






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 May 2021. The status of the actions is shown in Table 9 and has been evaluated with the following color coding.




 Solved  on Track  Pending  New Action



Table 9 Action Plan Monitoring – Pacifico 2.

No	Proposed Action	IFC PS	Proposed Deadline	Status (Updated May 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 one minor change was requested to Corantioquia for the compensation plan of the subtraction of the Cauca River Nature Reserve. This action remains on track for evaluating the status of this minor change.	
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 is on track to finish the socio-economic compensation of several social units. This 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.</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>In May 2021, ANLA started other punitive action for noncompliance with the obligations established in the environmental license and other modifications regarding adjustments to the economic evolution of impacts. The Concessionaire will respond to ANLA. Arup will track this process in the following monitoring 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 for the first punitive action remains pending. The response of the Concessionaire for the second punitive action remains pending.</p> <p>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</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 and finished the construction of underpasses. Arup will continue evaluating the procedures with the environmental authorities and their</p>	

	<p>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 elevated types. The designs have been approved by ANLA for 14 passages, being 6 still pending.</p> <p>UF: All</p>		<p>implementation and effectiveness. Therefore, this action is marked as On Track.</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. Since the beginning of the Pandemic, the Concessionaire has reported 92 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>During the evaluated period, Arup reviewed the status of the permits and files related to the environmental closure of UFs 2 and 3, and the Completion of Works Certificates. The Concessionaire reached the environmental closure for UF 3 but UF2 remains pending. 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 16 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>	

11	<p>Archeological holders: Arup requested the Concessionaire to report the selected final holders of the archaeological material and the progress in the elaboration and approval of the final reports to ICAHN.</p>	PS8	<p>Next E&S monitoring report</p>	<p>The Concessionaire is finishing archeological laboratory activities and is working on the final report.</p>	
12	<p>Monitoring and evaluation of resettled social units: Due to COVID-19 the Concessionaire did not report the follow-up activities to the process of adaptation; however, is important to design methods and strategies that allow to measure the effectiveness of resettlement program.</p>	PS5	<p>Next E&S monitoring report</p>	<p>To date, the Concessionaire has been developing the land acquisition program, searching for houses and submitting the legal documents of the reestablished houses, however, is important to monitoring that the new standards of living are better or equal than previous.</p>	
13	<p>Mass balance for ZODMES: Arup request quarterly the mass balance of ZODMES to review the occupation of them.</p>	PS3	<p>Next E&S monitoring report</p>	<p>According to the last mass balance submitted by the Concessionaire in March 2021, Arup finds that the current disposal capacity of 343,720 m3 in Cofre de Oro and Rocio ZODMEs (plus ZODME El Balzal) will allow the Concessionaire to continue to carry out the remaining works, including the earthworks related to the contingency in Marvalle bridge.</p>	