







9. 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 August 2022. The status of the actions is shown in Table 11 and has been evaluated with the following color coding.






 Solved
  On Track
  Pending
  New action




Table 11. Action Plan Monitoring – Pacifico 2.

No	Proposed Action	IFC PS	Proposed Deadline	Status (Updated August 2022)	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 E&S monitoring Report	By means of communication 37-22-2022030700346 dated March 7, the Concessionaire requests the cease and file of the sanctioning process. On August 2, the authority made further requirements regarding the compensation plan. This action remains on track until Corantioquia's further announcement. No additional minor changes have been requested thus far.	
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 incidental take permits. These compensations have different due dates, timelines, processes, and obligations (see Section 6.6 – PS6). Therefore, the Concessionaire shall inform in every monitoring period the progress in its compensation obligations. UF: All	PS6	Next E&S monitoring Report	As of February 2022, the Concessionaire has achieved the closure of eight (8) resolutions regarding environmental compensation due to forestry use. Advances in the processes carried out with the environmental authorities for the approval of the performed activities have been evidence by Arup. Most of the compensation are already on track, while others are in bidding process. The compensation of Cauca River Nature Reserve Subtraction is pending for the execution; however, the plan has been adjusted by the Concessionaire considering Corantioquia's announcement. 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 progress of these offsets frequently. No considerable progress was reported on this period. This action remains On Track.	
3	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. UF: UF1 and UF2	PS5	Next E&S monitoring Report	The Concessionaire is on track to finish the socio-economic compensation of several social units. To date the Concessionaire has already paid the total socioeconomic compensation, however, is still pending one (1) social unit for being resettled and the monitoring restauration of livelihood conditions reach an end. For finishing the compliance of PS5, Arup is preparing the audit.	

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4	<p>Environmental Punitive Action:</p> <p>The Concessionaire has two (2) remaining punitive actions:</p> <ol style="list-style-type: none"> 1. In October 2018, ANLA issued the beginning of an environmental punitive action because of a hydraulic structure in UF4. 2. In May 2021, ANLA started other punitive actions for noncompliance regarding adjustments to the economic evaluation of impacts. <p>Arup requires periodically update of these processes to track them through next E&S report.</p> <p>UF: 4</p>	PS1	Next E&S monitoring Report	<p>There are currently three (3) opened sanctioning procedures. Arup finds the Concessionaire has been diligent submitting additional information and answering the requirements made by the authorities. This action remains on track until there are further announcement from the authorities. For the next monitoring report, Arup will continue monitoring any updates regarding these processes.</p>	
5	<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.</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, with 6 still pending.</p> <p>UF: All</p>	PS 6	Next E&S monitoring Report	<p>A total of twenty-five (25) fauna passages will be installed along the Project including underground and elevated types as a fauna management.</p> <p>The implementation of this management has been divided into two (2) phases: (i) construction of twelve (12) and (ii) construction of thirteen (13) fauna passages. The last phase also includes maintenance and monitoring effectiveness of the total (25) fauna passages.</p> <p>Currently thirteen (13) underground passages have been constructed and three (3) under bridge passages have been modified to serve as wildlife crossings. On the other hand, five (5) under bridge passages adaptations are under construction and four (4) aerial wildlife crossings are on pre-construction.</p> <p>Although the Concessionaire submitted information of the construction state of the fauna passages, Arup requests once again the Concessionaire to submit in the next report information regarding the effectiveness of the already constructed passages and report progress of the construction of the remaining wildlife crossings. To evaluate effectiveness of the fauna passages Arup needs the report of wildlife run overs, location, distance to closest fauna passage and type of fauna passage. This action is marked as "On Track."</p>	
6	<p>Protection against COVID-19:</p> <p>Arup request the Concessionaire to submit in the next monthly report information regarding the results of the implemented measures to determine how the outbreak has affected the Project and its environment, and which</p>	PS 2 PS 4	Next E&S monitoring Report	<p>Since the beginning of the Pandemic, the Concessionaire has reported 165 positive cases (from the EPC and the Concessionaire), all of them recovered and back to work. Additionally, the Concessionaire has vaccinated all its personnel.</p>	

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	<p>programs are being included in the project in compliance with IFC PS 1, 2 and 4.</p> <p>UF: All</p>			<p>During the previous period, 16 positive cases were reported jointly the Concessionaire and EPC. Arup is aware 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.</p> <p>As the Colombian government has declared the end of the sanitary emergency, Arup finds Covid-19 infections to not be an elevated risk for the Project. The action is marked as completed.</p>	
7	<p>Environmental files closure: Considering the end of works in UF2 and UF3. Arup requests that the Concessionaire 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>	PS 1	Next E&S monitoring report	<p>During this quarter, the Concessionaire has achieved the UF4 environmental closure under conditions on January 20, 2022. Therefore, all UF have reached environmental closure: UF 1, UF 2 and UF 3 in July 2019, October 2021, and August 2021, respectively. The Concessionaire has given an answer to the cure period for UF2. Furthermore, the Concessionaire has submitted the final report for closure of UF4 and is currently addressing commentaries made by the Supervisor. This action remains "On Track" until the final communication is received for UF4.</p>	
8	<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> <p>UF: All</p>	PS8	Next E&S monitoring report	<p>To date, the management of delivering the recovered archeological materials is still in process. The Concessionaire delivered a request to Támesis, Jericó, Itaguí and Antioquia University museums as well as the Antioquia University's archeological laboratory to be the final holders. Three of these institutions have replied to the request. However, the Concessionaire did not provide evidence on the communications with the final holders of the archeological materials, as requested in the last report. Neither was shared the final report, which was finished during the reporting period.</p> <p>This action remains "on track" until the above documentation is received, as well as the approval of the final report by ICANH:</p>	
9	<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 and the restauration of previous livelihood conditions.</p> <p>UF: All</p>	PS5	Next E&S monitoring report	<p>As the resettlement process is finishing, Arup is designing the final audit with the objective of review all mitigation measures with respect to the physical and/or economic displacement implemented by the Concessionaire, a comparison of implementation outcomes against agreed objectives, a conclusion as to whether the monitoring process can be ended and, where necessary, a Corrective Action Plan listing outstanding actions necessary to accomplish the objectives.</p>	

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10	<p>Mass balance for ZODMES: Arup requests the mass balance of ZODMES quarterly for review.</p> <p>UF: All</p>	PS3	Next E&S monitoring report	<p>Even though the Concessionaire submitted the mass balance, the data shows the Concessionaire is closing all permits regarding Zodmes, having none of them as a backup for contingencies in O&M stage. Thus, Arup requires the Concessionaire explicitly states what Zodmes are going to be used for contingencies during O&M.</p> <p>Also, there was no progress presented regarding the environmental permits of <i>El Rocio 2</i> and <i>Cartarma 2</i>.</p> <p>Considering the above, the action remains on track.</p>	
11	<p>Monitoring campaigns schedule: Due to construction activities are finished, the periodicity of monitoring campaigns will change. Therefore, Arup requests the monitoring schedule updated for O&M considering the new permits requested which require monitoring campaign and/or reporting.</p> <p>UF: All</p>	PS3	Next E&S monitoring report	<p>As of August 2022, the Concessionaire has not shared the schedule for the remining monitoring campaigns that should be developed during the O&M stage. It should include the monitoring campaigns for fixed facilities such as CCO, service area, tolls, among others. The action remains on track.</p>	
12	<p>Retrenchment Plan: In previous reports the Concessionaire informed about different actions addressed to reduce adverse labor impacts at the end of construction phase. For Arup is important to know the monitoring and new actions developed by the Concessionaire in terms to reduce and mitigate the cut-back impacts.</p> <p>UF: All</p>	PS2	Next E&S monitoring report	<p>Progress was shared during the March 2022 site visit. Documentary information and evidence of the Concessionaire's efforts to aid laid off personnel find new jobs in a rapid manner has been submitted. Arup finds the actions taken by the Concessionaire in this matter are adequate.</p>	
13	<p>Organizational capacity and competence: Arup requires the Concessionaire to submit the E&S organizational chart considering the new stage of the Project (O&M) will bring changes in the organization and responsibilities assigned in the E&S team.</p> <p>UF: All</p>	PS1	Next E&S monitoring report	<p>Regarding Social team, the Concessionaire has a group of ten (10) professionals made by: a social coordinator, a social analyst, and one professional in charge of each of the eight programs of the PGSC. Arup recognizes that despite social management impact will be reduced during the O&M, all social programs are managed. Whilst the environmental team is formed by four (4) professionals: an O&M manager, an Ambiental supervisor leader, a maintenance coordinator, and an operations coordinator.</p>	
14	<p>Grievances pending of response: The Concessionaire must give prompt solution to the five (5) grievances that still are open and are scheduled to be closed by the first semester of 2022. Until that, this PS will be pending.</p> <p>UF: All</p>	PS1	Next E&S monitoring report	<p>New action</p>	

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15	<p>Accidents: For this period, no information regarding accidents was submitted by the Concessionaire. Therefore, Arup requests an update that includes this data as well as additional events for the following monitoring period.</p> <p>UF: All</p>	PS2	Next E&S monitoring report	New action	
16	<p>GHG emissions: The Concessionaire has shared a document where Odinsa's targets are placed. Even though there is information about <i>Concesión La Pintada</i>, the information shared is not related to GHG emissions for the Concessionaire during 2020 and 2021. Furthermore, there are no explicit mitigation measures taken into account for GHG reduction as the PS N°3 required.</p> <p>UF: All</p>	PS 3	Next E&S monitoring report	New Action	
17	<p>Water consumption: Although the construction stage has finished, the Concessionaire should continue submitting the water consumption data since the Project is still requiring this source for O&M activities. The information shall come along with the strategies implemented to reduce consumption and KPIs to follow-up performance and improve it over time.</p>	PS 3	Next E&S monitoring report	New Action	
18	<p>Waste management: Arup requires the Concessionaire to submit information related to waste management which shall involve generation quantities, disposal quantities, certifications along the chain of custody and licenses from the third parties involved within the waste management process.</p>	PS 3	Next E&S monitoring report	New Action	