractors, sub-contractors and suppliers (non-compliances can be observed e.g. by CMPC, environmental supervision team of Polar Engenharia Ambiental, such contractors or local stakeholders), ii) CMPC's monitoring of such contractors, sub-contractors and suppliers and iii) communicating with such parties about non-compliances observed and iv) following up of closure of non-compliances. 2. Ensure that EPC Contractors, sub-contractors and suppliers comply with environmental, health and safety, labour and social conditions of their contracts related to construction of the new Line 2 and local communities. 	Independent monitoring consultant to review the actions and to report to lenders during the consultant's 1 st and 2 nd monitoring visit.	On-going activity during the construction period.	Environmental and Quality Manager

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		3. Define reporting requirements from contractors to CMPC regarding their environmental, health and safety, labour and social performance and closure of observed non-compliances 4. Ensure EPC contractors have enough resources to monitor and manage their environmental, health and safety, labour and social performance against their contractual requirements. 5. Ensure that requirements above also apply to: <ul style="list-style-type: none"> - Port and Dredging Maintenance Operations - Transmission line construction - New road construction. 			
6	Stakeholder Engagement and Public Consultation	CMPC to implement and develop further the Integrated Stakeholder Engagement Plan encompassing all components of the project.	Independent monitoring consultant to verify action to lenders during the consultant's 1st monitoring visit.	Integrated Stakeholder Engagement Plan in operation before the 1 st monitoring visit by	Communication and Relationship Manager

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				the independent consultant.	
7	Noise management	<p>Investigate by simulation model, whether compliance with the IFC noise limits (55 dB(A) during day time and 45 dB(A) during night time) could be reached at sensitive receptors by implementing additional noise abatement measures during construction and operation phases. Estimate cost of such measures. In case of unreasonable costs for abatement measures agreed with the ECAs and Banks about acceptable noise ('Agreed noise limits') limits and noise abatement measures.</p> <p>Monitoring and analyzing of noise levels in the local community during construction and operation in accordance with IFC methodology.</p> <p>If needed, implement additional noise abatement measures to comply with the Agreed noise limits.</p>	<p>1. CMPC to inform the ECAs and Banks about results of the simulation model regarding the IFC noise limits, additional noise abatement measures and resulting noise levels in the local community.</p> <p>2. Monitoring consultant to verify implemented noise abatement measures and report noise levels in the local community to the lenders.</p>	<p>1. End of February 2014</p> <p>2. Independent consultant's 1st and 2nd monitoring visit.</p>	Project Manager
8	Community Health and Safety;	Ensure that health and safety aspects of neighboring communities will be taken into account during the project	Community health and safety aspects taken into account in CMPC's plans and operations at	HAZOP by end of Decemb	Project Manager

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	Chemical Storage, Use and Transport	lifecycle. Finalize the HAZOP ³ for the whole pulp mill.	Guaíba site. Finalized HAZOP for the pulp mill for CMPC's use. Independent monitoring consultant to verify action to lenders during the consultant's 1st monitoring visit.	er 2013.	
Guaíba 2 Project Component: Plantations					
9	Community Health and Safety (<i>Timber and Hazardous Materials Transportation</i>)	Ensure that health and safety aspects of neighboring communities are taken into account during the project lifecycle, including timber and hazardous materials transportation. The communities to be taken into account include both the neighboring communities to the plantation areas as well as to the transportation routes. Specific focus should be given such aspects (community size, location etc.) which may have changed since the original EIAs were done.	Community health and safety Aspects of timber and hazardous materials transportation taken into account in CMPC's and contractors' plans and operations. Independent monitoring consultant to review the issues described in this action in connection with the consultant's 1st, 2nd and 3rd monitoring visit.	On-going activity.	Environmental Forest Coordinator

³ Hazard and operability study