

## Environmental and Social Review Summary

### Hospital de Manta Project

Original language of the document: Spanish  
Cutoff date for review: July 2019

#### A. Investment Summary tab (provided by the Team Leader)

**Disclosed Date:**

**Project Name:** Hospital de Manta

**Project Number:** 12360-01

**Investment type:** Loan

**E&S Category:** B

**Projected Board Approval Date:** November 5, 2019

**Company:** Hospital Especialidades Umiña Hospiumiña S.A. ("Hospital Umiña")

**Sponsoring Entity:** Grupo Corporativo Visión

**Sector:** Health

**Financing Requested:** 16,900,000

**Financing Currency:** US\$

**Project Country:** Ecuador

**Team Leader:** Olga Lucía De Narváez

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#### B. Environmental and Social Review Tab

##### 1. Scope of Environmental Review

The Hospital Especialidades Umiña, Hospiumiña S.A. "Hospital Umiña" ("Hospital de Manta" or "the Project"), covers the construction and operation of a hospital facility that includes 47 hospital rooms, 2 delivery rooms, 8 ICU (intensive care unit) beds, 5 neonatal bassinets, 4 operating rooms, 10 post-surgery recovery beds, 10 emergency unit stretchers (2 pediatric). The gross construction area of the project is 11,259 m<sup>2</sup> and it will be located in the province of Manabí, Manta district, in a residential area (Barrio

Umiña). The Project will be implemented in lots C and D<sup>1</sup>, with an area of 5,357 m<sup>2</sup> and 5,122 m<sup>2</sup>, respectively, owned by HOSPIUMIÑA Compañía Anónima<sup>2</sup>. Construction will take place in approximately 12 months.

The proponent of the Project is Grupo Visión (hereinafter “the Proponent”), through its company Renazzo Holding. The Proponent expects to contract with companies that specialize in hospital infrastructure and operation for both the construction and operation phases of the Project.

The Environmental and Social Due Diligence (ESDD) process included the review of relevant information in the city of Quito, on October 17, 2018, plus a site visit that was carried out in two parts: The first on October 18 and the second between October 28 and 29, 2018 in the cities of Manta and Portoviejo.

The administrative, health (epidemiologist) and public service staff of the *Hospital General del Instituto Ecuatoriano de Seguridad Social* (General Hospital of the Ecuadorian Institute of Social Security - IESS, for its acronym in Spanish) of Portoviejo were interviewed as part of the ESDD process. Residents living in the vicinity of the Project, as well as other relevant stakeholders such as the mayor of the city of Manta and the president of the Umiña Tennis Club, were interviewed during the Manta city site visit. In addition to IDB Invest’s Environmental and Social Officer, technicians from CHARLIEG Ingeniería, an independent environmental and social consulting firm, participated in the site visit.

The environmental and social documents reviewed include: i) Environmental Impact Assessment (EIA); ii) complementary technical baseline studies; and iii) engineering studies.

## 2. Environmental and Social Categorization and Rationale

This is a Category B Project under IDB Invest’s Environmental and Social Sustainability Policy, given that its environmental and social risks and impacts are confined to the Project facilities, are generally reversible, and are capable of being mitigated with easily applied management measures during its construction and subsequent operation. Salient environmental and social risks include: i) possible impacts on the local community; ii) an increased risk to the health, safety and security of workers and the community; iii) an increase in vehicular traffic during both construction and operation; and iv) the generation of hospital waste during the operation stage.

There are no indigenous communities that could be affected by the Project. In addition, its area of influence does not overlap with any nationally designated or internationally recognized protected areas. Although the city of Manta is a region with high archaeological sensitivity, the Project area does not overlap with settlements of the pre-Columbian Manteña culture.

The Project triggers the following Performance Standards (PS): i) PS 1: Assessment and Management of Environmental and Social Risks and Impacts; (ii) PS 2: Labor and Working Conditions; iii) PS 3: Resource Efficiency and Pollution Prevention; iv) PS 4: Community Health, Safety and Security and v) PS 8: Cultural Heritage.

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1 These areas were subdivided from a 27,513 m<sup>2</sup> macro lot, land registry file 29472 of the Manta Property Rights Register, Lot C, land registry code No. 1162406000.

2 A Grupo Visión company.

### 3. Environmental and Social Context

The Project is under the political-administrative jurisdiction of the Municipality of Manta, in the Umiña quarter, on the road to Barbasquillo, on the west side of the Umiña Tennis Club. The sector is predominantly urban, with paved streets and utilities such as public lighting, sewer system and drinking water, although the latter is insufficient to satisfy the sectoral demand. For this reason, the Project's water supply will be supplemented via tanker trucks. The area can be considered as mixed residential, with commercial and tourist areas.

The location is neither a critical habitat nor a special or unique ecosystem. *“The overall sensitivity of the biotic component was determined to be low, since the number of species is limited and therefore no fragile ecosystems exist... This location is an altered area”.*<sup>3</sup>

### 4. Environmental Risks and Impacts and Proposed Mitigation and Compensation Measures

#### 4.1 Environmental and Social Assessment and Management System

The Proponent has developed an Environmental, Social, and Health and Safety Management System (ESMS) and has established standard guidelines on Health, Safety, Security and the Environment that shall be followed by its contractors and subcontractors. The corporate ESMS and related commitments have been developed by the Promoter in the months following the due diligence visit.<sup>4</sup> For this purpose, the Project hired an external consulting firm,<sup>5</sup> which, upon a performance assessment, could be in charge of implementing the system for both the construction and operation phases.

As a result of the ESDD process, the corresponding EIA<sup>6</sup> has been updated to include a better description of the Project and a supplemented baseline,<sup>7</sup> which lacked details regarding the biotic and social components in the Project area of direct influence. The baseline was supplemented with the following chapters: (i) geology, (ii) soils, (iii) climate, (iv) hydrology, (v) water quality, (vi) air quality, (vii) environmental noise, (viii) flora, (ix) wildlife, (x) social baseline and (vi) archaeology.

Although the corresponding EIA was approved on June 28, 2019, by the Decentralized Autonomous Government (DAG) of the Province of Manabí in its capacity as the Environmentally Responsible Application Authority (AAAr, for its acronym in Spanish), the Project lacks the respective environmental permit.

#### 4.1.a Policy

The ESDD process was unable to identify a document that describes the specific policies for issues relating to environmental, health, safety and security principles and the Project's driving labor and social objectives and principles in line with PS 1. As on the date of this disclosure, however, the Promoter had

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3 José Merchán, Environmental Impact Study for the construction of the Hospital de Especialidades Umiña, March 2018, p. 58

4 See the document SGAS - HU - SGAS - 001\_SISTEMA DE GESTIÓN AMBIENTAL Y SOCIAL\_ver\_0 published on this website

5 ESINGECO CIA LTDA consulting firm

6 See document disclosed on this website: SGAS - HU - DP - 00\_DESCRIPCION DEL PROYECTO\_ver\_0

7 See document disclosed on this website: SGAS - HU - LB - 001\_LÍNEA BASE AMBIENTAL Y SOCIAL\_ver\_0

already developed and approved a corporate Environmental and Social Policy as part of its ESMS, the general principles of which are in line with PS 1.

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

The EIA includes the main impacts of the Project yet lacks a detailed analysis of the risks or impacts on its entire area of direct and indirect influence. Similarly, while it identifies geological and tectonic risks (earthquakes and seismic activity), the study fails to perform an analysis of the importance or probability of occurrence such risks, nor does it include the risk of flooding or tidal waves (tsunamis).

To solve these analysis gaps and propose mitigation measures, the Promoter has carried out the following supplementary studies: i) Impact and Risk Assessment (IRA);<sup>8</sup> ii) Supplementary Soil Mechanics Study (SSMS),<sup>9</sup> and iii) Cumulative Impact Analysis (CIA).<sup>10</sup>

The initial Soil Mechanics and Geophysical Prospecting Study conducted by the Promoter determined that the soil in the Project implementation site has a medium bearing capacity, no groundwater table (the study was conducted during the summer), is medium-expansive, and presents the possibility of liquefaction in the event of a seismic disturbance in the presence of a groundwater table. All this, coupled with the information gathered during the site visit,<sup>11</sup> indicates that the site in question is highly vulnerable should a medium-intensity earthquake occur in winter (with saturated soils).

The IRA, for its part, has identified the following risks, both natural and anthropogenic: i) high risk: earthquakes; ii) medium intensity risks: a) tsunami followed by a seismic event, which could cause the waves to reach the level of the constructed hospital; b) flooding due to the overflow of natural drainage resulting from heavy rainfall; c) land- and rockslides from the hill adjacent to the Project site; d) overflow due to obstruction of the natural watercourse near the future hospital; e) spills and fires, either due to industrial safety conditions or the dryness of the natural vegetation of the nearby forest; and iii) low risk: increased vehicular traffic.

The hydrological and hydraulic analysis of the Barbasquillo Creek, to which the rainwater from the site would be discharged, states that the public drains have a lower flood evacuation capacity even for five-year return periods. This results in a high risk of flooding of the corresponding microbasin, a situation that could affect the structure of the hospital.<sup>12</sup>

Nevertheless, the SSMS conducted in June 2019 concludes that, since the foundation slabs are expected to be placed at depths of 8 to 10 meters (m) in lime-clay soils whose *"liquefaction potential... is very low"*, the probability of collapse due to liquefaction in the event of seismic activity is extremely low. The elevation of the proposed foundation is also below -5.00 m, where groundwater was found, presumably as a result of leakage from the city's rainwater collection system, which crosses the land and could collapse due to insufficient carrying capacity. Should the foregoing be confirmed, during construction deep sub-drains would be installed to reduce the water table and minimize risks.

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8 See documents disclosed on this website: SGAS - HU - EI - 001\_EVALUACION DE IMPACTOS AMBIENTALES y SGAS - HU - ER - 001\_EVALUACION DE RIESGOS\_ver\_0

9 See document disclosed on this website: Supplementary Soil Mechanics Study - June 2019

10 See document disclosed on this website: SGAS - HU - EGIA - 001\_ EVALUACION Y GESTION DE IMPACTOS ACUMULATIVOS\_ver\_0

11 This information indicates the existence of periodic groundwater upwellings in the courts of the Umíña Tennis Club.

12 The Project's pre-feasibility reports were approved by the Manta Public Drinking Water Company (EPAM, for its acronym in Spanish) on August 1, 2018.

Likewise, the SSMS recommends avoiding surface water leakage that affects the soil bearing capacity by constructing sidewalks, curbs and drainage works, in addition to access chambers, gutters and a rainwater collection channel that will divert surface runoff water to the main storm sewer system.

The SSMS furthermore suggests adopting conservative safety criteria in the design and construction of subfloor retaining walls, together with safety measures to be implemented during the excavation process.

It should be noted that, given that the Project premises have access to the city's sanitary sewage system, which is also managed by the Manta Public Drinking Water Company (EPAM, for its acronym in Spanish), this network is independent of the surface runoff water collection system.

The CIA has identified the impacts derived from the contribution of rainwater by neighborhoods and real estate projects over the western - eastern and northern - southern tributary watershed of the city up to its mouth to the sea as being of high magnitude and significance, since the project site is located on low and flat terrain at the confluence of both micro-watersheds, with a risk of flooding due to: i) increased runoff from land use changes; ii) limited actual possibility of drainage; and iii) constraints due to the water flow in the reservoir under the Barbasquillo road being blocked.

To mitigate this impact, an increase in the carrying capacity under the Barbasquillo road via the construction of an additional water crossing and the necessary aqueducts to convey the water to the sea is proposed. The Promoter has agreed to take additional actions, in conjunction with the EPAM, the local government of Manta—the DAG—and the properties neighboring the Project, including the Umiña Tennis Club, to provide a long-term solution to this problem.

#### **4.1.c Management Programs**

The ESMS for the Project construction phase has been designed in compliance with the requirements of Ecuadorian legislation and in a manner consistent with ISO 14001 and OHSAS<sup>13</sup> 18000 standards (for the environment; and health, safety and security, respectively). The Promoter, together with the Project Environmental and Social (E&S) consultant, will develop the ESMS for the venture's operation phase.

The management programs that will be implemented by the ESMS include: i) identification and assessment of environmental and social impacts; ii) identification of environmental and social risks; iii) prevention and mitigation; iv) contingencies and emergencies; v) stakeholder engagement; vi) waste management; vii) industrial safety and occupational health; and viii) organizational capacity and competency.

Due to its nature as a generator of hazardous biological waste, the Project will require qualification as such under Ecuadorian regulations.<sup>14</sup>

#### **4.1.d Organizational Capacity and Competency**

The Project proposes a 4-level organizational structure for the construction phase (with its corresponding responsibilities and competencies): i) General Management; ii) Project Management; iii) ESMS Coordination; and iv) Technical and Operational Level. The person responsible for the ESMS will report to the Project Management, will undertake the planning and control functions of the ESMS, and will be in

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<sup>13</sup> The OHSAS 18000 (Occupational Health and Safety Assessment Series) standard contains a series of occupational health and safety standards. The standard itself has two parts: i) OHSAS 18001, which focuses on specific occupational health and safety management systems; and ii) OHSAS 18002, which provides guidelines for the application of OHSAS 18001.

<sup>14</sup> Ministerial Agreement 061, Article 88

charge of competent personnel, taking into account their education, training, and experience, so as to be accountable to the Project Management and Control Authorities.

#### **4.1.e Emergency Preparedness and Response**

The Environmental Management Plan contained in the EIA considers the Contingency Plan. The Project, however, has developed a specific Contingency and Emergency Plan intended to protect the environment, infrastructure, equipment and human resources involved in the Hospital de Manta Project activities throughout its different stages.

#### **4.1.f Monitoring and Review**

The EIA details the environmental parameters that shall be monitored but fails to define the frequency or in which Project stages this will take place (construction and operation). The Promoter has therefore developed—and included in the ESMS—a Monitoring and Review Procedure<sup>15</sup> with the verification matrices of the physical and biotic factors to be monitored in order to comply with national legislation and PS 1. Furthermore, these matrices detail the required frequency and the corresponding means of verification.

The Project will be routinely monitored by an Independent Environmental and Social Consultant hired by IDB Invest and by the latter's environmental and social team, as well as by the national environmental authorities.

#### **4.1.g Stakeholder Engagement**

The Proponent has structured a social baseline of the Project areas of direct and indirect influence that identifies and captures the perceptions and sensitivities of the relevant stakeholders and their engagement mechanisms. A Public Participation Process was also carried out<sup>16</sup> as part of the EIA approval process, in which most of the Project's relevant stakeholders took part.

The Stakeholder Engagement Program<sup>17</sup> contains, for each phase of the Project, a list of activities intended to forge and maintain a constructive relationship with stakeholders throughout the Project's lifetime, including a stakeholder grievance mechanism called the Petitions, Grievances, Complaints, and Requests (PGCR) Subprogram.

### **External Communications and Grievance Mechanisms**

The EIA contains a communications program; however, it fails to detail activities related to institutional or community communications that ensure the principles of information and free access to it, in order to guarantee the procurement of suitable information and promote stakeholder engagement processes.

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<sup>15</sup> See document disclosed on this website: SGAS - HU - LVC - 001\_VERIFICACIÓN DE IMPACTOS EN LA FASE DE CONSTRUCCIÓN\_ver\_0.

<sup>16</sup> See the EIA documents disclosed on this website: i) DESCRIPTION OF THE PUBLIC INFORMATION CENTER, ii) PUBLIC PARTICIPATION PROCESS SYSTEMIZATION REPORT, and iii) SUBMISSION OF ISSUES ADDRESSED DURING THE PUBLIC ASSEMBLY.

<sup>17</sup> See document disclosed on this website SGAS - HU - PPS - 001\_PROGRAMA DE PARTICIPACION SOCIAL\_ver\_0

The Project has adopted the PGR system used to receive, process and resolve requests, grievances, complaints, and suggestions (in particular to improve socio-environmental management). This system contains mechanisms to capture and process internal and external grievances and requests during the Project's Construction and O&M phases.

## **4.2 Labor and Working Conditions**

### **Labor Conditions and Management of Worker Relationships**

The Industrial Safety and Occupational Health Program (ISP) devised by the Proponent for the Project's construction phase, whose main objective is to ensure compliance with existing legislation<sup>18</sup> in matters of Industrial Safety and Occupational Health, contains: i) guidelines to prevent occupational hazards and maintain the good health of workers, to prevent both diseases and accidents, and ii) occupational health and industrial safety standards that contractors must comply with during the execution of their activities.

The ISP, whose responsibility for execution lies with the Promoter, contains instructions for full compliance by Project constructor and operator with the minimum standards to ensure the health and safety of its personnel. It includes, among others: i) conditions for the delivery and replacement of personal protective equipment (PPE); ii) risk analysis procedures; iii) work permit procedures; iv) load lifting procedures; v) measures for work at heights; vi) requirements for the operation of machinery and equipment; vii) methods for reporting occupational accidents and incidents; and viii) emergency medical care procedures.

By the time the ESDD process was conducted, the Promoter had yet to adopt an Occupational Health and Safety Policy,<sup>19</sup> lacked estimates for the required workforce, and had not defined the percentage of participation or the most likely source for unskilled labor. Upon reviewing the Suppliers and Contractors Manual, however, it transpired that it contains guidelines for hiring qualified and unqualified local labor (QL and UL, respectively), prioritizing the use of available human resources in the Project's direct or indirect area of influence.

#### **4.2.b Protecting the Workforce**

Contracts signed between the construction company, its subcontractors, and employees must comply with local legislation and be submitted to and approved by the Ministry of Labor of Ecuador. The Suppliers and Contractors Manual<sup>20</sup> sets forth the obligation for contractors and subcontractors to comply with Ecuadorian labor laws<sup>21</sup> which, among other aspects, provide for non-discrimination, equal opportunity and the prohibition of child and forced labor.

It should be noted that no evidence of the possible existence of child labor or forced labor was detected during the ESDD process.

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<sup>18</sup> Basically, the Health Code, the Regulations on Occupational Health and Safety, and the Improvement of the Working Environment, R.O. 2393.

<sup>19</sup> Policy that includes the following principles: i) security is not negotiable; ii) the identification and assessment of hazards and risks in every workplace; and iii) high safety levels. This policy should also take into consideration that smoking is prohibited in all areas of the Project, and that there is zero tolerance of both alcohol consumption and drug use in the workplace.

<sup>20</sup> See document disclosed on this website: SGAS - HU – MPC - 001\_MANUAL DE PROVEEDORES Y CONTRATISTAS\_ver\_0.

<sup>21</sup> Labor Code, Chapter VII Art. 134.

#### **4.2.c Occupational Health and Safety**

The EIA contains only general guidelines on the provision of security equipment and a risk matrix for each area and activity. However, the ISP, which is applicable to all direct employees, contractors, and subcontractors, contains the following management programs required to prevent and mitigate risks, and guarantee workers a safe and healthy work environment: (i) communication; (ii) personnel provisions; (iii) machinery and equipment; (iv) personal protective equipment (PPE); (v) signage; (vi) disease prevention; (vii) emergency response; and (viii) treatment of occupational diseases.

#### **4.2.d Workers Engaged by Third Parties**

At the time of the ESDD process, the Project lacked a procedure to evaluate contractors and service providers in terms of the environment, health, safety, and security. The Suppliers and Contractors Manual, however, which aims to define criteria for the behavior of suppliers and contractors that provide services inside or outside the Project facilities, contains a series of legal, ethical, social, industrial safety, occupational health, and environmental guidelines to ensure that every supplier and contractor complies with Ecuadorian legislation and with all the guidelines set forth in the ESMS.

### **4.3 Resource Efficiency and Pollution Prevention**

#### **4.3.a Resource Efficiency**

The Project will implement state-of-the-art technological systems designed to achieve, among others, a lower and more efficient energy consumption (more efficient electrical and air conditioning systems, low energy consumption lights with motion sensors and timers, etc.), and to consume less water (use of hydro-sanitary appliances and accessories with lower water consumption).

The Promoter will prepare and implement a specific Resource Efficiency Plan that identifies objectives and goals for the conservation of raw materials, water consumption, energy consumption, and the minimization of waste generation (domestic and hazardous).

Since drinking water in the Barbasquillo neighborhood (provided by the public supply system, in charge of the EPAM) does not cover 100% of the population, water will be supplied to the Project via tanker trucks that will deposit the water in a cistern and subsequently distributed through a pumping system. The Project will have its own drinking water plant for hospital use, which will guarantee the necessary output parameters for this activity.

The Project will connect directly to the power grid operated by *Compañía Nacional de Electricidad* (National Power Company - CNEL, for its acronym in Spanish). As a backup, and to ensure the flow of electricity in key sectors of the hospital in the event of a power outage in the public grid, the Project will have back-up power generators.

#### **4.3.b Pollution Prevention**

The EIA contains a Hazardous Waste Management Plan that specifies the actions to be followed to handle this waste. As a complement, the Promoter has developed a Waste Management Program (WMP) for the management and final disposal of liquid waste (domestic and industrial) and solid waste (conventional

and hazardous) for the construction stage, which specifies: i) the persons responsible for waste management; ii) actions to minimize waste production; and iii) procedures for its storage, classification, and final disposal. Although compliance indicators have yet to be developed,<sup>22</sup> the WMP contains impact checklists and specifies means to verify proper waste management and waste traceability indicators from generation to final disposal.

The WMP further provides that the Project Promoter, constructor, and operator shall be registered as hazardous waste generators, pursuant to Ministerial Agreement 026 of the Ministry of the Environment.

After treatment in a treatment plant to be implemented for the Project, both domestic and hospital wastewater will be discharged to the city's sanitary sewer system, whose pipeline crosses the front of the hospital grounds (south of the premises).

The ESDD was unable to identify the control and monitoring measures needed to assess the operation of the water treatment systems to be implemented as part of the Project: sewage and hospital water and drinking water. The Proponent, however, has agreed to address this issue once the engineering details of these plants and the equipment to be used by the hospital have been established.

The EIA contains a noise and air quality baseline and proposes semiannual monitoring of these environmental factors during the construction stage.

The noise measurement carried out in February 2019, following the recommendation of the first ESDD visit, revealed environmental values higher than the allowable limits (both local and of the IFC) both during the day and at night, basically due to the high volume of vehicular traffic in the area. Although the Project will not generate noise (except for that produced by ambulance sirens, which will be sporadic and brief), it is likely that it will have to implement an acoustic insulation system to avoid any impact on patients and workers.

As far as air quality is concerned, the analyzed parameters fully comply with the local and international permissible maximums.

#### **4.4 Community Health, Safety and Security**

The CIA has identified that the impact of flattening or levelling the terrain for the construction works through excavations and fillings has the highest level of hierarchy for the community. In this sense, the Promoter shall undertake the construction and improvement of the Project's storm drainage system and communicate and coordinate actions with the directors of the neighboring property, the Umiña Tennis Club, with which it shares the rainwater contribution of the main drainage channel.

In the O&M phase, the impacts that are highly significant for the community are: i) a possible decrease in the quality of the urban sanitary sewage system due to the discharge of hospital wastewater (hospitalization, laboratories, morgue, laundry, etc.) in the event of a possible failure of the planned treatment plant; ii) an increase in vehicular traffic (suppliers, patients, ambulances, etc.) at the Project's entry and exit to Barbasquillo road; and iii) the management of domestic and industrial solid waste.

To mitigate these impacts and reduce the risks to the community, the Promoter will execute a Stakeholder Engagement Program, whose objectives are: i) to mitigate social impacts, in order to prevent and manage conflicts associated with the Project; ii) to cause the least environmental impact to avoid affecting the

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<sup>22</sup> The indicators will be developed once the Project construction and O&M contractors are defined. However, measures have been defined for the identification, separation, classification, storage and final disposal of each type of waste. The ESMS shall allow for the traceability of the waste from generation to final disposal and define the means of verification of waste management.

socioeconomic activities of the community surrounding the Project; iii) to contribute to and promote the social development of the population involved in the Project's activities; iv) to implement mechanisms to receive and resolve petitions, grievances, complaints and requests (PGCR); and v) to inform the community in the Project's area of direct environmental influence of the actions included in the contingency and emergency plan.

The Project-specific Contingency and Emergency Plan, conceived as an administrative, organizational and operational tool used to respond to natural or operational contingencies, contains emergency prevention, organization and response measures that seek to protect human lives, the environment, and the infrastructure and equipment involved in the Project's activities.

Based on the Proponent's experience with other projects, it is highly probable that a security company will be hired to protect the Project's assets and personnel during the construction and operational phases. To this end, it will ensure the adoption and implementation of good practice principles relating to the use of security forces by contractors and/or subcontractors of the same, including the preparation and implementation of protocols to safeguard the integrity of the community, adherence to human rights and a response proportional to each threat, including specific training in these principles and the adoption of a code of conduct for security guards (in the event of the use of lethal or non-lethal weapons).

#### **4.5 Cultural Heritage**

Given that the EIA does not contain a description of the archaeological component and that the city of Manta is located in a region with high archaeological sensitivity,<sup>23</sup> the Promoter has carried out a diagnostic study and an archaeological survey<sup>24</sup> to develop recommendations and eliminate, mitigate or compensate possible impacts on cultural heritage. These activities resulted in the discovery of ceramic fragments<sup>25</sup> with features associated with the late occupation of the Manteña culture (Integration period). Both activities were conducted with the approval and consent of the National Institute of Cultural Heritage (INPC, for its acronym in Spanish).<sup>26</sup>

#### **5. Local Access of Project Documentation**

To date, the Proponent has not made available to the public any Project-related environmental or social information, except for general and commercial information that refers to a medical clinics project located on the premises adjacent to the Project. (see <https://renazzo.ec/proyectos/uminamed/>)

#### **6. Environmental and Social Action Plan (ESAP)**

The table below summarizes the content of the Environmental and Social Action Plan (ESAP):

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<sup>23</sup> The Manteña Culture (600 to 1534), a pre-Columbian culture from the coastal region of Ecuador that populated the geographical areas of today's Bahía de Caráquez to the Cerro de Hojas between present-day Manta and Portoviejo, in the south of the Province of Manabí, settled there. The chronology that has been determined for this culture extends from approximately 600 CE until 1534, when Pedro de Alvarado explored the area. In 1535, when Francisco Pacheco founded the city of Portoviejo, he made a long exploration journey along its adjacent coasts.

<sup>24</sup> See document disclosed on this website: SGAS - HU - LB - 001\_LÍNEA BASE AMBIENTAL Y SOCIAL\_ver\_0, component: ARCHAEOLOGY

<sup>25</sup> Material of minor archaeological importance, consisting of fine paste ceramics labelled in specific sectors, with no evidence of any cultural occupation.

<sup>26</sup> See documents disclosed on this website: Aprobación INPC\_prospección y Aprobación IPNC\_diagnóstico.

## 12360-01 Hospital Umiña - Ecuador

### Environmental and Social Action Plan (ESAP)

No.	Action	Final Product/Deliverable	Expected Completion Date
<b>PS 1: Assessment and Management of Environmental and Social Risks and Impacts</b>			
1.1	Adopt an Environmental, Social, and Health, Safety and Security Management System (ESMS) for both the construction phase and the operation phase, in keeping with: Performance Standard 1 (PS 1), corporate environmental strategies and the World Bank's General Environmental, Health, and Safety Guidelines.	<ol style="list-style-type: none"> <li>1. E&amp;S Assessment and Management System. Construction Phase</li> <li>2. E&amp;S Assessment and Management System. Operation Phase</li> </ol>	<ol style="list-style-type: none"> <li>1. 30 days prior to the start of the construction phase</li> <li>2. 60 days before completion of construction</li> </ol>
1.2	Submit the Project's Environmental Permit.	Copy of the Environmental Permit	Prior to the first disbursement
1.3	Submit the Project's qualification as a hazardous waste manager under Ecuadorian regulations (Ministerial Agreement 061, Art. 88).	Copy of its registry as a hazardous waste generator	30 days prior to the completion of the construction phase
1.4	Submit the design reports and operating manuals of the wastewater and drinking water treatment plants.	Design Reports and Operation and Maintenance Manuals	30 days prior to the start of the construction phase
1.5	Submit an Environmental Management Plan (EMP) for the Project, differentiated into the construction and operation phases, which includes, at least, the following plans, programs, and activities: i) impact prevention and mitigation plan (PMP); ii) contingency and emergency plan (CEP); iii) occupational health, safety and security plan (OHSP); iv) waste management plan (WMP) that includes common, hazardous, infectious and special (hospital) waste; v) community relations plan (CRP); vi) close-out and decommissioning plan (CDP); and vii) monitoring and review plan (MRP) Environmental Management Plan (EMP) for the construction phase.	<ol style="list-style-type: none"> <li>1. Environmental Management Plan (EMP) for the construction phase</li> <li>2. EMP for the operation phase</li> </ol>	<ol style="list-style-type: none"> <li>1. 30 days prior to the start of the construction phase</li> <li>2. 60 days before completion of construction</li> </ol>
1.6	Submit evidence of having held CEP coordination and disclosure meetings with authorities, local representatives and the community.	Records and minutes of meetings	Prior to consideration by the Board of Directors
1.7	Submit a list of sources for the materials and landfills to be used, with their respective operating permits.	List of sources of materials and dumps	30 days prior to the start of the construction phase
1.8	Implement a system for measuring and monitoring the implementation of the ESMS and the management plans for the construction and operation phases that contain key indicators for such monitoring, including: i) the key risks and impacts of the Project on employees, communities and the natural environment; ii) compliance with laws and regulations, and iii) progress in the implementation of the management programs.	<ol style="list-style-type: none"> <li>1. System to measure and monitor the implementation of the ESMS and the management plans for the construction phase</li> <li>2. System to measure and monitor the implementation of the ESMS and the management plans for the operation phase</li> </ol>	<ol style="list-style-type: none"> <li>1. 30 days prior to the start of the construction phase</li> <li>2. 60 days before completion of construction</li> </ol>
1.9	Submit a report on the implementation of the Cumulative Impact Mitigation Plan.	Report on the implementation of the Cumulative Impact Mitigation Plan	As part of the regular environmental and social compliance reports
1.10	Submit a monitoring matrix for the training of environmental and social personnel.	Matrix for monitoring the training of environmental and social personnel	As part of the regular environmental and social compliance reports

No.	Action	Final Product/Deliverable	Expected Completion Date
1.11	Submit regular reports on the execution of the ESMP for the Project construction and operation phases.	Regular monitoring reports	As part of the regular environmental and social compliance reports
1.12	Submit and adopt an internal and external mechanism for Petitions, Grievances, Complaints and Requests (PGCR) for the operation phase that includes: i) a procedure for recording and responding to grievances, with deadlines, allocation of responsibilities, and a resolution process ; ii) methods for submitting a grievance and/or requests for information; iii) management of grievances; iv) methods for filing a grievance or request for information; v) indicators to measure the effectiveness of the grievance resolution process; vi) procedures to collect anonymous grievances, and v) procedures in the event of grievances received through contractors or subcontractors.	1. Internal and external PGCR mechanism for the operation and maintenance phases	1. 60 days prior to completion of construction
<b>PS 2: Labor and Working Conditions</b>			
2.1	Develop and implement an Occupational Health and Safety (OHS) program for the construction and operation phases that includes: i) a policy that defines OHS ii) a risk prevention training program for workers consistent with to their classification and functions; iii) a contractors' manual that contains the basic legal requirements and defines the standards to be followed by personnel in terms of behavior, health, safety, environment, and social coexistence; and iv) a Code of Conduct. Document shall be included in the contract documents of contractors and subcontractors.	1. OHS for the construction phase 2. OHS for the operation phase 3. Occupational Health and Safety training programs for the construction and operation phases 4. Contract documents	1. 30 days prior to the start of the construction phase 2. 60 days prior to completion of construction 3. 60 days prior to completion of construction 4. Before the first disbursement
2.2	Prepare and implement the occupational health and safety requirements applicable to contractors and subcontractors during the construction phase. Include these in the contractual provisions to ensure compliance.	Occupational health and safety requirements applicable to contractors and subcontractors during the construction phase	60 days prior to the start of the construction phase
2.3	Develop and implement a worker employment plan for the construction and operation phases.	1. Worker employment program for the construction phase 2. Worker employment program for the operation and maintenance phase	1. 30 days prior to the start of the construction phase 2. 60 days before completion of construction
<b>PS 3: Resource Efficiency and Pollution Prevention</b>			
3.1	Prepare and implement a Resource Efficiency Plan that identifies objectives and goals for the conservation of raw materials, water and energy, and to minimize waste generation.	1. Resource Efficiency Plan that includes: i) Water and Energy, for the construction phase 2. Resource Efficiency Plan that includes: i) Water and Energy, for the operation phase	1. Prior to the first disbursement. 2. 60 days before completion of construction
<b>PS 4: Community Health, Safety and Security</b>			
4.1	Conduct a community consultation and disclosure process regarding the Project.	1. Evidence of having conducted at least one consultation process 2. Evidence of the completion of the consultation process during the construction and operation phases of the Project	1. Prior to consideration by the Board of Directors 2. Prior to Project submission to the Board of Directors 3. Together with the regular environmental and social compliance reports
<b>PS 8: Cultural Heritage</b>			

No.	Action	Final Product/Deliverable	Expected Completion Date
8.1	Prepare a chance-find protocol.	1. Protocols for actions in the event of chance finds	1. Prior to the first disbursement

### C. Contact Information

For project inquiries, including environmental and social questions related to an IDB Invest transaction please contact the client (see Investment Summary tab), or IDB Invest through the email [divulgacionpublica@iadb.org](mailto:divulgacionpublica@iadb.org). As a last resort, affected communities have access to the IDB Invest Independent Consultation and Investigation Mechanism by writing to [mecanismo@iadb.org](mailto:mecanismo@iadb.org) or [MICI@iadb.org](mailto:MICI@iadb.org), or calling +1(202) 623-3952.