

7.4 Compliance with Supervision Monitoring

The Concessionaire is complying with the Supervision observations. Between July and December 2018, the Supervision graded each Functional Unit according to its performance. From the results, it can be interpreted that the Concessionaire is having an adequate environmental and social management. The lowest grade is 85% for UF2 and the highest rate is 96% for UF4 and UF5.

Table 9 Compliance with Supervision monitoring

%	July	August	September	October	November	Decemeber	Average
UF 1	96	96	96	67	97	97	92
UF 2	86	86	85	85	85	85	85
UF 3.1	97	97	95	96	97	89	95
UF 3.2	90	90	89	89	93	90	90
UF 4	95	96	97	97	96	97	96
UF5	97	96	97	97	95	96	96



7.5 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 December 2018.



To date, the Action Plan has seventeen (17) activities. Three (3) of them correspond to “on track” activities, four (4) are solved, one (1) is pending and nine (9) are new actions proposed after the site visit and the document review. The current status of the activities are shown in Table 10 and has been evaluated with the following color coding.





 Solved
  On Track
  Pending
  New Action


Table 10 Action Plan Monitoring




No.	Proposed Action (As set in the ESDD or previous Action Plan)	Proposed Deadline	Current Status (Updated December 2018)	Color code
1	<p>Risk of fall at Tesalia Tunnel : The channel to conduct the water from inside the tunnel to the its entrance, is not well signaled and does not have any protection barrier. This could represent a risk of fall for employees and machinery.</p> <p>Consecutively, Arup request he installation of a protection barrier to the reduce the risk of fall.</p> <p>Furthermore, during the evaluated period 3 accidents were reported in Tesalia Tunnel’s gallery portal, the Concessionaire manage the events according to the approved procedures, even though Arup request the Concessionaire to implement all the preventive measurements in order to prevent more accidents related to the Patia fault.</p> <p>UF: 2.2 PS4</p>	Immediately	As seen in the past monitoring period the Concessionaire has not installed a protection barrier to reduce the risk of fall at the industrial wastewater treatment plant in Tesalia Tunnel. This action is still marked as Pending.	
2	<p>Property Acquisition- Compensation mechanisms: The system for social compensations offered by the Project to the communities located along the road in UF 2, 3 and 4 being defined. But up to date none of the 311 properties in UF 5 have been relocated, due to the presence of strong social organizations of truck washing and lodging services, traders, restaurant and artisanal miners, with whom the conciliation process has been difficult.</p> <p>During the reported period Arup evidenced the Concessionaire is working on evaluating all the different alternatives for relocating these social units. But have not defined the specific strategy for the social compensation of these units.</p>	Biannual – Next Envi. And social report.	<p>Because of the impossibility to continue property acquisition in UF5 the Concessionaire is preparing an event of liability extension (EER) which will be submitted to ANI in the next monitored period. Arup will follow up the EER and the programs and measures the Concessionaire defines to implement with these social units.</p> <p>Arup request the concessionaire to report in the next period the strategy and measurements that will be implemented as well as the estimation of the impact of this situation in the construction schedule.</p>	



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3	<p>UF: 5 PS/EP:PS5</p> <p>Archaeology: According to the results obtained during the archeological field studies phase, which determined that the Project area has an archeological potential qualified as medium-high, and estimated the probability of archeological findings, the area is considered to have a risk of significant findings.</p> <p>In Arup’s opinion, the Concessionaire is making efforts in advance with the archeological rescues and is having a responsible management of archeological findings.</p> <p>However, Arup evidence that the Concessionaire has not find all the required final places in which the rescued archeological material will be delivered. The Concessionaire should submit in the following period the selected places.</p> <p>Regarding Cafetales and the Petroglyph Arup request to be informed about the process and risk of delay in the construction activities.</p> <p>UF: All PS/EP:PS8</p>	<p>Biannual – Next Envi. And social report.</p>	<p>During the reported period the Concessionaire carried out archaeological monitoring activities in Zodmes, UF 2 and UF 5 and is implementing the preventive archaeological programs in UF 1, UF 3 an UF 4. Also developed laboratory activities and training activities about the importance of the archaeological heritage.</p> <p>The concessionaire has its own laboratory and is working on identifying a place to deliver all the archaeological findings, also is working on the characterization and management plan of the Petroglyph in UF 5 and Cafetales area in UF 3.2.</p>	
4	<p>Entrance portal of Irra Tunnel:</p> <p>Between November 2017 and January 2018, one segment of the entrance portal of the Irra Tunnel collapsed (K52+300) due to a translational landslide. Currently, the Concessionaire is working in the stabilization of this sector though the implementation of different mitigation and control measures. As requested in the last monitoring</p>	<p>Biannual – Next Envi. And social report.</p>	<p>The Concessionaire should inform Arup of any notification or visits of the environmental authorities, ANLA and Corpocaldas. In addition, it should present the reports or documents showing the final works in this sector and should install a life line until the stabilization activities reaches an end.</p>	


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	<p>period the Concessionaire is notifying the environmental authorities and Arup about the works performed in this area.</p> <p>During the site visit, it was evidenced that the Concessionaire is progressing with the stabilization measures and construction activities in the tunnel were resumed. Even though Arup evidence that a lifeline is needed to be installed in order to prevent the risk of fall due to the high slopes.</p> <p>UF4 PS4</p>			
5	<p>Hydraulic Works near Cauca Bridge (K40+900): The hydraulic works performed at K40+900 did not have adequate water course protection barriers representing a possible risk of pollution of the stream. In addition, there were construction waste around the area which could also end in the stream.</p> <p>UF4 PS4</p>	Immediately	<p>During the last site visit Arup evidenced that the Concessionaire installed protection barriers and is likely managing wastes near the water course.</p> <p>Arup will continue monitoring the protection barriers of all the hydraulic works of the project. The action near Cauca Bridge in marked as Solved.</p>	
6	<p>Cauca Bridge facilities: A group of employees were performing woodworks without all the necessary PPE. We requested the Job hazard analysis (JHA) for this activity. However, the employees did not have certainty of the type of gloves they have to use. Arup recommends reinforcing training, re-develop the JHA and provide all necessary PPE.</p> <p>UF4 PS4</p>	Immediately	<p>During the site visit Arup evidenced a properly use of personal protection equipment in all work fronts and camps. The action is marked as solved.</p>	

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7	<p>ICA Reports: The concessionaire should send to the independent engineer the evidence of filing the pending ICA reports in ANLA.</p> <p>UF ALL PS NA</p>	Immediately	The Concessionaire submitted the evidence of the pending ICA reports. The action is marked as solved.	
8	<p>Supply Chain: In the last monitoring period there was no evidence about the source of material of the suppliers and their environmental and mining permits.</p> <p>UF: ALL PS/EP:PS6</p>	Biannual – Next Envi. And social report.	For the evaluated period the Concessionaire has submitted the updated lists of their suppliers with their environmental and mining certificates. Arup opines they comply with legal requirements. This item will be evaluated during all construction phase and is marked as solved.	
9	<p>Environmental Sanctioning Process: During the reporting period, the Concessionaire received the opening communication of an environmental sanctioning process (Auto no. 7540, November 30th, 2018), related to the construction of the Jaramillo's bridge piles in UF 1. Which is within the licensed area, but the construction activity was not authorized in the environmental license.</p> <p>The Concessionaire is reviewing the legal process and will report the advances and response issued to the environmental authority in the next monitoring report. Arup will follow up this process.</p> <p>UF 1 PS 1</p>	Biannual – Next Envi. And social report.	New Action	
10	<p>Industrial water management of Tesalia Tunnel:</p> <p>The Concessionaire has significantly improved the industrial wastewater treatment at the entrance and exit portal of Tesalia tunnel. Visually, it can be said that the treatment is efficient and is cleaning a</p>	Biannual – Next Envi. And social report.	New Action	

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	<p>high percent of the suspended solids. In addition, at the entrance portal, the Concessionaire has an inhouse laboratory, where they are performing daily me</p> <p>However, in the final water discharge in the entrance portal some suspended solids were detected. The Concessionaire is working on implementing an additional treatment for them. Arup will evaluate the effectiveness of removal of suspended solids in the next monitoring period.</p> <p>UF2 PS3</p>			
<p>11</p>	<p>Materials Disposal – ZODMES</p> <p>The concessionaire has identified 40 ZODMES, from which 14 are in use, 11 ready to use when necessary, 9 in closure process, 4 were desisted and 2 are in authorization process. Arup notices that ZODMES in use are meeting the technical specifications and designs approved by the environmental authorities and that are enough for the actual construction activities.</p> <p>Even though the concessionaire has the enough areas for the disposal of excavation materials, during the site visit Arup evidenced disposal of materials near the entrance of Irra Tunnel, camps in UF 3.2 and certain work fronts. Arup request the concessionaire to inform in the next monitoring report the reason why the excavation material is not being disposed in ZODMES. Furthermore, Arup request the concessionaire to inform the final disposal procedures that are being carried out with debris and material such as glass and wood from the demolished houses and infrastructures.</p>	<p>Biannual – Next Envi. And social report.</p>	<p>New Action</p>	

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	UF: All PS/EP:PS6			
12	Disclosure of information – PQRS System: Arup evidenced the Concessionaire has had an efficient management of the received PQRS. However, it is important to mention that there are recurrent PQRS related to high noise levels and dust near the work fronts areas. Arup will continue monitoring measures implemented by the concessionaire to prevent community affectation and additional PQRS related to air quality and noise. UF ALL PS 1 and 3	Biannual – Next Envi. And social report.	New Action	
13	Working Conditions: It is evidenced that the Concessionaire is hiring its employees according to legal requirements and has established procedures to ensure adequate working conditions. During the reported period, the number of hired employees is 2992, all employees have received induction training according to their functions, including the socio environmental training. Arup noticed that only 10% of the hired employees are women. Arup recommends the Concessionaire to evaluate and implement different programs to encourage recruitment of women from the region UF ALL PS 2 and 4	Biannual – Next Envi. And social report.	New Action	
14	Soil protection: The concessionaire has approved the management actions for the protection of soils, one of these measures is related to the protection measures in temporary camps, plants and facilities. During the site visit Arup evidenced that in camp some materials,	Biannual – Next Envi. And social report.	New Action	

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	<p>measure and control of oil spills, also measures for ensuring containers and machinery is being placed on the direct soil without any protecting the order al cleanliness is required.</p> <p>UF ALL PS 3</p>			
15	<p>Health and safety: During the site visit to the Irra Tunnel Arup evidenced no measurements applied for the air emissions and ventilation control inside the tunnel; high concentrations of dust, gases and humidity was perceived.</p> <p>Arup requires the concessionaire to install the ventilation system of the Tunnel in order to protect the workers' health and safety. Also, some gasoline vehicles were found near the Tunnel which can represent a risk related to gas emissions and the lack of the ventilation system.</p> <p>UF 4 PS 2</p>	<p>Biannual – Next Envi. And social report.</p>	<p>New Action</p>	
16	<p>Emergency and Contingency Plan: The concessionaire has, and adequate Contingency and Emergency Plan approved by the Environmental authorities in the Environmental Licenses and the supervisor of the project.</p> <p>Even though during the site visit Arup evidenced some corrective measurements that should be implemented: (i) define meeting points in an all the camps and tunnels area and disclosure it to every visitor of the project, (ii) improve the location and access to the anti-spill kits and fire extinguishers in all the facilities, (iii) define a standardize alarm system including all the contractor's camps and production plants, (iv) ensure that all the dikes are enough for preventing major spills (v)</p>	<p>Biannual – Next Envi. And social report.</p>	<p>New Action</p>	

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	<p>conduct drillings and (vi) control not only the entrance but the exit of visitors to the facilities of the project.</p> <p>Arup will evaluate the progress regarding this issue in the next monitoring period.</p> <p>UF All PS 1 and 2</p>			
17	<p>Organizational capacity and competence: The Concessionaire has a sound social and environmental work team for Project management. According to the information provided by the concessionaire approximately 62 people belong to the social, archaeological and environmental work team. Even though, during the site visit Arup evidenced that in the front works and component of UF 2.3 the active presence of an environmental resident is missing.</p> <p>UF 2.3 PS 1</p>	<p>Biannual – Next Envi. And social report.</p>	<p>New Action</p>	

8 Photographic Record



Figure 1. Disclosure of information and environmental campaigns



Figure 2. Community attendance offices



Figure 3. Runoff management structures in ZODMES.



Figure 4. Protection of water streams



Figure 5 Petroglyph finding in UF 5



Figure 6. Archaeological presence in excavation activities and material cover in trucks.



Figure 7. Debris and excavation material in different places than the authorized.



Figure 8 High slopes in Irra Tunnel, lifeline recommended.



Figure 9. Water stream protection measurements



Figure 10



Figure 11. WWTP without protection barrier in flocculant section in Tesalia exit portal.



Figure 12. Archaeology Laboratory



Figure 13. Wood, plastic and debris in ZODMES



Figure 14. Cleanliness order and soil protection required.

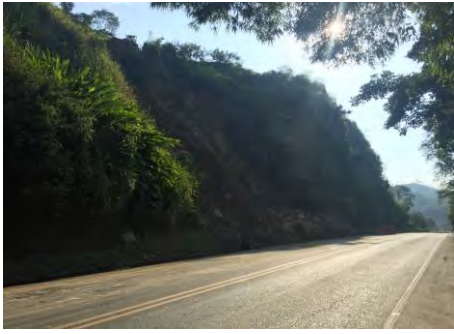


Figure 15. Construction works advance and proper traffic control.



Figure 16 Stabilization and hydraulic works.



Figure 17. Use of Protection Personal Equipment



Figure 18. Debris with no management.



Figure 19. Air control and WWTP in Tesalia exit portal.



Figure 20. Advance in construction activities Tesalia exit portal.



Figure 21. WWTP in Tesalia entrance portal.



Figure 22. Archaeological findings in Cafetales UF 3.2.