





8. Updated Action Plan







Table contains all the environmental and social actions the Concessionaire must undertake to close the gaps with the IFC Performance Standards and Equator Principles III. The Concessionaire has given a solution to some of the actions requested in the latest version of the Action Plan from 2022 E&S Construction Closure Report.






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 status of the actions is shown in and has been evaluated with the following color coding.




 Solved  On Track  Pending  New action





Table 7. Action Plan Monitoring – Pacifico 2.

No	Proposed Action	Proposed Deadline	Status (Updated Dec 2023)	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> <p>PS: 1</p>	O&M	<p>The Concessionaire sent information on this matter regarding construction.</p> <p>The action is marked as “Solved”.</p>	
2	<p>Offset Plan: The Concessionaire has several offset 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.</p> <p>UF: All</p> <p>PS: 6</p>	O&M	<p>As of December 2023, the Concessionaire had achieved the closure of nine (9) resolutions regarding environmental offsets due to forestry use. 14 are in execution.</p> <p>The offset of Cauca River Nature Reserve Subtraction is pending (1434ha), it is the largest offset of the Project. 350ha has already been obtained for the offset through conservation contract with Biosuroeste. No further progress.</p> <p>The IESC reiterates the importance of this offset completion to restore ecological balance in the influence area and to ensure no net biodiversity loss.</p> <p>This action remains On Track.</p>	
3	<p>Socioeconomic Compensations</p>	-	Solved in 2022 period.	
4	<p>Environmental Sanction Procedures:</p> <p>The Concessionaire has two (2) remaining punitive actions:</p> <ol style="list-style-type: none"> In October 2018, ANLA issued the beginning of an environmental punitive action because of a hydraulic structure in UF4. 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> <p>PS:1</p>	O&M	<p>To date, the procedures are currently ongoing, three (3) with ANLA and one (1) with Corantioquia. Arup finds the Concessionaire has been diligent in submitting additional information and answering the requirements made by the authorities.</p> <p>The latest sanction procedure was opened in 2023. Filing of the procedure has been solicited by the Concessionaire.</p> <p>For the next monitoring report, Arup will continue monitoring any updates regarding these processes.</p>	

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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 PS:6</p>	O&M	<p>From the 25 wildlife crossings planned, only four aerial crossings are pending.</p> <p>This action is marked as “On Track” and will continue in O&M phase until completion of wildlife crossing installation.</p>	
6	Protection against COVID-19	-	Closed in 2022 period.	
7	Environmental files closure	-	Closed in 2022 period.	
8	Archeological holders	-	Closed in 2022 period.	
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 PS: 5</p>	O&M	The resettlement process continues for social units located in UF5 (Quebra del Guamito sector) due to PR17 contingency. This is being monitored in Action 19 of the ESAP therefore this action is closed.	
10	<p>Mass balance for ZODMES: Arup requests the mass balance of ZODMES quarterly for review.</p> <p>UF: All PS: 3</p>	O&M	The concessionaire claimed that the Zodme for contingencies will be La Cortez. Regarding Zodme on UF5 which was affected due to the landslide, the concessionaire submitted evidence of the closure of the Zodme, indicating that the situation has been managed and solved in 2023.	

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			The action remains on track until the concessionaire shares the balance of mass of the active Zodme.	
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 PS: 3</p>	O&M	<p>The concessionaire submitted evidence of monitoring campaigns of water discharge and air quality. No information was submitted regarding noise due to the phase of the project.</p> <p>Therefore, the action is marked as “On Track”</p>	
12	Retrenchment Plan	-	Closed during 2022 period.	
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 PS: 1</p>	O&M	<p>In compliance with the IFC PS1, the Concessionaire needs to respond to grievances in a determined amount of time to be following the standards. Up to December 2022, there was one (1) grievance that was still opened. As of December 2023, no information regarding pending grievance was sent.</p> <p>Nevertheless, it is relevant to mention that closing the grievance is not necessarily a material risk; therefore, follow-up actions can be carried out during O&M stage. However, it is reminded that to comply with this action is to comply with IFC PS1.</p>	
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 PS: 2</p>	-	<p>The Concessionaire sent reports and investigation on accidents of the 2023 period.</p> <p>The action is marked as “Solved”</p>	
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</p>	O&M	<p>The concessionaire submitted the GHG inventory for 2023. It has complete information about the activities that generate emissions and quantified on an annual basis. There are some unclear items like the methodology used and unknow emission factors. The strategies</p>	

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	mitigation measures considered for GHG reduction as the PS N°3 required. UF: All PS:3		implemented are appropriate but it's important to measure with the inventory made the number of emissions that will be compensated. Other than that, Arup concludes it complies with the PS standard. This action is marked as "On Track"	
17	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. UF: All PS: 3	O&M	Arup considers that having an active PUEAA is a good sustainability practice, however, to fully comply with the PS Standards, it's necessary to define KPIs and long-term goals related with water saving. This action is marked as "On Track"	
18	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. UF: All PS: 3	Construction	The Concessionaire has submitted the information required previously including certifications and the entire chain of custody of wastes along with the licenses and permits from the third parties involved in the waste management. The action is marked as solved. Arup is expecting the Concessionaire to continue submitting this information through the O&M stage within the PS°3 compliance.	
19	Potential new land acquisition process: The Concessionaire kept communications with owners and inhabitants of 6 properties in UF 5- Quebra de Guamito sector, that could be impacted for land acquisition. For the next period Arup request detailed information about this process, including the properties needed to be acquired and the communications held with the affected people. UF: 5 PS: 5	O&M	The Concessionaire must acquire nine (9) properties from the sector. Owners of six (6) of these properties have accepted the offerings of purchase and they are in the process of registration of the deeds. There was a school and seven (7) social units in those properties that should be relocated. The impacted school was on a property owned by Santa Barbara municipality and was relocated temporarily. Agreements regarding the value of the socioeconomic compensations have been reached with five (5) of them and the related evidence was shared with Arup. The Concessionaire informed that it has paid compensation to four (4) social units. For the next quarter the Concessionaire should give information and evidence on i) the current location and life conditions of these people, ii) the support given to them by the Concessionaire regarding their resettlement, besides the compensations, iii) the monitoring process to the social units. Also, the Concessionaire should continue informing Arup on the progress of land acquisition and socioeconomic compensations.	

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			This action is marked as “On track”.	
20	<p>Labor and Working Conditions documents: For the IESC to review compliance with PS2 the Concessionaire has to keep submitting information about trainings, inductions, minutes of COPASST and Social Committee, internal petitions, complaints, claims and suggestions.</p> <p>PS: 2</p>	O&M	<p>The Concessionaire sent the required documents.</p> <p>The action is marked as “Solved”</p>	
21	<p>Environmental and social management system (ESMS): During the site visit, Arup was informed that the Concessionaire is working on the certification of ISO 14001, the process is still ongoing. Arup highlight this initiative; however, Arup wants to remember that the ESMS required by Performance Standard 1 requires a more robust and extensive stakeholder engagement process than the required by ISO 14001.</p> <p>PS: 1</p>	O&M	<p>Arup received evidence of internal audits processes regarding improvements of internal processes and regarding ESMS. The concessionaire submitted the final documentation regarding internal process of audit showing a positive concept.</p> <p>Therefore, this action is marked as “Solved”</p>	
22	<p>ESMS’s policy: Arup requests the policy that is going to be used during 2023 and O&M phase with the statement of commitment with values, principles, objectives, and goals.</p> <p>PS: 1</p>	O&M	<p>Arup received the policy that was used during 2023. It was evident that the document presented commitment, values, principles, objectives, and goals.</p> <p>This action is marked as “Solved”</p>	
23	<p>Requests made by La pintada community: During August 2022, a nearby community of La Pintada blocked the road alleygating impacts to their livelihoods and requesting the construction of a roundabout to entry into La Pintada Municipality and return a previous existing access to the Catarma River due to leisure activities. The Concessionaire should: i) submit updates on this issue for the next report, and ii) identify and characterize the street vendors and farmers from La Pintada that could be impacted by the Project.</p> <p>PS: 1</p>	O&M	<p>No update was made on the situation with the La Pintada Community. Arup expects to have follow-up in the next reports.</p> <p>This action is marked as “On Track”</p>	

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24	<p>E&S and STT training: During this period, the Concessionaire did not send information regarding the trainings for E&S and SST matters. The documentation showing that the trainings were conducted should be sent.</p> <p>PS: 1</p>	O&M	<p>The Concessionaire sent the required documents.</p> <p>The action is marked as “Solved”</p>	●