

Fundo Brasileiro para a Biodiversidade (FUNBIO)

Promoting Community-led Production Inclusion and Sustainable Development of Quilombola Territories (P516557)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

Negotiated Version

2 July 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Fundo Brasileiro para Biodiversidade - FUNBIO (the Recipient) will implement the Promoting Community-led Production Inclusion and Sustainable Development of Quilombola Territories Project (the Project), with the involvement of the Ministry of Racial Equality (MIR), as set out in the Grant Agreement (the Agreement). The International Bank for Reconstruction and Development (the Bank), acting as the Accredited Entity of the Green Climate Fund, has agreed to provide financing for the Project, as set out in the Agreement.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Bank. The ESCP is a part of the Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Bank. Said E&S documents may be revised from time to time with prior written agreement by the Bank. As provided for under the referred Agreement, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Bank and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Bank and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Recipient's Representative specified in the Agreement or CEO of the Recipient. The Recipient shall promptly disclose the updated ESCP.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	ORGANIZATIONAL STRUCTURE Complement and maintain the existing PMU with qualified staff and resources to support management of environmental, social, health and safety (E&S) risks and impacts of the Project, including a Social Specialist and an Environmental Specialist.	Complement the PMU with the E&S specialists within 30 days after the Effective Date and thereafter maintain the PMU and these positions throughout Project implementation.	Funbio
B	CAPACITY BUILDING PLAN/MEASURES Prepare and implement the following capacity building measures: a. Prepare an E&S Risk Management Training Plan for periodic capacity-building of Project staff, addressing E&S requirements as set out in the Project's E&S documents to be prepared according to this ESCP requirements. b. Provide periodical training sessions for PMU staff on ESF standards relevant for the Project and specific issues, such as SEA/SH and code of conduct, reporting and addressing incidents and accidents, grievance redress mechanisms, and community health and safety.	The first training session must be conducted within 90 days after the Effective Date. Thereafter, conduct training sessions with contracted workers at the beginning of the period of the contract.	Funbio/PMU
MONITORING AND REPORTING			
C	Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include: • Status of preparation and implementation of E&S documents required under the ESCP. • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. • Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. • E&S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports. • Number and status of resolution of incidents and accidents reported under action E below.	Submit semestral reports to the Bank throughout Project implementation, commencing after the Effective Date. Submit each report to the Bank no later than 45 days after the end of each reporting period.	Funbio/PMU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
D	CONTRACTORS' MONTHLY REPORTS Require contractors and supervising firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Bank upon request.	Throughout Project implementation.	Funbio/PMU
E	INCIDENTS AND ACCIDENTS a. Notify the Bank of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Bank upon request. b. Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Bank, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.	a. Notify the Bank no later than 48 hours after learning of the incident or accident. Provide available details upon request. b. Provide review report and Corrective Action Plan to the Bank no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.	Funbio/PMU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS 1. Prepare and implement an Environmental and Social Impact Assessment (ESIA) for Part 1 and Part 2 of the Project, consistent with the relevant ESSs, and include the main elements of the ESIA as a chapter in the Project's Operations Manual (POM). 2. Prepare and implement an Environmental and Social Management Plan (ESMP) for each Territorial and Environmental Management Plan of Quilombola Land (PGTAQ) prepared under the Project, consistent with the relevant ESSs. 3. Require the Ministry of Racial Equality (MIR) to comply with the preventive and mitigatory measures identified by the ESIA, as set out in the POM. The proposed activities described in the exclusion list set out in the POM shall be ineligible to receive financing under the Project.	1. Prepare the ESIA and incorporate it into the POM no later than the Effective Date, and thereafter implement the ESIA throughout Project implementation. 2. Prepare and implement ESMPs alongside the preparation of PGTAQs, and thereafter implement the ESMPs throughout Project implementation. 3. Throughout Project implementation.	Funbio/PMU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	4. Ensure that the environmental and social screening, assessment, and stakeholder engagement procedures under the Project shall consider the specific characteristics, vulnerabilities, and barriers to participation faced by Quilombola communities, including vulnerable groups within communities, and incorporate culturally appropriate measures into Project implementation.	4. Throughout Project implementation.	
1.2	MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of the ESCP, including, <i>inter alia</i>, the PGTAQs' ESMPs, the Labor Management Procedures, and code of conduct, into the E&S specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Bank.	As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Bank upon request.	Funbio/PMU
1.3	TECHNICAL ASSISTANCE Ensure that consultancies, studies, capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Bank, and consistent with the ESSs. Thereafter, prepare and finalize the outputs of such activities in compliance with the terms of reference.	Throughout Project implementation.	Funbio/PMU
1.4	USE OF BRAZIL'S ENVIRONMENTAL AND SOCIAL FRAMEWORK 1. Ensure that the E&S risks and impacts of the Project, including in relation to labor and working conditions, are managed in accordance with this ESCP and the Brazil's E&S Framework, which includes, <i>inter alia</i>, the country's relevant policy, legal and institutional framework, including its national, departmental, or local implementing institutions and applicable laws, regulations, procedures, and implementation capacity. 2. Promptly notify the Bank of any changes to the Brazil's E&S Framework that may materially adversely affect the Brazil's ability to manage the E&S risks and impacts of the Project in line with the ESSs and the immediate measures taken or that are planned to be taken to address said changes and the ensuing potential risks and impacts of the Project. If, in the opinion of the Bank, such changes adversely affect relevant ESHS risk management aspects of the Project, Funbio shall agree to implement measures and actions to address them in a manner acceptable to the Bank. The ESCP shall be updated to reflect such agreed actions.	1. Throughout Project implementation. 2. Notify the Bank immediately after taking notice of the change to the Brazil's E&S Framework. Subsequent actions, if requested by the Bank, shall be reflected in an updated ESCP as indicated in paragraph 4 of the Initial Section of this ESCP.	Funbio/PMU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.5	ACTIVITIES SUBJECT TO RETROACTIVE FINANCING a) Conduct an E&S Assessment of activities that may be subject to retroactive financing under the project evidencing they have been conducted in a manner consistent with the applicable ESSs (i.e., as relevant, prior screening and assessment of E&S risks and impacts, implementation of mitigation measures required by the environmental license, compliance with the Brazilian labor law, consultation with affected communities, prior compensation of affected assets at replacement cost) and including a proposal of corrective action plans or measures as deemed necessary in accordance with the ESSs. b) Submit the Report on the E&S Assessment to Bank approval as a disbursement condition and thereafter implement any corrective action plans or measures in a timeline acceptable to the Bank.	As part of the submission of the request for retroactive financing.	Funbio/PMU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES a. Incorporate in the POM, adopt, implement, and cause MIR to adopt and implement, the following measures for the proper management of the working conditions of Project workers: (i) Implement the Project in accordance with the Brazilian labor regulations on 1) terms and conditions of employment, 2) protection of the work force (banning child and forced labor), 3) occupational health and safety, and 4) grievance mechanisms for raising concerns/grievances related with working places and conditions without reprisals; (ii) Adopt all measures needed to require that primary suppliers take measures to promptly remedy any identified cases of child labor or forced labor in line with ESS 2 requirements; (iii) Adopt and cause all contractors and subcontractors to adopt and implement the SEA/SH Prevention Plan (that will be described in the Project Operation Manual and reproduced in all bidding documents), setting standards of behavior and establishing responsibilities and procedures for responding to SEA/SH substantiated allegations; (iv) Ensure that 1) OHS – Occupational Health and Safety Procedures are fully applied to community workers, particularly those in remote areas, and 2) register evidence that their works are provided on a voluntary basis, do not involve children under the legal age and do not constitute forced labor; and b. Incorporate all these requirements in all bidding documents for hiring contractors.	a. Same timeframe as action 1.1 above. b. Throughout Project implementation.	Funbio/PMU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism where Project workers can raise concerns about working conditions and terms (including SEA/SH and Gender-Based Violence issues) consistent with ESS 2.	Establish the grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	Funbio/PMU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Incorporate elements of a Waste Management Plan (WMP) as part of the ESIA and ESMPs prepared for the Project, to manage hazardous and non-hazardous wastes, consistent with ESS3.	Same timeframe as action 1.1 above.	Funbio/PMU
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the ESIA and ESMPs to be prepared under action 1.1 above, particularly addressing energy, water and pesticide use, among other relevant aspects under ESS3.	Same timeframe as action 1.1 above.	Funbio/PMU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	COMMUNITY HEALTH AND SAFETY a) Assess and manage specific risks and impacts to the community arising from Project activities in terms of potential exposure to communicable diseases, misconduct of Project workers and SEA/SH risks and incorporate procedures to address these risks in the Project Operation Manual. b) Incorporate requirements to ensure Project Workers are aware of i) expected proper behavior standards, ii) Project's zero tolerance with SEA/SH; and iii) sanctions in case of misconduct in the contractors' procurement documents and contracts.	a) Same timeframe as action 1.1 above. b) Throughout Project implementation.	Funbio/PMU
4.2	SEA AND SH RISKS Prepare and implement a SEA/SH Action Procedure as part of the POM to identify and implement SEA/SH measures, including mapping of services for victims of SEA/SH in the Project intervention areas, codes of conduct for Project workers, and procedures to receive, register, and facilitate the resolution of SEA/SH complaints, including through the grievance mechanism and the referral to service providers, all in a safe and confidential manner.	Same timeframe as action 1.1 above.	Funbio/PMU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
5.1	Although ESS5 is not currently considered relevant to the Project, the POM shall include procedures to screen Project activities for potential restrictions on land use or access to natural resources affecting quilombola communities, including potential disproportionate impacts on vulnerable or minority groups, and define corresponding management measures for any identified risks.	Same timeframe as action 1.1 above.	Funbio/PMU
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS a. Incorporate as much as possible in the rules, regulations and requirements of the Quilombola Fund to be structured under Part 1 of the Project, environmental sustainability criteria for the use of biodiversity and for production or other activities to be supported with the Fund's resources, to prevent negative impacts on biodiversity, natural habitats and critical habitats. b. Include in the ESIA and ESMPs to be prepared under action 1.1 above, measures consistent with ESS6 to ensure (i) the sustainable use and monitoring of any biodiversity element targeted for economic or livelihood use under the PGTAQs to be supported under the Project, (ii) that endangered species and natural or critical habitats will not be negatively impacted, and (iii) that if critical habitats are present, no net loss of biodiversity will occur as a result of Project activities.	a. During the preparation and consultation of the rules, regulations and requirements of the Quilombola Fund. b. Same timeframe as action 1.1 above, and thereafter implement the ESIA and ESMPs throughout Project implementation.	Funbio/PMU
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	Not relevant for the Project.		
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS Incorporate in the POM to be prepared under action 1.1 above, measures consistent with ESS 8 to respect and preserve cultural heritage, traditional knowledge and practices.	Same timeframe as action 1.1 above.	Funbio/PMU
8.2	CHANCE FINDS Describe and implement the chance finds procedures as part of the POM to be prepared under action 1.1 above. Measures should be consistent with ESS 8 and the Borrower's E&S Framework to protect and report chance finds that might occur as a result of the implementation of Project activities.	Same timeframe as action 1.1 above.	Funbio/PMU
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	Not relevant for the Project.		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.1	STAKEHOLDER ENGAGEMENT PLAN Finalize, adopt, and implement a Stakeholder Engagement Plan (SEP) for the Project, in a manner consistent with ESS10, which shall include measures to, <i>inter alia</i> , provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.	Finalize, disclose, and adopt the SEP no later than 30 days after the Effective Date, and thereafter implement the SEP throughout Project implementation.	Funbio/PMU
10.2	PROJECT GRIEVANCE MECHANISM a. Establish, maintain, and operate an accessible grievance mechanism to receive and facilitate resolution of concerns and grievances in relation to the Project (as well as SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner), in a manner consistent with ESS10. b. Publicize Funbio and MIR's Ombudsman Office contact information through all communication materials about the Project. c. Report to the Bank on the handling of concerns and grievances raised in relation to the Project, including a specific section on the handling of concerns and complaints raised by Quilombola Peoples and other vulnerable social groups.	a. Establish the grievance mechanism no later than 30 days after the Effective Date, and thereafter maintain and operate the mechanism throughout Project implementation. b. Throughout project implementation. c. Throughout project implementation.	Funbio/PMU
INDICATORS FOR IMPLEMENTATION READINESS			
The following actions are indicators for implementation readiness: Section A (a and b) 1.1 2.1 3.1 3.2 4.1 4.2 5.1 6.1 (a and b) 8.1 8.2 10.1 10.2 a d			