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



Table 10 Action Plan Monitoring – Pacífico 2.

No	Proposed Action	IFC PS	Proposed Deadline	Status (Updated November 2020)	Color code
1	Environmental License – Minor changes and Modifications The Concessionaire shall inform the Independent Engineer the status of all the Minor Changes and license modifications presented to the ANLA. UF: UF1.2, UF3 and UF4.	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	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.		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, with a special emphasis in the Natural Subtraction Compensation Plan and the Biodiversity Compensation	

	UF: All			Plans pending of approval. Therefore, this action remains On Track.
3	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. Including the number of social units and budget per UF. UF: UF 1 and UF 2	PS5	Next Quarterly Environmental and Social Report	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 and socioeconomic compensation plan reaches an end. See PS5 for updated information about the progress.
4	Environmental Punitive Action: In October 2018, ANLA issued the beginning of an environmental punitive action in UF 4. 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. UF: 4	PS1	Next Quarterly Environmental and Social Report	During the evaluated period the ANLA's response remains pending. Arup will continue tracking this process.
5	Groundwater flow: In May 2019, during the excavation activities of the slopes in UF 2 K 33+100 to K33+760, a groundwater flow was 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.	PS 6	-	During the site visit, Arup evidenced that the Concessionaire implemented measures to prevent water pollution and to protect groundwater resources and slopes. Arup will continue evaluating this aspect, however for the evaluated period this action is marked as solved.

	UF: All				
6	Fauna management measures 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. 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.	PS 6	Next Quarterly Environmental and Social Report	During the evaluated period, the Concessionaire started with ground fauna passages and is adjusting the design of the elevated ones. The ground passages are planned to be concluded between February and 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.	
7	Working conditions – Retrenchment Plan: 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. UF: All	PS 2	-	The Retrenchment Plan is being implemented. It includes a search of local companies interested in hiring, support for resume draft and interview preparation, and monitoring of the process. Arup will continue evaluating this aspect, however for the evaluated period this action is marked as solved.	
8	Protection against COVID-19: Arup request the Concessionaire to submit in the next monthly report information about the results of the implemented measures according to the government and	PS 2 PS 4	Next Quarterly Environmental and Social Report	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) 175	

	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. UF: All			suspected cases, (ii) 59 positive cases (from EPC and the Concessionaire) (iii) 52 recovered and back to work. The seven (7) active cases are isolated and monitored. Arup will continue to evaluate this aspect. Section 8.3 shows COVID-19 traceability. This action remains "On Track".
9	Environmental files closure: Considering that Works in UF2 and UF3 are planned to be completed during 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. UF: All	PS 1	Next E&S monitoring report	During the evaluated period, Arup checked the status of the permits and files related to the environmental closure of UFs 2 and 3, there are not major pending environmental aspects. Arup request the Concessionaire to continue to report the progress on the environmental closures. This action remains "On Track".
10	Disposal of excavation materials: ANLA and Corantioquia did not approve the requested Zodmes for UF 4, and the Concessionaire needs to increase the disposal capacity of excavated materials in UF4 by approximately 526,000m3. 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. UF: 4	PS 1 PS 3	-	According to the last mass balance submitted by the Concessionaire in November 2020, Arup finds the current disposal capacity (including ZODME El Balzal) will allow the Concessionaire to continue to carry out the works, including the earthworks related to the contingency in Marvalle bridge. This aspect is marked as solved.

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11	 Contingencies in Marvalle 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: 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. 	PS 1 PS 3	Next E&S monitoring report	During the evaluated period, the Libano Bridge contingency was controlled, and the final report of the contingency was presented to the environmental authorities. Regarding the landslide that occurred near Marvalle Bridge, Arup was able to assess the situation during our site visit and determined that the landslide did not impacted the infrastructure. Furthermore, the Concessionaire could stabilize the area without delaying further the works in the UF. The Concessionaire continues reporting the mitigation measures to the environmental authorities. This action remains "On Track".	
12	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. UF: All	PS 1 PS 2	-	The Concessionaire submitted the requested information corresponding to a serious incident in which a worker closed an inspection box causing the loss of a phalange that occurred in the past quarter. The SST protocol was compiled including sharing the lessons learned with the project's staff. This aspect is marked as solved.	

10 Photographic Record



Meeting with "Becarios del Cartama" – Scholarships as part of the Social Management Plan



Activities and recyclabe campaigns for the nursery fundraising and environmental awareness



Contingency recovery activities and Marvalle Bridge works



Contingency recovery activities – Puente Libano



Installation of bird seed collection devices. Biodiversity compensation UF 1.2.



Road safety activities, including PAC 1, PAC 2 and MAR 1 Concession Projects



Slopes stabilization and groundwater drainage in $K33-UF\ 2$



Recovered area in the minor landslide near PAC 3 connection

Appendix 1. Minor Changes of the Environmental Licenses

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

UF	Environmental License/PAGA	Modifications
1	Approved by document No. 01-018-0503-15. December 01, 2015	 PAGA version 6. Approved in May 28,2018.
1.2	Approved Environmental License. Resolution No. 0300. March 22, 2016.	• None
2	Approved by document No. 01-018-0145-15.	 PAGA version 5. Approved in May 28,2018.
3	Approved Environmental License. Resolution No. 0249 March 10, 2016	• Resolution No. 0532. May 16, 2017
4	Approved Environmental License. Resolution No. 0115. February 5, 2016	 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.	• None

 Table 12 Minor Changes (November 2020)

UF	Minor change		ANLA's response
	No. 1. Change in the construction of drainage works (August 3, 2017, November 23, 2017 and February 19, 2018)	•	ANLA agreed a (March 22, 2018).
UF 1.2	No. 2. Profit of excavation materials of La Variante by the company ICEIN S.A. (December 18, 2017)		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	•	ANLA agreed (July 24, 2019)

UF	Minor change	ANLA's response
	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)	Process in evaluation by ANLA
	No. 5 Modification of areas selected for environmental compensations (forestry use), May 2020.	Process in evaluation by ANLA
	No. 1. Relocation and adjustment of the access road to the Tunnel Entrance Portal (September 14, 2016) No. 2. Modifying the level of the Mulatos Tunnel	Not responded. The response is not needed.
	entrance portal (June 12, 2017)	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)	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)	• 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)	• ANLA agreed (December 28, 2017)
		• ANLA denied the request (May 6, 2019).
	No. 6 Addition of a new industrial supportive area in the entrance Portal of Mulatos Tunnel (October 28, 2018)	 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.
UF 3	No. 7 Implementation of new infrastructures for drying sewage sludge from the WWTP in ZODME 8 (km 32+100) (December 7, 2018)	 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.
	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)	Response is not required
	No. 9 Drainage minor adjustment in Tunnel Mulatos	Response is not required
	No 10. Increase of authorized volumes of ZODME 8A	Response is not required
UF 4	No.1. Relocation and adjustment of the access road to the Kilometer 38+490 (March 28, 2017)	ANLA agreed (July 17, 2017)

UF	Minor change	ANLA's response
	No. 2. Changing the industrial wastewater system for the material exploitation area <i>PIT</i> (August 03, 2017)	• ANLA agreed (November 24, 2017)
	No. 3. Changing the dimensions of a Box Culvert and installing a concrete production plant (August 18, 2017)	• ANLA agreed with the change in the dimensions of the Box Culvert (October 3, 2017).
	No 4. Use of an existent unused railway to access construction areas of the Cauca Bridge (October 11, 2017 and December 6, 2017)	 ANLA approved the use of an existent unused railway to access construction area as a minor change (March 9, 2018)
	No 5. Modification in construction activities and adjustments to the dimensions of piles of the Cauca Bridge (October 20, 2017)	• ANLA agreed (November 23, 2017)
	No. 6. Change in the PIT's industrial water treatment system and relocation of the discharge point (February 23, 2018)	ANLA agreed (July 23, 2018)
	No. 7. Box Culvert construction km 37+ 280 and change in the box culvert hydraulic section km37 + 460 (May 3, 2018)	• ANLA agreed (November 21, 2018).
	No. 8. Change in the construction process for the Mechanically Stabilized Wall (May 25, 2018)	• 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)	• 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)	ANLA agreed (August 12, 2019).
	No. 11. Addition of an industrial roadway (August 13 th , 2019)	• ANLA agreed (November 19, 2019).
	No. 12. Road design adjustment in Marvalle sector (November 5, 2019)	Response is not required
	No. 13. Box culvert construction at Km 37+473 as cattle step (November 25, 2019)	Response is not required
	No. 14 Increase of PIT Cartama's volume (December 24,2019)	Response is not required
	No 15. Capacity increase of Zodme 12 (March 25,2020)	Response is not required
	No 16. Authorization for cattle passage (May 22, 2020)	Response is not required
	No 17. Authorization for disposing materials in different areas with environmental permits (May 22, 2020)	Response is not required
	No 18. Authorization for disposing materials in different areas with environmental permits (August 13, 2020)	Response is not required

Appendix 2. ICAs follow - up

Table 13. ICAs submission follow - up

UF	ICA No.	Reported Period	Last Issued Date	
	1	November 2016 – May 2017	October 12, 2017	
	2 May 2016 – November 201		September 5, 2018	
	3 November 2017 – May 2018		October 16, 2018	
1	4	May 2018 – November 2018	May 2, 2019	
	5	November 2018 – May 2019	January 23, 2020	
	6	May 2019 – December 2019	March 2, 2020	
	7	January – June 2020	October 12, 2020	
	1 February 2017 – July 2017		April 25, 2018	
	2 August 2017 – January 2018		October 12, 2018	
3	3 February 2018 – July 2018 (*)		April 11, 2019	
J	4 August 2018 – January 2019		August 29, 2019	
	5	February 2019 – June 2019	February 6, 2020	
	6	July 2019 – December 2019	May 6, 2020	
	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	4	August 2018 – February 2019	June 4, 2019	
	5	March 2019 – June 2019	February 6, 2020	
	6	July – December 2019	May 13, 2020	
	7	January – June 2020	December 1, 2020	

Appendix 3. UF 4 Zodmes Follow- Up

During the evaluated period, the Concessionaire estimated a volume of 129,378 m³ related to pending works in UF 4 (K 37 +900 and K 39+200). According the available volumes in approved ZODMES (646,369m³) Arup does not identify major risks related to excavation materials disposal.

Table 14. Zodmes volumes follow – up

ZODME	Approved Volume (m³)	Requested Volume (m³)	Arranged Volume (m³)	Available Volume (m³)	Comments
10 - Res. 115	261,065	-	261,065		
10 - Res. 1005	Ext. Volumen +125,605 386,670	-	47,136	0	Closed
11 - Res. 115	100,580	-	100,580		
11 - Res. 1005	Ext. Volumen +104,700 205,300	-	95,584	9,136	Zodme 11
12 - Res. 115	222,040	-	221,320	43,020	

ZODME	Approved Volume (m³)	Requested Volume (m ³)	Arranged Volume (m³)	Available Volume (m³)	Comments
12 - C. Menor	-	42,300	-		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 Balzal/El Rocío	442,891	442,891	165,796	277,095	Minor Change based on No. 1 Art. 2.2.2.6.1.2 del Decree 1076 de 2015.
Cofre de Oro	185,124	185,124	0	185,124	

Appendix 4. Environmental Compensations

 Table 15. Environmental Compensations Status

Туре	UF	Resolution	Area or number of trees	Status
	UF5	Res No.160AS-1602-9820	10	Finished
	UF1	Res No. 160CA-1602-10174 and Res. 160CA-ADM1807-3511	300	In Process Monitoring phase
	UF1Y2	Res No. 160CA-1606-10312	100,94 has	In Process Planting phase
	UF2	Res No.160CA-RES1711-6321	3	Finished
	UF1Y2Y5	Res No. 160CA-RES1708-4566	231	Finished
	UF1y2	Res No. 160CA-RES1702-736	26,5 has	In Process Planting phase
	UF1y2	Res No. 160CA-RES1710-6013	9525	Pending Not approved yet
Forestry Use	UF1	Res No. 160CA-RES1806-3598	105	Pending Withdrawal of the permit
USE	UF1	Res No. 160CA-1803-1257	510	In Process Monitoring phase
	UF5	Res No. 160CA RES1810-5715	117	In Process Monitoring phase
	UF2	Res No. 160CA-RES1802-431	625	In Process Monitoring phase
	UF2	Res No. 160CA-RES1812-7137	516	In Process Monitoring phase
	UF2	Res No. 160CA-RES1907-3469	7	Finished
	UF5	Res No. 160CA-RES1907-3464	7	Finished
	UF2	Res No. 160CA-RES1903-1655	265	In Process Monitoring phase
	UF2	Res No. 160CA-RES1910-5382	99	Pending

Туре	UF	Resolution	Area or number of trees	Status
				Withdrawal of the permit
	UF2	Res No. 160CA-RES2004-1904 y Res No. 160CA-COI2004-6917	168	Pending Selecting areas
	UF2	Res No. 160CA-COI2007-14782	259	Pending Selecting areas
	UF2	Res No. 160CA- RES2007-4374	1723	Pending Selecting areas
	UF 1.2	RES No. 0300	7,38 has	In Process Planting phase
	UF 3	RES No. 0249	14,96 has	In Process Bidding phase
Biodiversity	UF 4	RES No. 1436	14753/21,56 has	Pending Not approved yet
Loss	UF 4	RES No. 1005	1671/5,18has	Pending Not approved yet
	UF 4	RES No. 2093	15,94/5087	In Process Bidding phase
	UF 4	RES No. 1022	7221/13,05	In Process Bidding phase
National	UF 1.2, 1.1, 2, 3 y 4	Res No. 2217-14oct-2015	1798/3 has	In Process Monitoring phase
Lifting of Ban	UF 1 y 2	Res No. 0330-5mar-2018	2780/5 has	Pending Not approved yet
	UF 4	Res No. 1510-30sep-2019	625/1 has	Pending Not approved yet
Regional	UF 1.2, 1.1, 2, 3 y 4	Res No.040-1602-21875	1370	In Process Monitoring phase
Lifting of Ban	UF 1 y 2	Res No. 040-1810-5545	19726	Pending Not approved yet
	UF 4	Res No. 040-1909-4634	198	Pending Not approved yet
	UF 1.2, 1.1, 2, 3 y 4	Agreement 473	1161.1	In Process Bidding phase
Nature Reserve	UF 1.2, 1.1, 2, 3 y 4	Agreement 532 modification of 473	1408.25	In Process Bidding phase
Subtraction	UF 1, 3 y 4	Agreement 538	352.6	In Process Bidding phase
	UF4	Agreement 580	43.48	In Process Bidding phase
	UF1	Res No. 160 CA-RES1901-36	150	In Process Monitoring phase
PAGA sections	UF1	Res No. 160 CA-RES1811-6193	250	In Process Monitoring phase
	UF1	Res No. 160 CA-RES1811-6183	250	In Process Monitoring phase
	UF2	Res No. 160 CA-RES1906-2867	110	In Process Monitoring phase
	UF1	Res. 160CA-ADM2008-3784	420	In Process Monitoring phase
	UF2	Res No. 160 CA-RES1610-10480	150	Pending Selecting areas

Туре	UF	Resolution	Area or number of trees	Status
	UF2	Res No. 160 CA-RES1610-10482	150	Pending Selecting areas