






9 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 2020. The status of the actions is shown in Table 10 and has been evaluated with the following color coding.




 Solved  on Track  Pending  New Action




Table 10 Action Plan Monitoring – Pacifico 2.



No	Proposed Action	IFC PS	Proposed Deadline	Status (Updated August 2020)	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>In June 5, 2020, ANLA approved the environmental license modification no. 6 of UF 4 and the Owner, through an EER grants a 90-day time extension until January 8, 2021 for UF4. During the evaluated period no environmental licenses modification was required. Reported minor changes corresponded to increasing areas and volumes for excavation materials in ZODMES.</p> <p>This action remains on Track for evaluating further environmental licenses’ minor changes and/or modifications.</p>	
2	<p>PQRS System: The Concessionaire shall report the status of the PQRS that are pending for full closure from the previous monitoring reports and the current evaluated period.</p> <p>UF: All</p>	PS5	-	Arup finds the Concessionaire continue to comply with PQRS system and response. This action is marked as Solved.	

<p>3 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 7 – PS6). Therefore, the Concessionaire shall inform in every monitoring period the progress in its compensation obligations.</p> <p>UF: All</p>	<p>PS6</p>	<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>To date, 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, with a special emphasis in the Natural Subtraction Compensation Plan and the Biodiversity Compensation Plans pending of approval. Therefore, this action remains On Track.</p>	
<p>4 Socioeconomic Compensations: Arup request the Concessionaire to submit a detailed report about the progress in the social compensation activities in UF 1.2 and UF 2 in the next quarterly monitoring.</p> <p>UF: UF 1 and UF 2</p>	<p>PS5</p>	<p>Next Quarterly Environmental and Social Report</p>	<p>The Concessionaire is on track to finish the socio-economic compensation of several social units. This Performance Standard is marked as on-track until the property acquisition status reaches an end. See PS5 for updated information about the progress.</p>	
<p>5 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>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>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>6</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 flows and quality) 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>PS 3</p> <p>Next Quarterly Environmental and Social Report</p>	<p>Arup does not identify risks related to environmental monitoring results. The Concessionaire has provided updated water, air and noise monitoring results. No breaches of results are worth to mention.</p> <p>Arup will continue evaluating the results of all the monitoring campaigns in compliance with the environmental monitoring schedules. However, for the evaluated period this action is marked as Solved.</p> 
<p>7</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 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>UF: All</p>	<p>PS 6</p> <p>Next Quarterly Environmental and Social Report</p>	<p>The Concessionaire submitted the results of the geotechnical, hydrological, geo- electrical, detection of isotopes and on-site monitoring flows studies, which concluded that the source of the water could be related to the hydroelectrical adjacent project. The study was submitted to Corantioquia, and its evaluation is in process.</p> <p>According to the Concessionaire the presence of the water springs does not affect the development of the activities in this area, however Arup recommends keeping taking the measures to prevent water pollution protect groundwater resources and slopes.</p> <p>Since further investigation is needed, this aspect remains on track.</p> 

8	<p>Fauna management measures</p> <p>During the previous 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>UF: All</p>	PS 6	Next Quarterly Environmental and Social Report	<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 designs have been approved by ANLA for 14 passages, being 6 still pending.</p> <p>Arup will continue evaluating the procedures with the environmental authorities and their implementation and effectiveness. During the evaluated period, most of fauna passages were impacted by rainy seasons. Therefore, this action is marked as On Track.</p>	
9	<p>Working conditions – Retrenchment Plan:</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>	PS 2	Next Quarterly Environmental and Social Report	<p>Through the nine programs of the contractual Social Management Plan, the Concessionaire is aiming to reinforce the training of the communities located in the influence area of the Project, to engage with productive projects and to apply for new vacancies for the Operation and Maintenance stage of the Project.</p> <p>Arup request the Concessionaire to submit some statistics and effectiveness of the implemented measurements regarding the work force layoff protection. This action remains “On Track”.</p>	
10	<p>Protection against COVID19:</p> <p>Arup request the Concessionaire to submit in the next monthly report information about the results of the implemented measures according to the government and national authorities, how the outbreak has affected the Project and its environment and which programs are being included in the project in compliance with IFC PS 1, 2 and 4.</p>	PS 2 PS 4	Next Quarterly Environmental and Social Report	<p>Arup finds that the Concessionaire has taken appropriate measures in response to the COVID-19 outbreak, all of which have been in accordance with the instructions and standards of the relevant authorities. To date, the Concessionaire has reported: (i) 136 suspected cases, (ii) 38 positive cases (form EPC and the Concessionaire) (iii) 35 recovered and back to work. Three (3) active cases are isolated and monitored.</p>	

				This action remains “On Track”.	
	UF: All				
11	<p>Environmental files closure: Considering that Works in UF2 and UF3 are planned to be completed by the end of September 2020, Arup request the Concessionaire to report the progress on the environmental closure and the schedule for complying with the Supervisor and the environmental authorities’ requirements.</p> <p>UF: All</p>	PS 1	Next E&S monitoring report	Following Appendix 6 of the Concession Contract, the Concessionaire must demonstrate to the Supervisor and ANI that it has complied with all the obligations established in PAGAs, the Environmental License, and the environmental permits. If any non-compliance is identified, the Concessionaire has 180 days from the signing of the UF's Completion of Works Certificate to remedy it. Arup checked the status of the permits and files related to the environmental closure of UFs 2 and 3, and 4 there are not major pending environmental aspects. This action remains “On Track”.	
12	<p>Working conditions: The Concessionaire must specify the working conditions (work hours, wages, workers per work front, rest and food areas, transport, etc.) for the UFs where working conditions will be adjusted for night works as part of the preventive measures of Covid 19 outbreak.</p> <p>UF: All</p>	PS 1 PS 2	Next E&S monitoring report	The information of working conditions for night hours was shared by the Concessionaire. Arup finds the comply with the health and safety national specifications and fulfill the IFC performance standards. Arup will continue evaluating this aspects. However, for the evaluated period this action is marked as Solved.	
13	<p>Disposal of excavation materials: Considering that ANLA and Corantioquia did not approve the requested Zodmes for UF 4. Arup requests the Concessionaire to report the updated available volume in the already authorized Zodmes compared with the mass balance of the pending construction activities. Also, the measures taken to guarantee the availability of excavations material disposal.</p> <p>UF: 4</p>	PS 1 PS 3	Next E&S monitoring report	The Concessionaire needs to increase the disposal capacity of excavated materials in UF4 by approximately 526,000m ³ . According to the last mass balance submitted by the Concessionaire in August 2020, Arup finds the current disposal capacity will allow the Concessionaire to continue to carry out the works. Since the Project has a contingency in Marvalle	

bridge that may require earthworks, this aspect remains on Track.					
14	<p>Contingencies in Marvalle and Libano Bridge: The Concessionaire must report in the next monitoring report all actions implemented to overcome the contingencies occurred in September 2020. Including, but not limited to, the following:</p> <ul style="list-style-type: none"> • Estimation of technical, economic, social and environmental impacts. • Planned areas for the disposal of materials (is necessary) • Communications with national authorities. • Estimated time to overcome the contingency. • Environmental and social management measures implemented. • Necessary environmental and socioeconomic compensations. <p>UF: 2 and 4</p>	PS 1 PS 3	Next E&S monitoring report	New Action	
15	<p>Health and Safety: While the project complies with the severity and frequency indices, a significant increase in the number of accidents and the severity index reported by the EPC was observed in the last quarter. Arup requests the Concessionaire to support the reasons for the increase in the severity indicator and the measures implemented to reduce it, including an action plan and lessons learned.</p> <p>UF: All</p>	PS 1 PS 2	Next E&S monitoring report	New Action	

10 Photographic Record



Watercourse protection – La Batea



WWTP Tunnel Mulatos



El Rocio - ZODME



Nursery - Environmental Compensations



Planting activities - Environmental
Compensations



Contingency in UF 4
Source: Concessionaire, 2020



Contingency in UF 2
Source: Concessionaire, 2020



Road safety programs



Flow monitoring in Tunnel Mulatos



Adequate working conditions



Landscaping in OCC



Slopes stabilizations in UF 2

Appendix 1. Minor Changes of the Environmental Licenses

Table 11: EIA / PAGA resolutions and modifications (August 2020)

UF	Environmental License/PAGA	Modifications
1	Approved by document No. 01-018-0503-15. December 01, 2015	<ul style="list-style-type: none"> PAGA version 6. Approved in May 28, 2018.
1.2	Approved Environmental License. Resolution No. 0300. March 22, 2016.	<ul style="list-style-type: none"> None
2	Approved by document No. 01-018-0145-15.	<ul style="list-style-type: none"> PAGA version 5. Approved in May 28, 2018.
3	Approved Environmental License. Resolution No. 0249 March 10, 2016	<ul style="list-style-type: none"> Resolution No. 0532. May 16, 2017
4	Approved Environmental License. Resolution No. 0115. February 5, 2016	<ul style="list-style-type: none"> No. 1. Resolution No. 01436. November 26, 2016 No. 2. Resolution No. 0517. May 5, 2017 No. 3. Resolution No. 01005. July 4, 2018 No. 4. Resolution No. 01070. June 14, 2019 No. 5 Resolution 02093. October 21, 2019 – Marvalle bridge design changes No. 6 Resolution 01022 of June 5, 2020–Industrial roadways, Ondulado bridge changes and slopes Marvalle bridge
5	Approved by document No. 01-018-00347-15.	<ul style="list-style-type: none"> None

Table 12 Minor Changes (August 2020)

UF	Minor change	ANLA's response
UF 1.2	No. 1. Change in the construction of drainage works (August 3, 2017, November 23, 2017 and February 19, 2018)	<ul style="list-style-type: none"> ANLA agreed a (March 22, 2018).
	No. 2. Profit of excavation materials of La Variante by the company ICEIN S.A. (December 18, 2017)	<ul style="list-style-type: none"> ANLA agreed (February 5, 2018)
	No.3 Material donation to the Caucana farm located in PR 2+600 (La Pintada – Primavera) from some landslides in UF 1.2	<ul style="list-style-type: none"> ANLA agreed (July 24, 2019)
	No.4 Material donation to the Cartama PIT in PR 3+300 (La Pintada – Peñalisa) due to the landslides in UF 1.2 (April 30, 2019)	<ul style="list-style-type: none"> <u>Process in evaluation by ANLA</u>
UF 3	No. 1. Relocation and adjustment of the access road to the Tunnel Entrance Portal (September 14, 2016)	<ul style="list-style-type: none"> Not responded. The response is not needed.
	No. 2. Modifying the level of the Mulatos Tunnel entrance portal (June 12, 2017)	<ul style="list-style-type: none"> ANLA agreed (July 21, 2017)
	No. 3. Changing the industrial wastewater treatment system, and relocating the wastewater discharge point in the same water stream (August 09, 2017)	<ul style="list-style-type: none"> ANLA agreed (October 06, 2017)
	No. 4. Processing excavated material at CONYTRAC and the relocation of the supporting infrastructure at the exit portal of the tunnel (October 26, 2017)	<ul style="list-style-type: none"> ANLA agreed (December 7, 2017)
	No. 5 Change in the water discharge location in the Cauca river related to the exit of Mulatos Tunnel (November 10, 2017)	<ul style="list-style-type: none"> ANLA agreed (December 28, 2017)

	<p>No. 6 Addition of a new industrial supportive area in the entrance Portal of Mulatos Tunnel (October 28, 2018)</p>	<ul style="list-style-type: none"> • ANLA denied the request (May 6, 2019). • Nevertheless, due to the end of the excavation activities of the Tunnel, the Concessionaire will not require the additional area anymore, therefore, this does not represent risks on the Project construction.
	<p>No. 7 Implementation of new infrastructures for drying sewage sludge from the WWTP in ZODME 8 (km 32+100) (December 7, 2018)</p>	<ul style="list-style-type: none"> • Considering that the ZODME is in the area where PAGA applies, the request must be directed to CORANTIOQUIA. • Due to the location of ZODME 8, ANLA confirmed this request cannot be considered as a minor change according to the article 2.2.2.6.1.1 of the Decree 1076, 2015. • Considering the end of the excavation activities of the Tunnel, the Concessionaire will not require the additional area anymore, therefore, this does not represent risks on the Project construction.
	<p>No. 8. Use of the ZODME 8A to dispose of excavation material not suitable for structural fillings and other construction activities, coming from the entire Highway 2 Pacific Connection Project (Marvalle Bridge – UF4)</p>	<ul style="list-style-type: none"> • <u>In approval process by ANLA</u>
UF 4	<p>No.1. Relocation and adjustment of the access road to the Kilometer 38+490 (March 28, 2017)</p>	<ul style="list-style-type: none"> • ANLA agreed (July 17, 2017)
	<p>No. 2. Changing the industrial wastewater system for the material exploitation area <i>PIT</i> (August 03, 2017)</p>	<ul style="list-style-type: none"> • ANLA agreed (November 24, 2017)
	<p>No. 3. Changing the dimensions of a Box Culvert and installing a concrete production plant (August 18, 2017)</p>	<ul style="list-style-type: none"> • ANLA agreed with the change in the dimensions of the Box Culvert (October 3, 2017).
	<p>No 4. Use of an existent unused railway to access construction areas of the Cauca Bridge (October 11, 2017 and December 6, 2017)</p>	<ul style="list-style-type: none"> • ANLA approved the use of an existent unused railway to access construction area as a minor change (March 9, 2018)
	<p>No 5. Modification in construction activities and adjustments to the dimensions of piles of the Cauca Bridge (October 20, 2017)</p>	<ul style="list-style-type: none"> • ANLA agreed (November 23, 2017)
	<p>No. 6. Change in the PIT's industrial water treatment system and relocation of the discharge point (February 23, 2018)</p>	<ul style="list-style-type: none"> • ANLA agreed (July 23, 2018)
	<p>No. 7. Box Culvert construction km 37+ 280 and change in the box culvert hydraulic section km37 + 460 (May 3, 2018)</p>	<ul style="list-style-type: none"> • ANLA agreed (November 21, 2018).
	<p>No. 8. Change in the construction process for the Mechanically Stabilized Wall (May 25, 2018)</p>	<ul style="list-style-type: none"> • ANLA agreed (September 21, 2018).

No. 9. Addition of a new industrial supportive area for piles 4 and 6 of the Cauca Bridge (December 17 th , 2018)	<ul style="list-style-type: none"> ANLA denied the request, April 22, 2019.
No. 10. Addition of a new industrial supportive area for piles 6 of the Cauca Bridge (July 9, 2019)	<ul style="list-style-type: none"> ANLA agreed (August 12, 2019).
No. 11. Addition of an industrial roadway (August 13 th , 2019)	<ul style="list-style-type: none"> ANLA agreed (November 19, 2019).
No. 12. Road design adjustment in Marvalle sector (November 5, 2019)	<ul style="list-style-type: none"> Response is not required
No. 13. Box culvert construction at Km 37+473 as cattle step (November 25, 2019)	<ul style="list-style-type: none"> Response is not required
No. 14 Increase of PIT Cartama's volume (December 24, 2019)	<ul style="list-style-type: none"> Response is not required
No. 15. Capacity increase of Zodme 12 (March 25, 2020)	<ul style="list-style-type: none"> Response is not required
No. 16. Authorization for cattle passage (May 22, 2020)	<ul style="list-style-type: none"> Response is not required
No. 17. Authorization for disposing materials in different areas with environmental permits (May 22, 2020)	<ul style="list-style-type: none"> ANLA's response in pending

Appendix 2. ICAs follow - up

Table 13. ICAs submission follow - up

UF	ICA No.	Reported Period	Last Issued Date
1	1	November 2016 – May 2017	October 12, 2017
	2	May 2016 – November 2017	September 5, 2018
	3	November 2017 – May 2018	October 16, 2018
	4	May 2018 – November 2018	May 2, 2019
	5	November 2018 – May 2019	January 23, 2020
	6	May 2019 – November 2019	March 2, 2020
3	1	February 2017 – July 2017	April 25, 2018
	2	August 2017 – January 2018	October 12, 2018
	3	February 2018 – July 2018 (*)	April 11, 2019
	4	August 2018 – January 2019	August 29, 2019
	5	February 2019 – June 2019	February 6, 2020
	6	July 2019 – December 2019	May 6, 2020
4	1	March 2017 – August 2017	May 25, 2018
	2	August 2017 – February 2018	October 17, 2018
	3	March 2018 – August 2018	April 1, 2019
	4	August 2018 – February 2019	June 4, 2019

5	March 2019 – June 2019	February 6, 2020
6	July – December 2019	May 13, 2020

Appendix 3. UF 4 Zodmes Follow- Up

ZODME	Approved Volume (m ³)	Requested Volume (m ³)	Arranged Volume (m ³)	Available Volume (m ³)	Comments
10 - Res. 115	261,065	-	261,065		
10 - Res. 1005	Ext. Volumen +125,605 <u>386,670</u>	-	47,136	0	Closed
11 - Res. 115	100,580	-	100,580		
11 - Res. 1005	Ext. Volumen +104,700 <u>205,300</u>	-	95,584	9,136	Zodme 11
12 - Res. 115	222,040	-	221,320		
12 - C. Menor	-	42,300	-	43,020	Minor Change to increase volume in 42.300 m3.
11 A - Sol. MLA-UF4	-	45,367	-	-	Not approved by ANLA
SAN RAFAEL - Sol. MLA-UF4	-	104,933	-	-	Not approved by Corantioquia
15 A - Sec. Planeación Venecia	-	131,994	-	131,994	Minor Change based on No. 1 Art. 2.2.2.6.1.2 del Decree 1076 de 2015.
El Balsal/El Rocío	-	442,891	50,485	392,406	Minor Change based on No. 1 Art. 2.2.2.6.1.2 del Decree 1076 de 2015.