

## ESRS Santa Vitoria do Palmar Wind Farms Complex - Rio Grande do Sul

### 1. General information about the scope of the environmental and social review by the IIC

The Santa Vitoria do Palmar Wind Farms Complex – Phase I (“the Project”) is situated in the southern part of the state of Rio Grande do Sul, in the municipality of Santa Vitoria do Palmar. The project is composed of 69 Acciona Model AW3000 aerogenerators, each having 3 MW of power, to be distributed among 12 Wind Power Plants (CGEs), totaling 207 MW of installed power. The 12 CGEs of the CEAM [Aura Mangueira Wind Farms Complex] – Phase 1 are covered by different Contracts for Electric Power Marketing in Regulated Environment – (CCEAR) because they were the successful bidders in electric power auctions A-3 2014 and A-5 2013.

The Project was licensed with the State Environmental Protection Foundation – FEPAM (*Fundação Estadual de Proteção Ambiental*), the agency responsible for environmental licensing in the State of Rio Grande do Sul. To obtain issuance of Advance Licenses, three Environmental Studies were submitted to that agency, prepared as Simplified Environmental Reports (RAS), one for each phase of the Project.

### 2. Environmental and Social Classification, Justification

The Project is classified as a Category A project. According to the IIC Environmental and Social Sustainability Policy, these are projects that can result in environmental or social risks and impacts that are potentially significant and diverse, irreversible or unprecedented, and that frequently extend beyond the boundaries of the locality or the actual project installations.

This classification results from the occurrence at the project site of two important bird migration routes – the Atlantic Route, an important national route, and the Rio Grande do Sul Central Depression Route, a regional route. This means that migratory bird species could be irreversibly affected by the enterprise, not only in the project area, but beyond its local limits.

### 3. Environmental and Social Context of the Project

A humid sub temperate climate predominates in the region. The morphology of the project area and vicinity is characterized by a plain, with modeling that originated with marine and lacustrine sediments. It appears as a practically flat surface, with altitudes varying from 3 to 15 meters. In the entire area there is not a

single point of topographic distinction. The principal hydric formations are irrigation canals, marshes, arroyos, and areas subject to flooding.

The pattern of vegetation in the region of the venture is quite fragmented. Settlements have been recorded for many years. It is part of the Pampa biome and the vegetation is officially classified as “Pioneer Formations,” also known as “Coastal Fields.” According to studies, anthropized fields predominate in the region, being used for agricultural purposes. The principal crops are rice and soy and the fields may be left to lie fallow after a harvest, which is when native species regenerate. There are few Individual trees, arranged in stands or on small fragments dispersed over the landscape.

The State of Rio Grande do Sul reports that there are 101 species of amphibians, and a similar recorded number of reptiles, 111 species. In the case of birds, 171 species of birds are listed that may be distributed in the study area. In the case of mammals, the presence of different micro-environments affords countless niches for mammals to live in this ecosystem, which results in an expected list of 102 species, considering the Pampa biome.

There are no legally protected areas (such as conservation units) or internationally recognized areas (such as Key Biodiversity Areas – KBA, Important Bird Areas – IBA, Important Plant Areas – IPA, Alliance for Zero Extinction sites - AZE and wetlands designated as important under the Ramsar Convention) within a 10 km radius of the wind Farms complex and transmission line. The closest conservation unit is the Taim Ecology Station, approximately 26 km from the Indirect Influence Area (IIA) and 33 km from the Direct Influence Area (DIA) of the wind farms. There was no intervention into areas of permanent preservation – APP, during installation of the project.

The southern part of the State of Rio Grande do Sul is considered favorable as a renewable energy hub involving biomass and wind energy. Its rice crops are extremely productive, the quality of the grains produced is high, and the end products are well diversified. It is a center of fruit and wine production, as well as oilseeds that can be used for biodiesel. Its cattle, horses and sheep are genetically advanced and very productive.

The 2016 population of Santa Vitoria do Palmar has been estimated by the Brazilian Institute of Geography and Statistics (IBGE) at 31,352. Important economic activities in the municipality of Santa Vitoria do Palmar

include beef cattle, sheep for wool production, and rice-growing as key to municipal development and revenue. Almost 88% of the municipality is classified as urban (IBGE, 2006). The Human Development Index (HDI) for the municipality was 0.712 in 2010, which places it in the “high” (Developing) range (an HDI between 0.700 and 0.799). The percentage of households with access to public water supply was 77.5%. A reported 26.5% of households have sanitary sewer service from the municipality, and 83.4% were served by trash collection

The population affected by the project is concentrated in the Vila do Espinilho district, formed by the rice growers who live there. This district has a good infrastructure and can be considered as one of the most developed in the municipality. Another affected population group is composed of the owners of the land on which the aerogenerators were/are being installed.

#### **4. Environmental and Social Risks and Impacts, Mitigation and Compensation**

##### **4.1 Assessment and Management of Environmental and Social Risks and Impacts**

###### **4.1.a The Environmental and Social Assessment and Management System**

In April 2016, Atlantic’s Corporate Coordinator of Environment finalized the Sustainability Management System Manual (Revision No. 4 of November 17, 2016), observing IFC Performance Standards. The manual is now being implemented. It establishes policies and procedures for managing the environment, health and safety, and stakeholder engagement. It also determines the guidelines of the Atlantic Sustainability Policy. The manual is implemented by the Sustainability Management Committee comprised of the CEO, Coordinator of the Environment, Coordinator of Occupational Health and Safety, and Coordinator of Human Resources. Although the manual is not very detailed, it is compatible with the requirements of IFC Performance Standards.

Companies subcontracted for construction, operation, and maintenance are subject to the Contractual Guidelines on Environment, Health and Safety that are attached to the contracts and subsequently supervised by the Company. It should be noted, however, that there are no Social Contractual Guidelines.

The Guideline on Environment includes the following key requirements: Requirements for Use of Natural Resources; Solid Waste Management; Liquid Effluents Management; Management of Interventions in Flora

and Fauna; Environmental Controls for Civil and Electromechanical Works; Requirements for Training and Recording of Environmental Incidents. It does not cover procedures for managing certain environmental risks normally present in this situation. It exhibits the following gaps when compared with the IFC's Environmental, Health, and Safety General Guidelines:

- Specific criteria for hazardous product management, including criteria for installation of the fuel plant, repair shop, hazardous product storage, etc.;
- Criteria for efficient use of resources, particularly water and electricity;
- Footprint Management;
- Requirements for monitoring of liquid effluents, noise, and particulate matter;
- Requirements for decommissioning of installations and worksites, and recovery of degraded areas;
- Requirements for assessment of environmental risks and impacts
- Requirements for treatment of non-conformities, and corrective and preventive actions;
- Key Performance Indicators (KPI);
- Requirements for issuance of periodical reports.

The Contractual Guideline on Health and Safety is very detailed, and compatible with the requirements of IFC Performance Standard No. 1. The following were established as minimum requirements: (i) Atlantic requires submission of the legal documentation pertaining to Occupational Health and Safety (SST) in order to grant an employee access to the project site; (ii) all new workers receive mandatory orientation, during which requirements for safety and environment as provided in the contract are presented; (iii) prior to beginning work, Atlantic requires their contractors to draft a Preliminary Analysis of Hazards and Risks (APPR), in which risks to health and safety are assessed and the preventive and control measures to be implemented during the execution of each activity provided for in the contract are identified.

#### 4.1.b Policy

The Atlantic Sustainability Policy is sufficiently comprehensive and compatible with the requirements of the IFC Performance Standards applicable to the project.

#### 4.1.c Identification of Risks and Impacts

The Simplified Environmental Report (RAS) considered as environmental factors components of the adopted model of impact identification, the systems referred to as natural environment and anthropic environment, and the corresponding subsystems: physical environment, biotic environment, perceptual environment, and the social/economic/cultural environment.

Impacts on the physical environment include the following: (i) changes in air quality; (ii) localized changes in winds and solar irradiance; (iii) modifications in the carbon cycle; (iv) changes to the surface of the terrain (local relief); (v) changes in the edaphology and structure of the soil; (vi) changes in soil use and occupation; and (vii) changes in the water balance.

The impact related to inconveniences and risks to safety provoked by electromagnetic fields was not addressed in the RAS. Therefore, these effects should be assessed and monitored as established in the World Bank Group Environmental, Health and Safety Guidelines for Wind Energy and for Electric Power Transmission and Distribution.

Other impacts of the construction phase, such as changes in the quality of ground water and soil quality were not addressed in the RAS. Given the current status of the project, such evaluation no longer appears to be material. However, a plan for decommissioning the works appears to be necessary and a preliminary investigation of polluted areas should be made, to include remediation measures if pertinent.

The impact in terms of waste generation was not addressed in the RAS, however the Basic Environmental Plan (PBA) introduces a plan for solid waste management that is considered sufficient for the project.

In order to install the wind energy parks and transmission line, vegetative ground cover was removed to make space for the aerogenerators, the job site, and for opening and improvement of access roads and easements. However, the anthropized fields, which are used for farming and may lie fallow were the primary physiognomy affected. Because the current landscape is anthropized, there was very little removal of individual trees.

With respect to fauna, sufficient risks and impacts were identified that a document similar to the RAS was drafted. The impacts caused by collisions with aerogenerators focused only on threatened species, but this

impact extends to any species of winged fauna that flies at an altitude where collision might occur. Similarly, no migratory routes were observed.

In relation to the impacts on the perceptual environment, the impact mentioned was a change in the subjective quality of the space during installation and operation of the project. Installation of the aerogenerators would affect the image now present in the minds of the population, as well as contrasting with the structures already built at the site.

The impacts suggested as possibly occurring on the social, economic, cultural environment were: (i) change in the expectations of the population; (ii) changes in quality of life; (iii) increase in the size of the population as a whole; (iv) exposure of workers and the population in the vicinity to potential health problems; (v) shortage of housing and hospitality facilities; (vi) change in population density associated with the creation of jobs; and (vii) change in the amount of municipal revenue collected, because of the improvement of the local economy.

Specific risks related to worker health and safety were not included in the scope of the RAS, although they have been the subject of assessment by subcontractors responsible for carrying out the activities in accordance with contractual requirements established in Atlantic's Health and Safety Guideline. The process of identification and assessment of hazards and risks required by the Contractual Health and Safety Guideline usually follows the rules established in International Standards OHSAS 18001 and ISO 31000. It should be noted, however, that during the supervision exercised by Atlantic no documented evidence was obtained to confirm that the subcontractors have implemented suitable procedures for evaluation and prevention of these risks, either for the construction phase (already in final stages) or--and especially—for the operations phase (now getting started).

#### 4.1.d Management Programs

In the interest of proper mitigation of diagnosed impacts, and following the licensing procedure, 14 Monitoring Programs were developed: (i) Recovery of Degraded Areas and Control of Erosion; (ii) Solid Waste Management; (iii) Management of Flora; (iv) Environmental Education for workers; (v) Monitoring of Fauna; (vi) Management and Rescue of Fauna; (vii) Prevention and reporting of Vehicle Collisions with Fauna; (viii) Monitoring of Ground Water; (ix) Archeological Follow-up; (x) Paleontological Follow-up; (xi)

Signage for Access Roads; (xii) Communications and Media; (xiii) Monitoring of Water Quality; and (xiv) Monitoring of Noise Pollution.

The Program for Recovery of Degraded Areas and Control of Erosion (PRAD/PCE) did not call for the use of native species of large trees and shrubs in promoting recovery of degraded areas and erosion control. The Program focused only on regeneration of existing field vegetation and, when necessary, planting of grasses to help accelerate the regeneration process.

Trees felled are to be compensated by means of mandatory reforestation. The reforestation plan approved for wind energy parks proposes the planting of 188 seedlings of native species along the boundaries of a fragment of land in the vicinity of the wind energy complex.

The Construction Environmental Plan (PAC) for the transmission line includes three projects aimed at mitigating the impacts of the suppression of vegetation: (i) Native Plant Species Management Project; (ii) Exotic Plant Species Management Project; and (iii) Project for Relocation and Rescue of Epiphytes and Threatened Species of Flora. These projects were to be carried out during the construction phase. Vegetation suppression or species relocation and rescue of certain species may become necessary. During the inspection conducted in March, it was reported that the objectives and timetables of the PBA had been fulfilled. However, no status reports for Transmission Line environmental projects were presented.

With respect to the Fauna Monitoring Program, the methodologies used were considered accurate for the majority of the fauna groups, with a few reservations. In the case of amphibians, the number of sampling points (12) can be considered as adequate. However, the minimum listening time was five minutes, which can be considered too short. Also, random dislocations of the sampling points occurred. For purposes of comparison between campaigns it would be best if these dislocations had been standardized, as was done for birds.

In the case of birds, it is recommended, based on the information obtained, that the specific locations where species have been recorded that are most likely to collide with aerogenerators be mapped in order to evaluate the potential impacts on this group during the operations phase. In the case of bats, five transects were traveled by an individual walking with an ultrasound detector. However, no information on the size of the transects and time of day at which they were monitored was presented. Furthermore, while

it is understood that there is a difficulty in identification at the specific level, a possible identification, even at the family level, would permit a better assessment of the risk of collisions.

A Communications and Media Program and an Environmental Education Program were proposed as measures to mitigate the impacts on the Social-Economic-Cultural Environment. The Communications and Media Program features two lines of action: outreach using announcements on local radio stations and dissemination using visual materials. A contract was signed with local Radio America FM 90.3, which will broadcast six 30-second announcements every day, Monday through Saturday. Communications using visual materials is associated with the environmental education of workers and the local community. It will arrange for installation of educational signs in May 2016 in the Wind Farms Complex area of influence.

#### 4.1.e Organizational Skills and Competencies

Construction and maintenance of aerogenerators has been assigned to qualified companies. Only the management of the construction and operation is performed by Atlantic's own personnel. The corporate personnel structure includes, primarily, the executive officers, legal department, human resources staff, and the coordinators of occupational safety and environment who report directly to the Executive Board for Construction and Operation. The project management team has been assigned to work directly on the site during the operational phase. Project management tools are in line with the requirements of the Project Management Body of Knowledge (PMBOK).

Supervision of health and safety during the construction phase at the Santa Vitoria do Palmar Wind Farms Complex (CE SVP) is being conducted by 2 (two) Occupational Safety Technicians and 1 (one) Atlantic Works Assistant. They report directly to the Corporate Coordinator of Health and Safety. Supervision of the companies contracted to execute the Environmental Programs is handled by Atlantic's Corporate Coordinating Office of Environment, which includes 1 (one) Corporate Coordinator and 1 (one) Environmental Analyst. That office is to receive reports of the results of deployment of these programs every two months (Reports on deployment of RDPA Programs prepared by the firm of NAPEIA Consultoria).

Because of the high degree of third party outsourcing involved in Atlantic operations, the Environmental, Social and Corporate Governance System (ESG) calls for a robust process of supervision and control over

subcontractor performance of environmental and social obligations. This is accomplished by assigning qualified supervisory teams and adopting appropriate verification and control procedures.

#### 4.1.f Emergency Preparedness and Response

The Contract Guideline on Health and Safety for construction and operation includes requirements imposed on Atlantic contractors to submit specific Emergency Preparedness and Response Plans related to their activities. It should be noted, however, that at the SVP Wind Farms Complex the planned simulated exercises were not held, which suggests deficiencies in the monitoring by Atlantic of the implementation of the Emergency Action Plans that were entrusted to third parties. However, as regards the structure of medical care during an emergency, the project has an appropriate Medical Emergency and First Aid Plan (PEMPS). At present, there are three ambulances that cover all the fronts on which construction is proceeding at any moment.

During the Due Diligence Mission, it was reported that agricultural chemicals are frequently being applied by crop-dusting aircraft within the CE SVP. The associated risks and potential accidents involving this activity were not properly identified so are not being formally controlled under the existing plans (PGR/PAE).

#### 4.1.g Monitoring and Analysis

At the Santa Vitoria do Palmar Wind Farms Complex (CE SVP), health and safety supervision during the construction phase is being performed by two occupational safety technical staffers from Atlantic. Environmental supervision is usually delegated to subcontractors that specialize in deploying the environmental programs required during the environmental licensing process. In the specific case of the CE SVP, NAPEIA Consultoria is responsible for environmental supervision.

Supervision of the companies contracted to execute the Environmental Programs is usually performed by Atlantic's Corporate Coordinating Office of Environment, which receives reports on the results of the deployment of these programs every two months.

Environmental and SST non-conformities are discussed weekly at project management meetings. Corrective and preventive action plans are recorded in the meeting minutes and forwarded to subcontractors so that they will be informed of them.

The company has produced an Occupational Health and Safety Manual (SST Manual) and an Operation and Maintenance Manual (O&M Manual) for the operations phase. These are contractual requirements and the contracted companies must comply with them. O&M activities will be conducted through semiannual audits performed by the Corporate Coordinators of Health and Safety and the Environment.

Only the Contractual Guideline on Health and Safety includes appropriate performance indicators. It will be necessary to establish, and include in the Contractual Guideline on the Environment, the key performance indicators (KPI) that are to be routinely monitored by Atlantic during the deployment and operations phases.

Although the construction work now in progress includes, basically, completion of the Medium Voltage Network (RMT) at 12 kV, electromechanical assembly work, commissioning and maintenance of access roads, as well as the demobilization of construction sites. At the transmission line tower factory, activities typical of construction continue. These include production of ring segments [keystones] in precast concrete, warehousing, framing, cargo hoisting, concrete production, etc. During the inspection at the site some non-conformities were observed related to cargo hoisting, segregation of wastes, and electrical installations.

Atlantic has not been supervising the activities at the tower factory because it believes that is a licensed facility that is operated by Acciona, the Spanish company contracted to supply and assemble the aerogenerators. However, because this is an industrial installation dedicated to the project, that currently involves a significant number of workers, and is responsible for a significant portion of the impacts and risks associated with the construction phase, it will be necessary for Atlantic to start supervising it as it has been doing with the other subcontractors.

The following situations were observed during a field inspection: (i) the number of documented SST and environmental inspections was very limited. They were supported by tools (checklists) that will need to be refined and made compatible with the applicable IFC requirements (General EHS Guidelines,

Environmental, Health, and Safety Guidelines for Wind Energy); and (ii) corrective and preventive actions were not being adequately monitored and their proper implementation was not documented in auditable records. There was no evidence of the existence of documented and auditable procedure for control of non-conformities and corrective actions that would apply to both the construction and operation phases.

#### 4.1.h Stakeholder Engagement

The Sustainability Management System Manual prepared by Atlantic, includes a description of the Stakeholder Engagement Policy. It defines the scope and objectives of that policy, the means of identifying the interested parties, principles and methods of engagement, mechanisms for feedback and complaints, process management, and accountability. According to this policy, Atlantic identifies its stakeholders and monitors its relations with them. They are defined as individuals, groups of persons, or organizations that impact or may be impacted by the operations, products, or company services, as well as related activities. These include company personnel, shareholders, customers, regulatory bodies, communities, and suppliers.

There was no evidence at the Santa Vitoria do Palmar project of information that would be used as part of a Stakeholder Engagement Plan. It was found that stakeholder mapping had been done, but it was not possible to see how it could be ensured that all of them are being consulted or that the mapping is being routinely updated.

With regard to the commitment to disseminate significant information about the project to affected communities and stakeholders, the company has met the needs stemming from the enterprise, inasmuch as there has been contact with the affected population through direct communication as well as via a survey of perception, as described in the Simplified Environmental Report.

Under existing legislation, in the case of Atlantic there was no need for public hearings to be held as a requirement for obtaining an environmental license. As a result, Atlantic did not take the initiative to hold public relations events on its own, but did establish contacts with stakeholders in general. These contacts, however, were not recorded nor is there any documentation attesting to actual engagement with interested parties. There is no evidence of follow-up on any concerns that may have been raised, or indication that they have been resolved and/or taken into account in the Project.

The company is carrying out some social responsibility actions, among them a proposal for execution of programs financed by the BNDES (Brazilian Development Bank). In order to prepare such projects, a socio-economic diagnosis that included proposed social programs was performed in December 2016 by the firm of Biometria Consultoria e Projetos. The drafts of the projects were presented to the Bank but have not yet been approved.

It is believed that this kind of relationship with affected communities must be continuous and should accompany the project for quite some time. The company's social responsibility team is in contact with the Vila do Espinilho school for the purpose of sharing benefits and development opportunities in view of the fact that the BNDES automatically finances sustainability projects for the communities where this kind of project is being installed.

#### 4.1.i External Communications and Complaint Mechanisms

As regards external communications, evidence was not provided of the implementation and maintenance of procedures that would include: (i) receipt and recording of claims, complaints, and suggestions from the general public; (ii) examination and evaluation of questions raised by the affected population and/or stakeholders, and the manner in which these are forwarded and dealt with; and (iii) provision, monitoring, and documentation of responses. However, the company has an Internet website and an 800 number, is carrying out a Communications Plan as requested during the licensing of project installation and operations, and also has a communications channel entitled "At the sound of the wind."

A deficiency was detected in the execution of communications with society inasmuch as no mechanism or instrument of communication has been implemented that would enable stakeholders to express their concerns or lodge complaints. No documents were exhibited concerning consultations, claims, or complaints from the community that would have been recorded, studied, and answered. Project communications have been accomplished by insertions of messages on the radio and posters referring to significant topics. Nor was there evidence of the existence of a well-structured mechanism for analysis and response to questions and complaints from the community and other interested parties, as required under IFC Performance Standard No. 1. (PD 01) for all phases of the Project.

#### 4.1.j Continuous Reporting to the Affected Communities

The report by Communications and Media described the actions by Atlantic in the field of communications. As mentioned earlier, due to the absence of an office assigned to handle consultations and complaints and because no such mechanism has even been set up, it is impossible to assess whether the questions and complaints received were properly handled.

### 4.2 Labor and Working Conditions

#### 4.2.a Working Conditions and Employee Relations Management

##### 4.2.a.i Human Resources Policies and Procedures

The Brazilian contracting regime “Consolidated Labor Laws” (CLT) is compatible with IFC Performance Standard No. 02. However, a Human Resources Policy (or equivalent instrument) is needed in order to formalize the commitment to adhere to the Fundamental Principles and Rights at Work adopted by the International Labour Organization (ILO), and to establish procedures that guarantee its observance.

Atlantic has a Human Resources Policy and Procedures for recruitment, selection and hiring, vacations, provisions for obtaining scholarships for undergraduate and graduate level study, as well as MBA and Master’s degrees, procedures for training, language-learning, and employee transfers, among others.

The company does not, however, have rules and procedures in place that would define which elements of the policies that it adopted apply to their suppliers and service providers (subcontractors), or how the auditing and supervision of their working conditions is handled.

Company workers have a union, representative of the occupational class that freely negotiates with the company on the matter of worker benefits and rights. A collective bargaining agreement was signed between the Curitiba Union of Generation, Transmission and Distribution of Electric Power Concessionaires and Atlantic Energias Renováveis S.A. That agreement covers the occupational category of electrical power workers (*eletricitários*) which is defined as “employees of companies holding concessions for the services of generation, transmission, distribution and/or sale of electric power from hydric, thermal, or alternative

sources within the territory of Curitiba, state of Paraná.” The agreement prescribes the length of the workday and basic monthly hours; it lists the holidays, with provisions for days off, overtime, and night work bonuses. It does not address wages and salaries. Other benefits have been granted that do not appear in the agreement--such as meal vouchers, transportation vouchers, life insurance, health insurance plan, and dental care.

Employee compensation is defined in the procedure known as Fixed Compensation Policy and Procedure, which sets criteria for management of salaries (fixed remuneration) in order to ensure that management is based on merit, current legislation, and the strategic model selected by the company.

Atlantic considers transparency in relations with its personnel and appreciation of its workers to be of fundamental importance. It encourages their continued development by adopting procedures that make it possible to obtain scholarships for undergraduate and graduate level study, as well as MBA and Master’s degrees, and foreign language-learning. Managers are to use meritocracy as criterion in advancing the professional development of company personnel. Atlantic does not permit discrimination and promotes equality of opportunity. Furthermore, Atlantic does not accept any form of discrimination based on race, age, sex, color, nationality, religion, sexual orientation, physical or mental disability, or other forms of discrimination.

Atlantic made an Ethics and Conduct Channel available to its workers, to ensure confidentiality and security of information in cases of accusations or suggestions. The channel permits access and report of suggestions or any kind, or accusations of deviation from behavior as prescribed in the Code of Ethics and Conduct. The portal is administered by the firm of Contato Seguro. In addition, the company recently created the new Reporting Channel, which can be accessed 24 hours a day, seven days a week, by the following means:

- Telephone: 0800-6018659
- Internet: [www.contatoseguro.com.br](http://www.contatoseguro.com.br) or the shortcut at Atlantic’s website: [www.atlanticenergias.com.br](http://www.atlanticenergias.com.br). Clicking the “Complaints” tab will take the user to the Contato Seguro website.
- Downloading the Contato Seguro app on a tablet or smartphone.

#### 4.2.b Worker Protection

The Atlantic Code of Ethics and Conduct states that the following are unacceptable, either within or outside the company: (i) use of illegal labor and all forms of child labor or any other form of exploitation that is offensive to human dignity; and (ii) use of illegal labor and all forms of forced labor or any other form of exploitation that is offensive to human dignity.

#### 4.2.c Occupational Health and Safety

Atlantic does not presently have an Occupational Health and Safety Management System in the form required by IFC Performance Standard No. 1, although the Contractual Guidelines on Health and Safety in construction and operations address most of the IFC requirements applicable to the Project.

#### 4.2.d Outsourcing

There was no evidence of procedures having been pre-established by Atlantic for monitoring companies to whom work has been contracted out, although some of those companies are well-known internationally, which affords assurance that they are respectable and legitimate companies. However, the company does monitor the services contracts with subcontractors and conduct periodic inspections of the housing furnished for subcontractor personnel in order to protect the health of those workers and ensure compliance with all sanitary and environmental standards, according to regulations issued by the Brazilian Health Surveillance Agency (ANVISA) and related legislation.

There was no evidence that mechanisms exist for consultation and complaints by employees of the service provider companies. There was no evidence that procedures are in place to ensure that those companies are adhering to the requirements of Performance Standard No. 02.

### 4.3 Resource Efficiency and Pollution Prevention

#### 4.3.a Resource Efficiency

Because the project area is anthropized, having been used for decades to grow rice, there was no need to suppress vegetation. Vegetation suppression was limited to pruning or cutting isolated trees of species that

can be suppressed, principally along the 138 kV Transmission Line easement, at the crossing points where a few stands of trees are intercepted by the easement.

Facilities that drain off rainwater from the construction site are connected to the Mangueira Mirim VIII Wind Power Plant (CGE). Since the topography is flat, there was no evidence of erosion or sedimentation or interventions not anticipated in the RAS and/or not authorized by Atlantic.

A total of 21 km of access roads present in the Project area have been rehabilitated. Another 43 km of new access roads (about 6 m useful width) were constructed. According to Atlantic, no existing field vegetation was removed during installation of new access routes to the project, construction sites and collector substations.

The upper level of topsoil was removed only along the sides of the new access roads, where rainwater runoff ditches were carved. That topsoil was immediately applied to areas where the base material for those roads is confined and contained (gorges). The platforms of the aerogenerators measure about 2,000 m<sup>2</sup> (69 x 29 m). The topsoil removed was temporarily stored for later use in restoration of those areas after completion of the civil works.

No surplus material was generated from the excavations made to build the foundations for the aerogenerators, open trenches for the RMT, and transmission line towers. All material was re-used for topographic adjustments and the topsoil, which had been stored, was employed as soil conditioner in an effort to foster natural regeneration. The topsoil removed from the substation areas was re-used in recovery of degraded areas and the fill material was obtained from authorized locations. There was no need for blasting to break up rocks in this project.

#### 4.3.a.i Pollution Prevention

The process of segregating, collecting, packaging, shipping, and final disposal of wastes for which the construction company is responsible has been properly implemented in accordance with the Solid Waste Management Program (PGRS) proposed in the RAS. External shipping and final disposal of wastes generated on the project are handled by properly authorized outside contractors. The wastes from the project are being sent to the Central de Tratamento de Resíduos Sólidos Industriais e Comerciais de Chapeco Ltda.

The principal hazardous materials handled at the Project are the diesel oil used for the equipment and the additives that are among the ingredients of the concrete. These are being stored in appropriate locations. It is important to emphasize that there are no records of the occurrence of environmental incidents related to spills of dangerous products, although there was no evidence that a specific record book to be used in documenting such incidents has been designated.

Sanitary effluents generated at the installations on the construction site are temporarily stored in a septic tank and later sent to an authorized effluent treatment station (ETE). Similarly the sanitary effluents from chemical toilets (78.8 m<sup>3</sup> generated between July and December 2015) situated at points of active construction work are sent to an authorized ETE (Tecnisan Sistemas Operacionais de Saneamento Ltda.)

#### 4.3.a.ii Decommissioning and Recovery of Degraded Areas

Civil works have been completed. The concrete plant is being demobilized as are the aboveground tanks where fuel was stored. The worksite should be completely demobilized within the next several months. Only the administrative facilities and the reception desk will be retained. With respect to deactivation of the construction fronts, job site, concrete center and other supporting structures there was no evidence of a specific protocol to be applied by the supervisory team that would be used to document the fact that demobilization did not result in any kind of environmental liability. NAPEIA Consultoria will be responsible for this task, the results of which should be reported to the environmental authority (FEPAM) as part of the consolidated reports on adoption of the Environmental Programs to be submitted in connection with the subsequent request for an Environmental License for Operation.

The Program for Recovery of Degraded Areas (PRAD) proposed in the RAS does not call for use of native species trees and shrubs in the recovery of degraded areas and control of erosion. It focuses only on the application of procedures that foster regeneration of existing field vegetation and in planting, whenever necessary, grasses of the *Poaceae* family.

The condition of topographic relief associated with the arboreal, shrub, and herbaceous vegetation present in the region of the project favors recourse to natural regeneration of native vegetation for recovery of degraded areas, by smoothing out the terrain and repopulating it with native grasses in order to accelerate regeneration of the vegetative ground cover.

## 4.4 Community Health, Safety, and Security

### 4.4.a Community Health and Safety

The risks to the community that would be created by the project, both during construction and operations, were identified and have been mitigated by programs proposed in the Basic Environmental Plan (PBA). The impact identified as Changes in the Quality of Life, referring to negative impacts resulting from an increase in population as well as exposure of workers and the population of the vicinity to potential health problems, was not mentioned, nor was evidence presented as to their occurrence during the installation of the project. Nor were measures of mitigation adopted.

The risks to the health and safety of the community involve primarily the transportation of materials and equipment, as well as electrical risks related to operation of the RMT, the 138 kV Transmission Line, and the associated substations, even though management of the risks of transportation to the project site is considered appropriate in the context of the transportation process (Road Survey).

The RAS did not identify an impact on the community related to communicable disease, except for the impact on Changes in the Quality of Life. These negative impacts were the increase in population and the exposure of workers and residents of the vicinity to potential health problems—notably potential accidents on the job, proliferation of STDs, hearing problems, including annoyance, caused by the increase in noise levels, allergies due to the presence of number of particles in the air, etc.

### 4.4.b Security Personnel

A system to control the entry and exit of persons is indicated on the project site plan. Vehicles would be recorded and identity and cargo checked by an employee of the firm of GD Mackmillan ME – ARM who is on duty from 8:00 a.m. to 6:00 p.m.

A security company, EPAVI Seguranca Ltda., has been contracted to guard the area of the parks. Its six employees work in three shifts, 24 hours a day. That surveillance system is passive, unarmed, and the employees are trained only to make rounds throughout the complex and check whether any people are moving around near the installed equipment.

#### 4.5 Land Acquisition and Involuntary Resettlement

In 2011, Atlantic leased properties situated in the area where the wind Farms complex would be installed. This was done by lease agreement under which the owner of the land ensures the other party, in return for a fixed sum or a payment readjustable at established intervals, the use and enjoyment of those properties.

The extent of the lands to be used on a permanent basis will be stipulated after the assignee has acquired the technical information alluding to the production of energy, a situation that will not occur until after of wind assessments have been made, as well as after any land ownership situations have been resolved and the topography of the property determined.

During the deployment of the project, if physical damages occur within the boundaries of the leased area that are shown to have been caused by the installation and construction of the wind park, such as damage to fences, gates, pasture and other properties, Atlantic would pay for repairing that damage, acting within 30 days of the date on which the owner gives notice of the damage to either make the repairs and/or make monetary payment for them, Atlantic being subject to court action if it does not comply. During the operations period, understood as beginning on the date of startup of commercial generation of electric power by the aerogenerators, Atlantic will pay the property owner an annual fee per hectare, based on the entirety of the area ceded.

The contract for assignment of the right to use the property shall run 37 (thirty-seven) years from its signature date and will be renewed automatically for successive 20-year periods, in the absence of a statement to the contrary by the parties given 06 (six) months in advance of the ending date. Remuneration during the pre-operational phase will begin on the signature date of the document assigning the right to use the property and remain in force for 72 months, renewable for an additional 36 months at the discretion of the assignee, expressed by notification to the assignor. The contracts were signed with three companies—two of them farmers whose activities include livestock, and one is a rice grower—as well as with 16 private property owners. There are a total of 210 documented lots on those properties.

This project did not involve resettlement or dislocation of people. It can be stated that the acquisition of land for the project did not cause a loss of income or means of livelihood, since the contract between Atlantic and the owners was a contract for assignment of use of property and the terms stipulate that the assignors may continue to pursue the same activities on that land as before. In turn, the entrepreneur is paying financial compensation for the permission to use the areas for the project.

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

Impacts on vegetation were minor, given the anthropized state of the region. The intent of the Program for Recovery of Degraded Areas was to promote regrowth of vegetation in the areas that suffered temporary intervention for installation of the project. As mitigating measures, the licensing agency (FEPAM) required preservation of individuals of certain species protected by law (*Butia odorata*, *Ficus luschnathiana* e *F. cestrifolia*) by selective pruning or transplantation, as well as relocation of Bromeliads and cacti present in the areas of intervention.

As for fauna, the project area proved to be poor in number of species for most groups but even so, certain threatened, endemic and migratory species were reported.

The project region has a long history of human occupation and its vegetation currently corresponds to anthropized fields where habitats have been modified. Although some authors claim that many endemic of flora can be found in the Pampa biome, the project is situated in the region known as “coastal fields,” which is not recognized as an important center of floral endemism in the Pampa.

As for fauna, no “endangered” or “critically endangers” species were recorded. Only in interviews did anyone mention the *gato-de-mato* (*Leopardus tigrinus* – *oncilla*), which is classified as “endangered.” Although endemic bird species were recorded, of limited distribution and migratory habits, the information presented in the RAS does not permit an evaluation as to whether habitats of significant importance to these species were recorded. It is well known, however, that there are two migratory routes in the project area. The Atlantic Route is a national route and the Rio Grande do Sul Central Depression Route is a regional one.

During the operations phase, Atlantic must monitor the species of fauna, particularly the threatened, endemic, limited distribution, and migratory species. These species must be recorded, quantified, and their distribution in the project areas mapped. In the case of bats (another significantly affected group) bioacoustics monitoring must be used.

It is emphasized that the project is not situated in a Priority Area for Biodiversity Conservation - APCB of the Pampa biome, according to the Ministry of the Environment. Within a 10 km radius of the wind complex and the transmission line there are no legally protected areas (such as conservation units) or internationally recognized areas (such as Key Biodiversity Areas – KBA, Important Bird Areas – IBA, Important Plant Areas – IPA, or Alliance for Zero Extinction sites--AZE and Ramsar sites).

No invasive exotic species were introduced for the installation of the wind Farms complex and the transmission line, or plants or animals. However, the presence of one exotic species of fauna was recorded: a turtle known as the red-eared slider (*Trachemys scripta elegans*), whose original distribution encompasses the United States, Central America, Colombia and Venezuela. Since in this case the species in question is already present in the region of the proposed project, the client must take the proper steps to prevent it from spreading into areas where it is not already found and, when possible, take steps to eradicate that species from the natural habitats over which the client has managerial control.

Baseline studies do not indicate that the local population is engaged in plant or animal extractives activities in the region where the project will be introduced. Regulatory services, such as erosion control, were affected only sporadically within the project area. Monitoring to prevent and control erosion was conducted during the installation phase and should continue during the operations phase. During the provision of support services, ecological processes in the region of the project could be affected, as might changes in reproductive cycles.

#### **4.7 Cultural Heritage**

As assessment of the archaeological potential of the locality known as Espinilho, in Santa Vitoria do Palmar, was requested. The project area was considered as an area of direct impact and the municipality of Santa Vitoria do Palmar deemed as an area of indirect impact.

Archaeological monitoring was performed under the Cultural Heritage Monitoring, Preservation, and Education Program of the Aura Mangueira Wind Complex – Phase 1. A company, Arkeoambiental, was contracted for the purpose. Monitoring activities are still in progress, as of the time of aerogenerator pre-assembly.

The IPHAN (Brazil’s National Institute of Historical and Artistic Heritage) submitted an opinion in favor of approval of the Final Report and consent to the License for Operation (LO) for Wind Energy Parks MIR II, MIR IV, MAN VII, MAN XI, MAN XII, and MAN XV. The Final Report for Wind Energy Parks MIR VI, MIR VIII, MAN XIII and MAN XVII is being studied at the IPHAN, which has been asked to treat the matter as urgent.

#### **4.8 Local Access to Project Documentation**

Atlantic has made available to official agencies associated with environmental licensing-- namely FEPAM, IPHAN, and DEFAP/SEMA--all documentation pertaining to the project. However, it is not making information available to the general public and the population affected by the project. We emphasize that the Sustainability Policy and information about the company’s Environmental, Social and Corporate Governance – ESG can be accessed via the website <http://atlanticenergias.com.br/esg/>.

#### **4.9 Environmental and Social Action Plan (ESAP)**

The Environmental and Social Action Plan is presented as an **Annex** to this report.

**Santa Vitoria do Palmar Wind Farms Complex**

**Environmental and Social Action Plan (PAAS or ESAP)**

N°	ACTION	DELIVERABLES	TIME FRAMES
<b>PS 1. Environmental Management and Assessment System</b>			
01	Develop and implement within the Atlantic Environmental, Social and Corporate Governance System (ESG), a <b>Procedure for Internal Audits</b> in order to evaluate conformity with the environmental, social, and health and safety requisites of the following activities: i) Implementation of Environmental and Social Programs; ii) Electromechanical Construction and Assembly Activities; and iii) Operation and Maintenance Activities.	<ol style="list-style-type: none"> <li>1 Copy of approved Procedure</li> <li>2 Minutes of Critical Analyses from the Internal Audits approved and revised by Top Management of Atlantic</li> </ol>	<ol style="list-style-type: none"> <li>1 Before Signature of Contract (Closing)</li> <li>2 Apply the procedure every 6 months</li> </ol>
02	Develop and implement, in the context of the Sustainability Policy and the Atlantic ESG, a <b>Procedure for Decommissioning the Works</b> in order to ensure that demobilization of construction sites and supporting installations (job site as a whole, concrete center, fuel plant, wastes center, warehousing, administrative areas etc.) is properly executed. Procedure includes requirements for: i) demobilization of the entire infrastructure of installed facilities, including demolition and removal of floors, buried pipes, sewer chambers, etc.; ii) segregation, transportation and proper disposal of all wastes generated; iii) deactivation of the effluents treatment system; iv) Preliminary investigation of Polluted Areas (Phase 1); v) systemization of the terrain, execution of draining as appropriate and recovery of vegetative ground cover; and vi) return of the area to the owner, obtaining an " <i>Instrument of Acceptance</i> ".	<ol style="list-style-type: none"> <li>1 Copy of approved Procedure for Decommissioning the Works</li> <li>2 Report of Decommissioning and Instruments of Acceptance from owners of the areas</li> </ol>	<ol style="list-style-type: none"> <li>1 Before Signature of Contract (Closing)</li> <li>2 Apply the procedure on the occasion of demobilization of the service sites.</li> </ol>
03	Develop a <b>Manual of Environmental and Social Supervision and Monitoring</b> to apply to the implementation of environmental and social programs during the construction and operation phases and institutionalize it in the existing Management System. It must include the following requisites as a minimum: i) environmental, social and SST checklists; ii) requisites for conducting investigations into environmental and social incidents; iii) procedures for recording inspections, non-conformities, corrective and preventive actions; iv) environmental and social performance indicators, which must cover at least the following principal topics: a) compliance with conditions stipulated in environmental licenses and other legal obligations; b) basic and advanced training; c) stakeholder engagement; d) mechanism for consultation and complaints; and) occupational accidents, incidents, and diseases; f) environmental impacts and incidents; and g) citations and court proceedings; v) criteria for issuing periodic conformity reports; and vi) requirements for review and monitoring of environmental and social performance by top management of Atlantic	<ol style="list-style-type: none"> <li>1 Manual of Environmental and Social Supervision and Monitoring approved</li> <li>2 Implementation Report</li> </ol>	<ol style="list-style-type: none"> <li>1 Before Signature of Contract (Closing)</li> <li>2 Before Signature of Contract (Closing)</li> </ol>

N°	ACTION	DELIVERABLES	TIME FRAMES
04	Revise the <b><i>Contractual Guideline on the Environment</i></b> in order to include the following additional requisites: i) procedure for identification and assessment of environmental risks and impacts; ii) requirements for footprint management) iii) procedure for monitoring effluents, environmental noise, particulate material, electromagnetic radiation, etc.; iv) procedure for management of hazardous products, including criteria for installation and operation of the fuel plant, repair shop, storage of hazardous products, etc.; v) criteria for efficient use of resources, particularly water and electricity; vi) requisites for decommissioning of installations and construction sites and recovery of degraded areas; vii) requisites for treatment of non-conformities and corrective and preventive actions; viii) key environmental performance indicators (KPI); ix) requirements for issue of periodic reports; and x) review by Atlantic	1 Revised Guideline	1 Before Signature of Contract (Closing)
05	Submit a procedure with guidelines used by Atlantic for determination and evaluation of suppliers considered critical in terms of environmental, social, and occupational health and safety issues (transportation and disposal of wastes and effluents, suppliers of construction aggregates, suppliers of chemical de products, suppliers of O&M labor, etc.). Procedure should be developed for management of corrective action.	1 Procedure	1 Before Signature of Contract (Closing)
06	In the context of the Atlantic Sustainability Policy and ESG, submit a procedure for Management of Change - MOC that ensures that all changes in the project or in programs and environmental and social measures are the subject of systematic evaluation, in the form of an analysis of alternatives and incorporation of assessment of environmental and social impacts in decision-making.	1 Procedure. 2 Evidence of the application of the procedure.	1 Before Signature of Contract (Closing) 2 When pertinent
07	In the context of the Atlantic ESG, implement a systematic method for identifying legal requirements and other requisites applicable to the phases of planning, construction and operation, as well as methodology for evaluation of conformity of the project in terms of the requirements identified.	1 Procedure and evidence of its application	1 Before Signature of Contract (Closing)
08	Conduct an additional campaign to survey fauna, considering the seasonality required by Performance Standard 01. The campaign should consider a sampling effort that is consistent with the size of the undertaking. For surveys of winged fauna, methodology should be used that contemplates use of bioacoustics. Records of the principal groups of affected fauna (birds and bats) should be plotted on a map of the project.	1 Submit a Plan of Work for the Campaign to be conducted; 2 Submit results obtained from the campaign	1 Before Signature of Contract (Closing). 2 According to necessary seasonality
09	Indicate the human resources (number and qualifications) assigned to management of health, environment and safety (SMS), as well as to the social issues and communications with stakeholders in each stage of the process of installation of the Santa Vitoria do Palmar Wind Farms Complex. Those professionals should be made responsible for application of all the internal assurance procedures for the Wind Farm Complex, such as internal auditing, system for treatment of non-conformities, and definition and control of corrective and preventive actions.	1 Responsibilities Matrix, with details on the functions performed by each professional .	1 Before Signature of Contract (Closing)
10	Establish a social team for Atlantic, responsible for the Stakeholder Engagement Policy and all its actions, supervision and documentation of procedures and follow-up of the results.	1 Submit list of members of the social team.	1 Upon signature of the Contract (Closing)

N°	ACTION	DELIVERABLES	TIME FRAMES
11	Submit an Emergency Response Plan (PRE) for the operations phase of the project that contemplates all possible risk scenarios. Special attention should be paid to medical emergencies and first aid services involving rescues at heights and risks related to crop dusting that occurs at the same time as project operation. In the specific case of crop dusting operations, the PRE must establish a matrix of responsibilities that includes all interested parties (Atlantic, property owners, agricultural flight services, and others), clearly defining the scope of the preventive actions, emergency response actions, and emergency care infrastructure that each interested party must assume.	1 Emergency Response Plan.	1 Prior to the first disbursement
12	Submit the Periodic Environmental and Social Reports (RSAP), with the minimum content and frequency to be defined by the Financial Institution, Atlantic and the Independent Environmental and Social Consultant (CSI).	1 Reports	1 Frequency to be determined by the IIC, Consultoria and Atlantic
13	Submit a mapping of stakeholders with suitable analysis and planning for engagement with them. The same should be carried out, adhering to the Stakeholder Engagement Policy outlined in the Atlantic Sustainability Management System Manual.	1 Mapping of stakeholders	1 Prior to the first disbursement
14	integrate the following changes into the Engagement Policy: i) continuous monitoring and consultation with affected property owners in order to verify that they correctly understand the procedures for negotiating the use of their lands and the payment of compensation; and record their demands and responses to them; ii) methods of documenting the activities and processes involved in stakeholder engagement, making it possible to verify the content of the relationships and concerns or changes in engagement, as well as to follow up on the indicators proposed in the Stakeholder Matrix; iii) procedure for follow-up on social projects and documentation of evaluation of the aforementioned indicators; and iv) an Atlantic social team, responsible for the Stakeholder Engagement Policy and all its actions, supervision and documentation of procedures, and follow-up on results.	1 Revised Policy of Engagement	1 Before Signature of Contract (Closing)
15	Submit a Plan for Communications and Media with the Communities for the operations phase, including the team necessary to carry out the plan, to include: i) plan for management of specific social aspects of the project operations phase; ii) the internal and external communications plan designed to inform the communities and workers about the operations activities; and iii) measures for managing potential social conflicts.	1 Submit the Plan for Communications and Media with the Communities for the operations phase	1 Prior to the first disbursement
16	Adopt a mechanism by which an ombudsman will be available during the operations phase, including a definition of procedures for formalizing a system for recording and managing complaints and claims by interested parties regarding the project. The mechanisms of communication adopted shall: i) ensure easy access by interested parties; ii) maintain confidentiality of the identity of requesting party; iii) proper recording of requests, responses, and actions taken; iv) resolve concerns promptly, using a process that is readily understandable and transparent, culturally appropriate, and accessible by all segments of the affected communities; and v) provide at least two administrative levels to hear complaints, the second level to involve participation by independent / impartial parties.	1 Evidence of the implementation of an ombudsman 2 Evidence of the publicizing of the existence of an ombudsman	1 Prior to the first disbursement 2 Prior to the first disbursement
17	Influence the owners of land located inside the SVP Wind Complex to restrict crop dusting to areas well away from the aerogenerators, in order to minimize the risk of collisions.	1 Evidence of meetings, copies of letters, etc.	1 Prior to the first disbursement.
18	Propose a <b>Communication Protocol</b> that ensures that land owners notify the Company in advance of the date and time of crop	1 Communication Protocol	1 Prior to the first disbursement.

N°	ACTION	DELIVERABLES	TIME FRAMES
	dusting operations, with a view to ensuring that all workers can be evacuated from areas where there is a risk of contamination.		
19	Develop a procedure for communication with land owners in the leased areas that describes the principal questions that have been raised in contacts with them, accompanied by the respective responses, for inclusion in a <i>Questions and Answers</i> script to be used by the professionals who work with that directly affected population. Widely publicize the adopted mechanism to the affected population in communications during operations.	1 Communication Procedure; 2 Evidence of dissemination	1 Prior to the first disbursement. 2 Prior to the first disbursement.
<b>PS 2. Labor and Working Conditions</b>			
20	Develop a procedure that includes: i) identification of potential risks for workers, especially risks that could be life-threatening; ii) adoption of preventive and protective measures, including modification, replacement or elimination of hazardous conditions or substances; iii) worker training; iv) documentation and notification of occupational accidents, diseases and incidents; and v) agreements on prevention, preparation, and response to emergencies.	1 Procedure	1 Before Signature of Contract (Closing)
21	Develop a procedure for inspecting and monitoring suppliers and subcontractor companies situated both within the project area and outside of it.	1 Procedure	1 Before Signature of Contract (Closing)
22	Consolidate the social requisites present in the Sustainability Policy and the ESG in the form of a contractual guideline to be annexed to the outsourcing contracts with subcontractors.	1 Contractual Guideline to be attached to the contracts signed with subcontractors	1 Before Signature of Contract (Closing)
23	Formalize procedures relating to management of working conditions prevailing among subcontractors in order to ensure adherence to the Atlantic Human Resources Policy.	1 Procedures for management of the working conditions prevailing among the subcontractors	1 Before Signature of Contract (Closing)
<b>PS 3. 4.3 Resource Efficiency and Pollution Prevention</b>			
24	Carry out monitoring of the sources of pollution issued during the operations phase (noise, vibration, electromagnetic fields and stroboscopic effects) complying with the maximum limits required in Brazilian legislation and those established in the EHS Guidelines adopted by the IFC, and adopting the most restrictive as reference for the project.	1 Results of the monitoring compared with legislation and IFC Performance.	1 According to seasonality required for the Operations Phase
<b>PS 6. 4.6 Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>			
25	Submit a plan of work for the monitoring of migratory/endemic species of birds, so as to assess the extent of their occupation in the project area, trace the possible routes used by these species and their areas of feeding and nesting in areas near the lagoon.	1 Plan of Work for the Monitorings; 2 Results of the Periodic Monitorings	1 Prior to the first disbursement; 2 According to frequency defined in the Plan of Work and approved by the IIC.
26	Carry out bioacoustics monitoring of bats, evaluating the species observed in the area and the use of the project areas by these species	1 Plan of Work for the Monitorings; 2 Results of the Periodic Monitorings	1 Prior to the first disbursement; 2 According to frequency defined in the Plan of Work and approved by the IIC..

N°	ACTION	DELIVERABLES	TIME FRAMES
27	Carry out monitoring of carcasses of winged fauna (birds and bats) resulting from possible collisions with aerogenerators s and transmission lines according to the World Bank Group document entitled Environmental, Health, and Safety Guidelines Wind Energy.	1 Results of the Periodic Monitorings.	1 According to frequency defined in the Plan of Work and approved by the IIC.