

## 7 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 November 2018.



The current status of the actions are shown in Table 12 and has been evaluated with the following color coding.









Table 12 Action Plan Monitoring – Pacifico 2.


No	Proposed Action	IFC Performance Standard	Proposed Deadline	Current Status (Updated November 2018)	Color code
1	<p><b>Environmental: CO<sub>2</sub> Emissions.</b> The Concessionaire should quantify the CO<sub>2</sub> equivalent emission of the project activities as stated by PS3 for projects with emissions above 25,000 tons of CO<sub>2</sub> equivalent per year. The first theoretical quantification should be estimated before the beginning of construction, and it should be annually updated during the whole life of the Project.</p> <p><b>UF:</b> All</p>	PS3	January 2019	<p>On track</p> <p>The Concessionaire provided a GHG emissions forecasting for 2017, 2018, 2019 and 2020. The results are based on gasoline and diesel projected consumption. Arup opines that the GHG emissions forecasting is reasonable. However, Arup recommended the Concessionaire to recalculate GHG emissions at the end of each year based on real fuel consumption (this was already made for years 2015, 2016 and 2017). The Concessionaire reported they</p>	<span style="color: orange;">■</span>




				will calculate and present GHG support for 2018 in the first semester of 2019. This action remains on track.	
2	<p><b>Environmental permits – Water discharge permit CCO:</b> 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.  <b>UF:</b> CCO</p>	PS3	First semester of 2019	<p>On track</p> <p>The Concessionaire shall submit the permit application in the first half of 2019. This action remains on track.</p>	
3	<p><b>PQRS System:</b> The Concessionaire shall report the status of the PQRS that are pending for full closure from the previous monitoring reports and the all PQRS made in the period of the current report.  <b>UF:</b> All</p>	PS5	Every environmental and social monitoring report until all PQRS are fully closed.	<p>On track</p> <p>Between September and November 2018, the Concessionaire received 41 new PQRS and responded to 26 of them. At the end of the reported period 15 PQRS remain open. These are within the times established by law. The Concessionaire shall 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>	
4	<p><b>Compensation Plan.</b> 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</p>	PS6	Next Quarterly Environmental and Social Report	<p>On Track</p> <p>The Concessionaire submitted ANLA’s approval of the Compensation Plans of the Biodiversity Compensation in UF 1 and UF 2 and has developed different activities considering forestry use compensation activities for UF 1,2 and UF 2 and the lifting of ban on endangered species obligations. Even</p>	


	<p>in every monitoring period the progress in its compensation obligations. <b>UF: All</b></p>			<p>though some Compensation Plans approval are under environmental authorities' evaluation and the Cauca River Nature Reserve subtraction compensations have not begun. 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 report the performed activities in the next quarterly report.</p> <p>Therefore, this action remains on track.</p>	
<p><b>5</b></p>	<p><b>Environmental license – Minor changes</b> The Concessionaire informed the status of the minor changes presented to the ANLA. Based on this information the Concessionaire shall inform the Independent Engineer the status of all the Minor Changes of the Environmental License.  <b>UF: UF1.2, UF3 and UF4.</b></p>	<p>N/A</p>	<p>Next Quarterly Environmental and Social Report</p>	<p>The Concessionaire has reported to the ANLA seventeen Minor Changes. Arup revised the reasons of this changes and opines that they comply with the Decree 1076 of 2015. ANLA has approved (15) requests, minor change No.6 of UF 3 and minor change No. 8 of UF 4 are in review process. The Concessionaire shall inform the Independent Engineer the status of the minor changes where the ANLA has not yet responded. Therefore, this action remains on track.</p>	
<p><b>6</b></p>	<p><b>Socioeconomic Compensations in UF 1.2 and UF 2.</b> The Concessionaire should have a plan or portfolio to be in compliance with Performance Standard 5.  <b>UF: 1.2 , 2</b></p>	<p>PS5</p>	<p>Next Quarterly Environmental and Social Report</p>	<p>The Concessionaire reports the socioeconomic compensation factor for UF 1,2 and UF 2. This action will remain on track until the property acquisition and the socioeconomic compensation activities are concluded.</p>	

7	<p><b>ICA:</b> Submit to the Independent Engineer the Environmental Compliance Report of UF1.2 pending to be filed in ANLA.</p> <p><b>UF:</b> 1.2</p>	PS3	Immediate	<p>In October 2018 the Concessionaire submitted the ICA report. Therefore, this action is marked as Solved.</p>	
8	<p><b>Health and Safety:</b></p> <p>Arup request the Concessionaire to reinforce HSE training, mainly in work in heights due to some workers were working without lifelines in the Asphalt Plant.</p> <p><b>UF:</b> All</p>	PS4	Immediate	<p>During the evaluated period, Arup evidenced good practices of workers due to work in heights in the Asphalt Plant and the Concessionaire report HSE training reinforce activities. Therefore, this action is marked as “solved”.</p>	
9	<p><b>Fatal incidents – HSE:</b> Submit to the independent engineer the developing and final results of the two (2) fatal incidents happened during this period. All legal obligations should be guaranteed.</p> <p><b>UF:</b> All</p>	PS4	Immediate	<p>During the evaluated period the Concessionaire submitted the activities and legal procedures carried out regarding the fatal incidents of the last monitoring period, thus this action is marked as solved.</p>	
10	<p><b>Property acquisition - Stripped land:</b> The Concessionaire obtained in 2015, the certificate from the Land Restitution Unit that states that there is not stripped land in the Project’s area. However, this register is continually being updated. Therefore, Arup urges the Concessionaire to request the certification of stripped land to the Land Restitution Unit every three months to be presented in each</p>	PS5	Next Quarterly Environmental and Social Report	<p>Pending</p> <p>Up to date Concessionaire has submitted a certification from May 31, 2018, in the last monitoring report, Arup requested the Concessionaire an updated LRU certification. The information has not been submitted. Therefore, this action is marked as Pending. This action is pending.</p>	

	<p>environmental and social monitoring report until the property acquisition process finishes.</p> <p><b>UF: All</b></p>					
<p><b>11</b></p>	<p><b>Environmental: Water affection in the tunnel.</b>                  The Concessionaire should monitor the water sources established in the baseline for the tunnel area (UF3) every six months until the completion date and annually until the end of the contract agreement, to avoid any reduction of underground water levels. Also, it should have strict compliance with the proposed Monitoring Plan for surface and underground water.</p> <p>During the past site visit of Arup, evidenced high levels of turbidity and color in the wastewater discharge authorized in UF 3. Arup request the Concessionaire to report the analysis of the monitoring results of this point and to define if additional water treatment measurements are required to comply with the parameters of the wastewater discharge permit and the IFC standards.</p> <p><b>UF: UF3</b></p>	<p>PS6</p>	<p>Next                  Quarterly                  Environmental                  and Social                  Report</p>	<p>Pending</p>	<p>The Concessionaire presented the water monitoring reports for the tunnel area. The physic-chemical, microbiological and hydro biological characterization of surface water and ground water levels., but the results analysis are pending.</p>	
<p><b>12</b></p>	<p><b>Environmental Punitive Action:</b> During the monitoring period, ANLA issued the beginning of an environmental punitive action (Auto N° 06507</p>	<p>N/A</p>	<p>Next                  Quarterly                  Environmental</p>		<p>New Action</p>	

	<p>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><b>UF: 4</b></p>	<p>and Social                  Report</p>	
<p><b>13</b></p>	<p><b>Water Consumption:</b> The Concessionaire provided the information of water consumption for September and October 2018, Results for November is pending. Arup request the Concessionaire to provide the consolidated information related to water consumption compared to the authorized flow for each UF and for the specific monitored period in the next quarterly reports.</p>	<p>PS 3</p> <p>Next                  Quarterly                  Environmental                  and Social                  Report</p>	<p>New Action</p> 

UF: All.					
14	<p><b>Environmental Monitoring:</b> The Independent Engineer request the Concessionaire to submit the analysis of the results of all the monitoring campaigns (air, noise, water flows and quality) in a way that the independent engineer can 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>	PS 3	Next Quarterly Environmental and Social Report	New Action	
15	<p><b>Wastes Management:</b> During the site visit, Arup evidenced in the Doraditas Bridge some wastes not properly separated, storage and protected. Arup request the Concessionaire to implement the corrective measurements in order to handle wastes properly and protect the near waterbody and report activities in the next monitoring period</p> <p>UF: All</p>	PS 3	Next Quarterly Environmental and Social Report	New Action	
16	<p><b>Material Disposal ZODMES -</b> During the site visit Arup evidenced temporal excavation material storage in the weighting areas in UF 1 and the Doraditas bridge. Considering the available volume in the authorized ZODMES Arup request the Concessionaire to avoid disposing material in different areas and to report</p>	PS 3	Next Quarterly Environmental and Social Report	New Action	

	<p>in the next quarterly monitoring if new disposal areas are required.</p> <p><b>UF:</b> All</p>				
<p><b>17</b></p>	<p><b>Forestry Use:</b> For this monitoring period the Concessionaire only reported the end of forestry use activities in UF 1.2. Arup request the Concessionaire to provide the complete information, including forestry use activities in all UFs, in order to evaluate the environmental management of the evaluated period</p> <p><b>UF:</b> All</p>	<p>PS 5</p>	<p>Next Quarterly Environmental and Social Report</p>	<p>New Action</p>	



## 8 Photographic Record

### Photographic Record December 5 and 6, 2018



Punitive Action Box Culvert Area, no damages or risks identified



Punitive Action Industrial Roadway Area, no damages or risks identified



Properly Health and Safety activities



Adequate control spill infrastructures



Color and Turbidity in wastewater discharge (tunnel UF3)



Inadequate storage of wastes and excavation material

**Photographic Record December 5 and 6, 2018**



Finished water occupations in UF 1



UF 1 Compensation Activities



Epiphytes Nursery



Non-vascular epiphytes compensation investigation



PIT activities



Social Activities UF 1 construction activities closing