



8 Updated Action Plan




The Concessionaire has given a solution to almost all the actions requested in the previous Action Plan. It is important to clarify that some of the measures do not correspond to an ongoing non-compliance IFC Standards and Equator Principles III but are in the process of being implemented or are still pending implementation. The Action Plan has been updated up to August 2019.



The status of the actions is shown in Table 13 and has been evaluated with the following color coding.



 Solved  On Track  Pending  New Action



Table 13 Action Plan Monitoring – Pacifico 2.




No	Proposed Action	IFC PS	Proposed Deadline	Current Status (Updated August 2019)	Color code
1	<p>Environmental License – Minor changes and Modifications</p> <p>The Concessionaire shall inform the Independent Engineer the status of all the Minor Changes and license modifications presented to the ANLA.</p> <p>UF: UF1.2, UF3 and UF4.</p>	PS1	Next Quarterly Environmental and Social Report	<p>Considering that according to the Concession Contract, the completion of UF 4 is scheduled for October 10th, 2020 and that the construction activities of the Marvalle bridge must start in November 2019, Arup identifies a possible risk to the compliance of the completion date of UF4.</p> <p>Arup requests the Concessionaire to report all the measurements that are going to be implemented to mitigate this risk, specifying which will be the action plan until February 2020, considering the impossibility to use the industrial roadway, modifying the slopes and dispose materials in the required zodmes</p> <p>This action remains On Track.</p>	
2	<p>PQRS System: The Concessionaire shall report the status of the PQRS that are pending for full closure from the</p>	PS5	Every environmental and social monitoring	<p>Between June and August 2019, the Concessionaire received 27 new PQRS and responded to 24 of them. At</p>	

	<p>previous monitoring reports and the current evaluated period. UF: All</p>		<p>report until all PQRS are fully closed.</p>	<p>the end of the reported period 3 PQRS remain open. These are within the times established by law and its closure will be reported in the next E&S report. The Concessionaire must continue informing the Independent Engineer about the new PQRS and the status of the PQRS pending for full closure. Therefore, this action remains On Track.</p>	
3	<p>Compensation Plan. The Concessionaire has several compensation obligations arising from the environmental license, the forestry use permits, the Cauca River Nature Reserve subtraction, and the lifting of a ban on endangered species. This compensation has different due dates, timelines, processes, and obligations (see Section 6.2 – PS6). Therefore, the Concessionaire shall inform in every monitoring period the progress in its compensation obligations. UF: All</p>	PS6	<p>Next Quarterly Environmental and Social Report</p>	<p>During the evaluated period Arup evidenced advances in the processes carried out with the environmental authorities for the approval of the performed activities and the proposed Compensation Plans.</p> <p>Arup evidenced the Concessionaire is within the time frames established by the Environmental Authorities to meet the obligations of environmental compensations but requires the Concessionaire to continue reporting the performed activities in the next quarterly report.</p> <p>Therefore, this action remains On Track.</p>	
4	<p>Environmental permits – Water discharge permit CCO: The Concessionaire is pending to obtain the wastewater discharge permit for the Operation Control Centre (CCO). Arup clarifies that this permit is needed only for the operation of the CCO, which is planned to commence in 2020. The Concessionaire shall submit the permit application in the first semester of 2019. UF: CCO</p>	PS3	<p>Next Quarterly Environmental and Social Report</p>	<p>The Concessionaire is in process to obtain the wastewater discharge permit for the CCO. Arup clarifies that this permit is needed only for the operation of the CCO, which is planned to commence in 2020. The Concessionaire started with the permit procedure in August 2019. Therefore, it is expected to obtain the approval on November 2019.</p> <p>This action remains On Track.</p>	
5	<p>Socioeconomic Compensations: Arup request the Concessionaire to submit a detailed report about the progress in the social compensation</p>	PS5	<p>Next Quarterly Environmental and Social Report</p>	<p>The Concessionaire identified up to date 44 social units, 19 properties, 33 families, and 105 people in UF1.2, and five (5) in UF2.</p>	

<p>activities in UF 1.2 and UF 2 in the next quarterly monitoring.</p> <p>UF: UF 1 and UF 2</p>		<p>During this period, ANI and the municipality of Tamesis solved the lack of legal support of 18 properties in La Bocana sector in UF 1.2 and recognized the social compensations factors for these properties.</p> <p>The Concessionaire is on track to finish the socio-economic compensation of various social units. This Performance Standard is marked as on-track until the property acquisition status reaches an end.</p>
<p>6</p> <p>Environmental Punitive Action: During the monitoring period, ANLA issued the beginning of an environmental punitive action (Auto N° 06507 October 24, 2018) related to the following facts: (i) The construction of a box culvert in the Marvalle waterbody (near Bolombolo) with different characteristics (type, dimensions and location) than those approved in the Environmental License of UF 4. (ii) The alignment of an Industrial roadway not authorized in the Environmental License (K38+000 UF 4). And (iii) Not informing ANLA about the minor change of the Industrial roadway alignment in K 38+000 UF 4, prior performing construction activities.</p> <p>Arup identifies a risk on the procedure that might be followed up with the environmental authorities, before any new intervention. Arup will continue monitoring the environmental punitive action process in the next quarterly report.</p> <p>UF: 4</p>	<p>PS1</p> <p>Next Quarterly Environmental and Social Report</p>	<p>During the evaluated period the ANLA response remains pending.</p> <p>Arup will continue tracking this process and its implication in the development of the Project.</p> 
<p>7</p> <p>Environmental Monitoring: The Independent Engineer request the Concessionaire to submit the analysis of the results of all the monitoring campaigns (air, noise, water</p>	<p>PS 3</p> <p>Next Quarterly Environmental and Social Report</p>	<p>Arup does not identify risks related to environmental monitoring results. According to the results from the last air quality monitoring campaign for UF 1.2 – bypass and UF 1.1 – 2, Arup evidence the</p> 

<p>flows and quality) in order to evaluate the compliance with national regulations, the IFC performance standards and the fulfillment of the monitoring schedules according to the environmental license and PAGA’s timeframes.</p> <p>UF: All.</p>		<p>Concessionaire is complying with the national an IFC maximum permissible levels.</p> <p>Arup will continue evaluating the results of all the monitoring campaigns in compliance with the environmental monitoring schedules. Therefore, this action is marked as On Track.</p>
<p>Archaeological Management Plan</p> <p>Considering that the Archeological License no. 5556 of all the UFs was valid until March 1st, 2019, Arup requested the Concessionaire to inform about the implications of the procedure with the ICANH and how this affects the compliance of the archaeological management plan. Arup also request to implement all the necessary measurements to remedy this situation.</p> <p>In Arup’s opinion performing excavation and land removing activities without having the updated Archaeological License represent a risk to the administrative compliance of the project, which can represent a fine imposed by the ICANH.</p> <p>UF: All</p>	<p>PS 1, 8</p> <p>Next Quarterly Environmental and Social Report</p>	<p>The Concessionaire submitted the approval of the archaeological license addendum no. 11 which will allows the Concessionaire to continue developing the archaeological management measures approved in the management plan until March 1st, 2020.</p> <p>Therefore, this action is marked as Solved</p> 
<p>Water springs environmental, social and technical management</p> <p>In May 2019, during the excavation activities of the slopes in UF 2 K 33+100 to K33+760, some water springs with high flow rates were detected by the Concessionaire. This area corresponds to the influence area of the Project and the influence area of a hydroelectric project located upstream in the Mulatos River and the Q. La Llana. Arup request the</p>	<p>PS 6</p> <p>Next Quarterly Environmental and Social Report</p>	<p>The Concessionaire is carrying out geotechnical, hydrological, geo- electrical, detection of isotopes and on-site monitoring flows studies in order to identify the source of the water, which according to the Concessionaire could be related to the hydroelectrical adjacent project. The results of the studies are not yet available.</p> <p>According to the Concessionaire the presence of the water springs does not affect the development of the</p> 

	<p>Concessionaire to submit the results of the studies and all the (i) technical, (ii) environmental and (iii) social measurements that should be implemented to mitigate all the possible impacts.</p>			<p>activities in this area, however Arup recommends taking all the preventive measures in order to prevent water pollution and conserve and protect groundwater resources.</p> <p>Arup will continue evaluating the study's results and their consequences on the works activities. Therefore, this action is marked as On Track.</p>	
<p>10</p>	<p>Fauna management measures</p> <p>During the site visit Arup evidenced the efforts of the Concessionaire for protecting fauna through the implementation of fauna passages in 10 different sites along the Project. Even though, due to the raining season of the region, some passages were affected. The Concessionaire continues monitoring their effectiveness, and results will be evaluated in the next quarterly.</p>	<p>PS 6</p>	<p>Next Quarterly Environmental and Social Report</p>	<p>The Concessionaire hired the Metropolitan Technological Institute for the design of all the fauna passages of the project. According to the study 14 different passages will be installed along the project including ground and elevated types. The study is planned to be submitted to the environmental authorities in September 2019.</p> <p>Arup will continue evaluating the procedures with the environmental authorities and their implementation and effectiveness. Therefore, this action is marked as On Track.</p>	
<p>11</p>	<p>Land acquisition process – Peña Bonita</p> <p>Arup request the Concessionaire to inform about the process carried out in the property “Peña Bonita” in which some measurements related to the connectivity and protection of a productive project are required to be implemented as part of the land acquisition process of 1 kilometer of UF 2.</p>	<p>PS 5</p>	<p>Next Quarterly Environmental and Social Report</p>	<p>During the site visit it was evidenced that the Concessionaire carried out an outstanding social support to the property acquisition process and adjust the road design, including some infrastructures, that guarantee the continuity of the productive project carried out for several years in this property.</p> <p>Therefore, this action is marked as “Solved”.</p>	

<p>12</p>	<p>Water treatment – Cartama</p> <p>During the site visit, Arup evidenced high water flows and sediments that seems to exceed the water treatment capacity in the Argos Cement plant located in Cartama. Although any major risks were identified, Arup request the Concessionaire to evaluate and submit the capacity data of this water treatment plant and sludge drying system and inform in the next monitoring period if additional measurements are required to guarantee their efficiency.</p> <p>UF: 4</p>	<p>PS 3</p>	<p>Next Quarterly Environmental and Social Report</p>	<p>New Action</p>	
<p>13</p>	<p>Dangerous substances storage</p> <p>In compliance with the environmental management plan of the project, Arup recommend the Concessionaire to install all the ceilings required in the areas of dangerous substances storage, like the emulsion storage in ready – mix concrete plant of Cartama.</p> <p>UF: 2</p>	<p>PS 3</p>	<p>Next Quarterly Environmental and Social Report</p>	<p>New Action</p>	
<p>14</p>	<p>Working conditions – work force layoff:</p> <p>Due to the end of construction works some of the UFs, Arup request the Concessionaire to report all the programs, activities, statistics and effectiveness of the implemented measurements regarding the work force layoff protection.</p> <p>UF: All</p>	<p>PS 2</p>	<p>Next Quarterly Environmental and Social Report</p>	<p>New Action</p>	

9 Photographic Record



Archaeology management plan



Epiphytes study and proliferations



CCO – Woks activities



Water treatment capacity in the Argos Cement plant located in Cartama UF 4



Ceilings required in the areas of dangerous substances storage



Water springs in UF 2 K 33+100 to K33+760



Water course protections measurements



Fauna monitoring



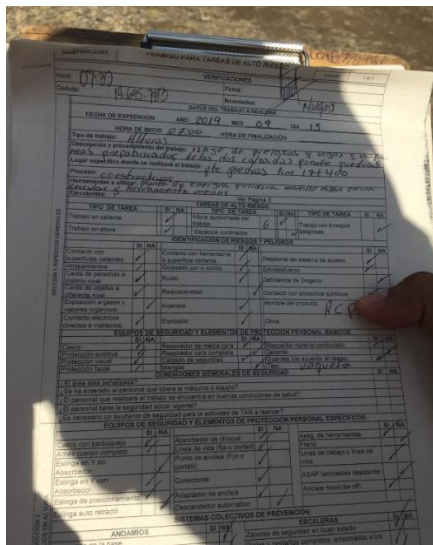
Finished excavation activities in Mulato Tunnel



Peña Bonita Property – Works activities for protecting the productive project



Forestry use activities



H&S programs: on site verification of the procedures