

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 February 2021. 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 February 2021)	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	During the evaluated period no environmental licenses modifications or minor changes were requested. This action remains on track for evaluating further environmental licenses’ minor changes and/or modifications.	
2	<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 7 – PS6). Therefore, the Concessionaire shall inform in every monitoring period the progress in its compensation obligations.</p> <p>UF: All</p>	PS6	Next Quarterly Environmental and Social Report	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. 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. Arup notes that the Natural Subtraction Compensation Plan and the Biodiversity Compensation Plans are still pending approval. Therefore, this action remains On Track.	

<p>3</p>	<p>Socioeconomic Compensations: Arup requests the Concessionaire submit a detailed report about the progress in the social compensation activities in UF1.2 and UF2 in the next quarterly monitoring, including the number of social units and budget per UF.</p> <p>UF: UF1 and UF2</p>	<p>PS5</p>	<p>Next Quarterly Environmental and Social Report</p>	<p>The Concessionaire submitted information regarding the last social units pending. They reported 100% of agreement with the affected communities but have not concluded with the payment schedule (budget yet to be submitted). Arup considers the Concessionaire is on track to finish the socio-economic compensation of several social units. This Performance Standard is still marked as on track until the property acquisition status and socioeconomic compensation plan reach an end. See PS5 for updated information about the progress.</p>	
<p>4</p>	<p>Environmental Punitive Action: In October 2018, ANLA issued the beginning of an environmental punitive action in UF4. 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’s response remains pending. Arup will continue tracking this process.</p>	
<p>5</p>	<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. The Concessionaire continues monitoring their effectiveness, and results will be evaluated in the next quarterly 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 20 different passages will be installed along the project including ground and</p>	<p>PS 6</p>	<p>Next Quarterly Environmental and Social Report</p>	<p>During the evaluation period, the Concessionaire received approval for the designs of three elevated wildlife crossings. Three are still pending, while the other crossing structures are still under construction. The Concessionaire expects the work to be completed by the end of March 2021. 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>elevated types. The designs have been approved by ANLA for 14 passages, being 6 still pending.</p> <p>UF: All</p>			
<p>6</p>	<p>Protection against COVID-19:</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> <p>UF: All</p>	<p>PS 2 PS 4</p>	<p>Next Quarterly Environmental and Social Report</p>	<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 77 positive cases (from the EPC and the Concessionaire), all of them recovered and back to work. This action remains “On Track”.</p> 
<p>7</p>	<p>Environmental files closure: Considering the end of works in UF2 and UF3. 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>	<p>PS 1</p>	<p>Next E&S monitoring report</p>	<p>According to the Completion of Works Certificates, for UF2 and UF3 (dated March 30, 2021) the Concessionaire must close some pending aspects related to (i) communication of the end of works with nearby communities, (ii) three remaining PQRS which are related to complementary works in UF2, and (iii) 142 social files “<i>Actas de vecindad</i>” of UF2 and UF3. The Concessionaire has two months to submit the Environmental Closure report to the Supervisor, including the certificates of Zodmes, the removal of the excavation materials temporarily placed on the old road of UF2., and a checklist of the compliance of UF3’s environmental license obligations. This action remains “On Track”.</p> 

<p>8</p>	<p>Contingencies in Marvalle Bridge: The Concessionaire must report in the next monitoring report all actions implemented to overcome the contingencies occurred in September 2020.</p> <p>UF: 2 and 4</p>	<p>PS 1 PS 3</p>	<p>Next E&S monitoring report</p>	<p>To date, the Concessionaire has complied with eight contingency reports, and the environmental authority has not requested further actions or information. This action remains “On Track” until the submission of the final report of the contingency.</p>	
<p>9</p>	<p>GHE emissions, Air quality and noise monitoring: The concessionaire had stipulated air quality monitoring for December 14, 2020. However, the results have not yet been reported.</p>	<p>PS 3</p>	<p>Next E&S monitoring report</p>	<p>To date, the Concessionaire has complied with air quality, noise and emissions standards. However, in the current period, the monitoring report stipulated for December 2020 was not submitted. This action remains “On Track” until the submission of the monitoring report.</p>	
<p>10</p>	<p>Occupational accidents: In the previous period, the Concessionaire recorded 20 occupational accidents, which demonstrates that adequate prevention measures are being taken. However, the statistics for this period were not reported.</p>	<p>PS 2</p>	<p>Next E&S monitoring report</p>	<p>For the following period, the Concessionaire is requested to adequately update the statistics of occupational accidents in order to continue with good reporting practices. This action is marked as "On track" until the update is received.</p>	