

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

**Municipality of São Paulo
Municipal Department of Development and Social
Assistance (SMADS)**

**Project Preparation Support to SMADS with *SP
QualificaSUAS* (P504899)**

**Grant under the Grant Facility for Project
Preparation**

[Approval Version]

[June 25, 2025]

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Municipality of São Paulo (the Recipient) is planning to implement the proposed Strengthening Social Assistance Delivery System in the Municipality of São Paulo Project (the Project), with the involvement of the Municipal Department of Development and Social Assistance ("Secretaria Municipal de Desenvolvimento e Assistência Social - SMADS) for which it has requested a grant under the Grant Facility for Project Preparation (GFPP), as set out in the Letter Agreement (the Agreement). The International Bank for Reconstruction and Development (hereinafter the Bank) has agreed to provide the GFPP grant to finance activities (the Activities) related to the preparation of the Project, as set out in the referred Agreement.
2. The Recipient shall ensure that the Activities are 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 referred 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 for the Activities, 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, during the implementation of the Activities, to reflect adaptive management of changes and unforeseen circumstances related to the Activities or in response to assessment of performance of the Activities. 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. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS			
A.	ORGANIZATIONAL STRUCTURE Designate one E&S focal point to be responsible for the management of environmental, social, health and safety (E&S) risks and impacts of the Activities, and ensure the proper and diligent implementation of the ESCP.	Appoint the E&S focal point no later than 30 days after the Effective Date and thereafter maintain this position throughout implementation of the activities.	SMADS
MONITORING AND REPORTING			
A	REGULAR REPORTING Prepare and submit to the Bank monitoring reports on the environmental and social (E&S) performance of the Activities (as part of the Progress Report), including but not limited to the implementation of the ESCP, status of E&S instruments under preparation, stakeholder engagement activities, log and status of any complaints received and any other relevant aspects as concerned to the E&S risk of the Activities.	Submit six-monthly reports to the Bank during implementation of the Activities, commencing after the Effective Date. Submit each report to the Bank no later than 45 days after the end of each reporting period.	SMADS
B	INCIDENTS AND ACCIDENTS Notify the Bank of any incident or accident relating to the Activities 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. 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.	Notify the Bank no later than 48 hours after learning of the incident or accident. Provide available details upon request. 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.	SMADS

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.2	TECHNICAL ASSISTANCE <p>Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, and training under the Activities, including support to the preparation of E&S Plans, are carried out in accordance with the terms of reference as agreed with the Bank, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout implementation of the Activities.	SMADS
ESS 2: LABOR AND WORKING CONDITIONS			
2	LABOR MANAGEMENT PROCEDURES <p>Ensure that workers are engaged in the implementation of the Activities consistent with ESS2. To this end, ensure that the following measures are carried out:</p> <ul style="list-style-type: none"> • Comply and cause third parties that engage workers in the implementation of the Activities (contractors, subcontractors, consulting companies, etc.) to comply with the requirements of the Brazilian Labor Law, including i) the provision of information and documentation on terms and conditions of employment, ii) the principles of fair treatment, non-discrimination, freedom of association, and zero tolerance with forced labor and child labor, and iii) the compliance with occupational health and safety standards. • Incorporate the relevant requirements above in the E&S specifications of the procurement documents and contracts with third parties that engage workers in the implementation of the Activities. 	Carry out the measures throughout the implementation of the Activities.	SMADS

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> Ensure that workers engaged in the implementation of the Activities have access to information on i) the rule of zero tolerance to SEA/SH and ii) the channels to raise SEA/SH concerns and the network of referral and survivor-oriented services against SEA/SH that are available at the municipal, state and federal levels. Ensure that workers engaged in the implementation of the Activities have access to grievance and redress mechanisms to raise concerns related to working and workplace conditions without fear of retaliation. 		
ESS 3 to ESS9			
3	Relevant aspects of these standards shall be considered in the technical assistance activities under action 1 above, as relevant.	Same timeframe as for action 1.	SMADS

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE		
<p>10.1 STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</p> <p>Incorporate stakeholder engagement and information disclosure measures in the implementation of the Activities, in a manner consistent with ESS10, including actions focused on vulnerable groups, especially young people, homeless people, women, the elderly, LGBT people, black people, etc.</p> <p>To this end, ensure that the following measures are implemented:</p> <ul style="list-style-type: none"> a) Provide stakeholders with information about the environmental and social risks and impacts of the Activities in a timely, understandable, accessible and appropriate manner and format, including but not limited to any environmental and social instruments prepared as part of the Activities [consider specifying where such information shall be available e.g. Activities sites, government offices, websites, etc.]; b) Consult stakeholders in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation, including with regards to any environmental and social instruments prepared as part of the Activities; c) Document the stakeholder engagement activities, including: (i) stakeholder mapping; (ii) description of consultations and participation mechanisms utilized, and records of meetings held; (ii) feedback received and responses to said feedback; and (iv) measures to engage stakeholders who, because of their particular circumstances, may be disadvantaged or vulnerable; 	<p>Implement the stakeholder engagement activities throughout the implementation of the Activities.</p>	<p>SMADS</p>
<p>10.2 GRIEVANCE MANAGEMENT</p>	<p>Throughout implementation of the Activities.</p>	<p>SMADS</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Receive and facilitate resolution of concerns and grievances in relation to the Activities, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all parties affected by the Activities, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10, including actions focused on vulnerable groups, especially young people, homeless people, women, the elderly, LGBT people, black people, etc.		