

# **Suzano Imperatriz Pulp Mill Project, Brazil**

## **1. Background**

### **1.1. The project**

The Suzano Imperatriz Pulp Mill in Brazil is a greenfield project for the construction of an industrial complex to produce bleached eucalyptus pulp in the southwest area of the state of Maranhão, near the city of Imperatriz. The unit will have an installed capacity of 1.5 million tons per year of eucalyptus market pulp and the start-up is scheduled for the 4th quarter of 2013. In addition to the pulp mill site itself, the project includes plantations, infrastructure development, logistics and shipping.

### **1.2. Purpose of this document**

The Suzano Imperatriz Pulp Mill is classified as a category A-project. During the development phase, a large number of reports have been produced, which describe the Environmental and Social impacts and mitigation strategies of the project, totalling more than 6000 pages. A majority of the material is in Portuguese. The purpose of this document is to summarize the status of the project from an environmental and social point of view.

## **2. EIAs performed according to Brazilian legislation**

### **1.3. Brazilian environmental licencing process**

In Brazil, an Environmental Impact Assessment (EIA) is required during the environmental licensing process of new projects or expansion projects. The Federal CONAMA Resolution 01/86 requires that an EIA must be prepared by developers for new projects or expansions of projects listed in its Article 2, which includes pulp and paper production facilities, railways, ports, pipelines, high voltage transmission lines above 230 kV and energy power plants above 10 MW, among others. However, this list is only indicative, allowing State or Municipal agencies to require an EIA for other planned industries or enlargement of existing ones.

An EIA and its non-technical report RIMA (Relatório de Impacto Ambiental) must be developed, submitted to the environmental protection agency and to a public hearing, reviewed and approved before the issuance of an Environmental Preliminary Permit.

A number of EIAs and RIMAs have been finalised in Portuguese during the development phase of Suzano Imperatriz Pulp Mill project for the Pulp & Paper mill, Railway Access, Access Road, Transmission Line 230kV and plantations in the state of Tocantins and Maranhão.

### **2.2 Brazilian EIAs vs. Internationally required ESIA's**

The EIA required by Brazilian legislation differs from ESIA's (Environmental and Social Impact Assessment) applied by international financial institutions since it does not consider international legislation, guidelines or best practices within the sector of the project, including IFC Performance Standards. In addition, Brazilian EIA:s do not consider occupational health and safety, labour and working conditions, land acquisition and other aspects of the IFC Performance Standards. Consequently the environmental agencies follow basically the standards and environmental threshold

limits (i.e. air emissions, wastewater discharge, among others) established by municipality, state or the union in order to approve or issue the permits. In general, Brazilian environmental threshold limits are less stringent than those of the IFC Performance Standards and IFC EHS Guidelines.

### **2.3 Benchmarking against International Standard**

Given the differences in Brazilian legislation and International Standard in early 2012, the international parties involved in the project asked for an external evaluation of the project, prepared by independent consultants. The purpose was to get a full overview of how the project fulfils international standard, i.e. the IFC Performance Standards. The evaluations were performed through an assessment of deviations against international requirements and were based on all relevant background documentation, site visits and a review of licenses and other permits.

The result of altogether three different consultancy assignments were a gap analysis and an action plan which specifies how the remaining gaps shall be met by Suzano with focus on how the project fulfils local and international conditions IFC Performance Standards. The Action Plan defines objectives, responsibilities, activities, timeline and results for the implementation.

The final version of the Action Plan dated 21 December 2012 is available on the Finnvera's webpage.

### **3.3 Documentation available at Finnvera upon request**

In addition to the Gap Analysis and Action Plan following documents can be obtained from Finnvera upon request:

1. Pöyry. 2010. Estudo de impacto ambiental – EIA Industrial,
2. Pöyry. 2011. Estudo de impacto ambiental – EIA/RIMA ramal ferroviário.
3. Forestry Operations:
  - a. Relatório de Impacto Ambiental: Projecto de Silvicultura do Tocantins.
  - b. STCP Engenharia de Projetos LTDA. 2010. Relatório de impacto ambiental – RIMA da área de implantação do projeto florestal da Suzano, na região de Porto Franco, estado do Maranhão.
4. DTA Engenharia. 2012. Construção de Armazém de Pellets e Celulose no Porto do Itaqui. PCA/RCA Porto.
5. Pöyry. 2011. Estudo ambiental simplificado linha de transmissão de energia elétrica 230kV.
6. ERM. 2012. Environmental and Social Gap Assessment of Maranhão Project - Suzano Papel e Celulose.